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Head of Roads Policy  
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22<sup>nd</sup> October 2018

Dear Mr Matheson,

**Default 20mph limits in Scotland**

I am writing to you with regards to the Proposed Restricted Roads (20mph Limit) (Scotland) Bill which has been introduced by Mark Ruskell MSP and proposes to reduce the default limit on restricted roads from 30mph to 20 mph.

Firstly, may I state that the RAC, as a responsible motoring group is a supporter of 20mph limits where they are appropriate in towns and cities across Scotland and we share policy maker's ambition to make our streets as safe as possible to work towards zero fatalities on our roads. However, we believe that there is not enough conclusive evidence to suggest default 20mph limits in built up areas will contribute materially to achieving this for the following reasons:

- An Interim study published in 2017 by Atkins, AECOM and Professor Mike Mahar<sup>1</sup> suggested that while 20mph zones (eg with traffic calming measures) can reduce collisions, 20mph limits without calming measures was found to be far less effective.
- In Manchester, a roll-out of 20mph limits was paused after the evidence found that it made little difference to either speed or accidents, and Manchester council is now looking at whether other methods could be more effective<sup>2</sup>. This possibly reinforces the argument about appropriate limits for certain roads and where road layout and types of calming measures are not sufficient enough, compliance falls.
- RAC Report on Motoring research in 2012 found that only 36% admitted to breaking the speed limit, this rose to 46% by 2016, though compliance most recently has showed some improvement. Generally, seven years ago, drivers were more supportive of the need for 20mph in certain areas in towns and cities (near schools, hospitals or areas with high pedestrian footfall and cyclists) and compliance reflected this. However, as 20 mph limits have been rolled out more widely across England, motorists have questioned the appropriateness of the limit, particularly on busy through-routes. More than a third of drivers (31%) who admit to breaking the 20mph limit in 2016 said that they believed the limit was inappropriate for the road layout.

We believe that the most appropriate action by authorities would be to review areas where there is a high interaction between motorists and other road users, and higher collision rates and focus efforts on reducing speeds and compliance with those limits in hotspots, rather than blanket urban 20mph limits. This should include the introduction of calming measures where appropriate.

We also believe that variable speed limits on some urban roads at particular times of the day and days of the week (with flashing amber lights and variable electronic speed limit signage) may be appropriate and would highlight to drivers the reasons why a limit is set to 20mph at that particular time (e.g. when children



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are arriving at or leaving a school at the beginning and end of a school day).

We note that the Bill has significant cross-party support, but we would urge you to consider all of the evidence (or lack of it) when assessing the proposals on the table before the Scottish Government decides whether or not to support the Bill.

If the Scottish Government is able to find evidence that conclusively shows that reducing the default limit across Scotland's urban areas to 20mph will greatly improve road safety and reduce casualties, then the RAC will be supportive of the proposal. However we remain unconvinced by the evidence to which we have had access.

Yours sincerely



HEAD OF ROADS POLICY

<sup>1</sup> <http://www.pacts.org.uk/wp-content/uploads/sites/2/20mph-Research-GPS-Analysis-RSGB-Analysts-Conf-Febv1.pdf>

<sup>ii</sup> <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/20mph-speed-limit-manchester-stopped-12706663>

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*Dew*



Thank you for your email of 22 October regarding the Proposed Restricted Roads (20 mph Limit) (Scotland) Bill, which has been introduced by Mark Ruskell MSP.

The Scottish Government is committed to reducing risk on Scotland's roads and recognises that vehicle speed is a crucial factor in this endeavour. We are committed to protecting vