Glasgow Centre for Population Health / NHS Greater Glasgow and Clyde joint response to the Scottish Parliament's consultation on a proposal for a Restricted Roads (20mph limit) (Scotland) Bill

SECTION 1 - ABOUT YOU

- 1. Are you responding as: on behalf of an organisation $\sqrt{}$
- **2B.** Please select the category which best describes your organisation: Public sector body (Scottish/UK Government/Government agency, local authority, NDPB) $\sqrt{}$
- 3. Please choose one of the following; if you choose the first option, please provide your name or the name of your organisation as you wish it to be published.

I am content for this response to be attributed to me or my organisation $\sqrt{}$

Please insert your name or the name of your organisation.

This is a joint response from the Glasgow Centre for Population Health (GCPH) and NHS Greater Glasgow and Clyde (GGC)

4. Please provide details of a way in which we can contact you if there are queries regarding your response.

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SECTION 2 - YOUR VIEWS ON THE PROPOSAL

Aim and approach

1. Which of the following best expresses your view of the proposal to replace the current 30mph default speed limit on restricted roads with a 20mph limit.
√ Fully supportive
☐ Partially supportive
☐ Neutral (neither supportnor oppose)
☐ Partially opposed
☐ Fully opposed
Unsure

Please explain the reasons for your response.

GCPH/NHSGGC fully supports the introduction of a mandatory 20mph limit in urban settings (on restricted roads) across Scotland as a significant preventive public health measure. There is longstanding, robust evidence cited in the consultation paper and from many other sources that this measure will improve safety by reducing the number and risk of accidents as well as severity of injury if an accident does occur.

There is also strong evidence that lowering traffic speed can encourage people to walk and cycle in urban settings. This measure would also contribute to allaying parental fears regarding their children walking to school¹. The health and economic benefits of increasing population levels of active travel are well documented. A review describing the potential effect of increased walking and cycling in urban England and Wales on the National Health Service (NHS) estimated a saving of approximately £17 billion through the reduced prevalence of diseases associated with physical inactivity².

Other important public health benefits of mandatory speed reduction include reduced noise pollution and improved air quality. A working party report produced by the Royal College of Physicians and the Royal College of Paediatrics and Child Health in 2016 provides a stark warning regarding the dangerous impact of air pollution on population health, stating³:

"Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution which plays a role in many of the major health challenges of our day. It has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia. The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness and premature death, to our health services and to business. In the UK, these costs add up to more than £20 billion every year."

In addition to direct impacts, there are other social benefits likely to accrue from reduced traffic speed, including improving the liveability and environmental quality in urban areas to the benefit of residents, workers, visitors and retailers.

We applaud the commonsense approach and the flexibility of the proposal by which local authorities will have the option to designate some roads in built-up areas as being suitable for a 30mph limit where appropriate arguments for such re-designation can be made.

2. Could the aims of this proposal be better delivered in another way (without a Bill in the Scottish Parliament)? No

Please explain the reasons for your response.

The current proposal is the most appropriate, cost and time efficient way of reducing traffic speeds in urban settings comprehensively across Scotland. The Faculty of Public Health's Manifesto for Public Health calls for the introduction of good laws to prevent bad health and save lives⁴. The manifesto includes setting 20mph speed limits in built up urban areas as one of the 12 priority areas where specific and urgent action is needed. We need strong political leadership in Scotland through legislation supported by communication/social marketing campaigns to normalise slower traffic speed in urban settings, change our car-dominated culture and encourage more of our population to walk, cycle and use public transport. Many European countries with similar characteristics to Scotland have achieved high levels of walking and cycling in their cities through strong political leadership accompanied by appropriate investment⁵.

3. What do you think would be the main advantages, if any, of the proposal?

Reducing road speed in urban areas will reduce the number of road traffic accidents (RTAs) as well as the severity of injuries incurred in RTAs. The most likely cause of death in UK children aged 11-16 not attributed to disease is road accidents⁶. The introduction of 20mph limits and zones reduce the number and severity of road traffic accidents⁷, and several studies have shown that the risk of pedestrian death increases sharply between the speeds of 20mph and 30mph⁸. Safety benefits may arise both through reducing the likelihood of collision and by reducing the severity of injury should an accident happen. In London, 20mph zones have led to a 42% reduction in casualties compared with areas outside the 20mph zone⁹.

However, other benefits are likely to accrue from the Bill. Reducing road speed, particularly if combined with the introduction of safer, high quality infrastructure for walking and cycling, will help encourage more people to walk and cycle.

The proposal could, if introduced alongside other initiatives to encourage greater walking, cycling and public transport use, help achieve a modal shift away from our current car dependency. In turn, reduced car use will help lower carbon emissions and improve air quality, while greater levels of walking and cycling will provide multiple benefits with increased physical activity leading to better physical and mental health and help to address the rising levels of people who are overweight or obese.

- **4. What do you think would be the main disadvantages, if any, of the proposal?** There are very few disadvantages to the Bill as proposed. One concern might be if the opportunity to re-designate some roads as 30mph was too easy to implement, in which case the purpose and benefits of reducing urban road speeds in a local urban environments might be lost if the *de facto* speed limit on many roads did not reduce.
- 5. What measures do you think would be needed to maximise compliance with the new national 20mph speed limit on restricted roads? (Examples might include advertising, signage or police enforcement.)

We expect that the implementation of this new national speed limit would need to be backed by a high profile media campaign that explains the purpose and likely benefits of the new limit. Police commitment to support enforcement of the new limit would have to be secured. The application of lessons learned from the introduction of previous legislation, such as seat belt and tobacco laws, will be important, and be accompanied by campaigns in both traditional media and social media.

6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on: (a) the Scottish Government ☐ Significant increase in cost ☐ Some increase in cost ☐ Broadly costneutral ☐ Some reduction in cost √ Significant reduction in cost □ Unsure The financial impacts of road traffic accidents are set out on page 23 of the consultation as well as indicative savings that will accrue following the introduction of 20mph speed limits. We consider that there is very strong evidence that the introduction of this Bill will reduce the prevalence and severity of road traffic accidents in urban settings in Scotland, which in turn will reduce incurred costs associated with the use of emergency services, hospital care, sickness absence and road network disruption. There may be longer term population health benefits due to reductions in noise pollution, improved air quality and higher levels of walking and cycling, which could, if realised, over the longer term, reduce ill health and premature mortality, and their associated costs. (b) Local authorities ☐ Significant increase in cost ☐ Some increase in cost ☐ Broadly costneutral ☐ Some reduction in cost √ Significant reduction in cost □ Unsure As well as the range of potential health and health economic benefits outlined above, there are likely to be savings for local authorities in the costs associated with introducing 20mph schemes. As outlined in this consultation, there are costs associated with introducing each individual 20mph scheme, including Traffic Regulations Orders (TROs) and signage, which would be minimised by a one-off introduction of a 20mph limit on restricted roads. (c) Motorists ☐ Significant increase in cost ☐ Some increase in cost ☐ Broadly costneutral

Overall we do not foresee any significant cost implications for individual motorists in relation to the implementation of a 20mph limit in urban areas. However, for motorists as a whole, if there is a reduction in road traffic accidents, then the overall costs of such accidents would drop and potentially, if significant, this could impact positively on insurance premiums.

√ Some reduction in cost

□ Unsure

☐ Significant reduction in cost

d) Other road users and members of the public
Significant increase in cost
Some increase in cost
Broadly costneutral
Some reduction in cost
Significant reduction in cost
] Unsure
Overall we do not foresee that there is likely to be any significant cost implication for other bad users and members of the public in relation to the implementation of a 20mph limit in rban areas. That said, the evidence suggests that accidents, and their severity should the ccur, will be reduced and therefore, the overall costs associated with road traffic accident will be reduced at a population level.
e) Other public services (e.g. NHS, Fire and Rescue Services etc)
Significant increase in cost
Some increase in cost
Broadly costneutral
Some reduction in cost
Significant reduction in cost
] Unsure

Please explain the reasons for your response.

There are likely to be measureable cost reductions for public services related to the implementation of a 20mph limit in urban areas. The evidence suggests that accidents, and their severity should they occur, will be less likely and therefore, costs associated with attending road traffic accidents, dealing with their aftermath and NHS costs will reduce.

Over a longer period, a lower speed environment has the potential to reduce air and noise pollution and by creating a more attractive and safe environment, will encourage more people to walk and cycle for short journeys. If modal shifts towards more active travel modes are achieved then there would be long-term population health benefits, increased healthy life expectancy and associated reductions in the costs to health and social care services.

7. Do you believe there will be any other benefits to reducing the speed limit from 30mph to 20mph?

Previous GCPH research on road traffic accident data for Scotland has highlighted a recent rise in adult cyclist casualties, a consistently higher rate of pedestrian casualties in more deprived communities, a higher rate of child cyclist and pedestrian casualties in comparison with adults and higher levels of cyclist and pedestrian casualties in large urban areas ¹⁰. By reducing speed limits in tandem with other targeted initiatives, such as the introduction of segregated cycle lanes and traffic calming in specific areas associated with higher prevalence of road traffic accidents (RTAs), it may be possible to not only reduce the number and severity of RTA casualties but to reduce the social gradient in traffic casualties while boosting levels of walking and cycling, and so reduce health inequalities.

There are other social benefits likely to accrue from reduced traffic speeds in urban settings, such as an improvement in the liveability and environmental quality in urban areas benefiting

residents, workers, visitors and retailers. A landmark study conducted by Donald Appleyard in 1969¹¹ replicated in Bristol in 2008 by Joshua Hart¹² found that excessive speed, volume and flow of vehicular traffic on residential streets undermines 'liveability' of these streets for residents in terms of reduced social networks and utilisation of their streets as a social space.

. What overall impact is the proposed Bill likely to have on equality, taking ccount of the following protected characteristics (under the Equality Act 010): age, disability, gender re-assignment, marriage and civil partnership, regnancy and maternity, race, religion and belief, sex, sexual orientation? Positive
Fositive
Slightly positive
Neutral (neither positive nor negative)
Slightly negative
] Negative
] Unsure

Reducing urban road speeds should make it easier for people from different ethnic and cultural backgrounds and with different personal characteristics to access local urban environments safely. As noted above, child pedestrians are more likely to be a road traffic accident casualty than adults. Reducing speed limits should reduce casualties overall and, if combined with other targeted approaches (see above), the imbalance in casualties between adults and children could be reduced. In addition, slower speeds will reduce risks for older people as pedestrians as well as those with any mobility impairment.

- **9.** Could any negative impact of the Bill on equality be minimised or avoided? We do not consider there will be any negative impact of the Bill on equality.
- 10. Do you consider that the proposed bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

√ Yes

Please explain the reasons for your response.

The likely impact of this bill would be to make it easier and safer for people, particularly pedestrians and cyclists, to travel sustainably in their local areas. This in itself is a positive environmental aim that would help to contribute to a more sustainable economy.

Indeed the proposed bill would help support better outcomes across a range of interlinked government policy. For example, across a range of government policy there is recognition of the positive contribution active travel – which would likely be boosted by the proposed legislation – can make to addressing obesity¹³, climate change¹⁴ and air quality¹⁵, its social¹⁶ and economic benefits¹⁷ and, conversely, of the adverse effects on quality of life associated with high volumes of motor vehicle traffic¹⁸.

11. Do you have any other comments or suggestions on the proposal to establish a 20mph default speed limit on restricted roads?

It is worth noting that there has been support for the general aims of this bill expressed in a range of forums and through previously published reports. In 2009, the Glasgow Health Commission recommended the introduction of mandatory 20mph zones in residential areas to facilitate healthier ways of living 19. This was one of 20 recommendations for improving the health of the city. In November 2015, the GCPH supported a proposal for a 20mph limit in Glasgow's city centre, but recommended that such a limit should be extended across the city²⁰. As has previously been stated, mandatory reduction of speed limits to 20mph in residential areas is one of the key priority areas identified by the UK Faculty of Public Health⁴. We conclude our response to this consultation with a simple statement by the University of Oxford's Professor Danny Dorling "Lower speeds save lives and revive communities." 21

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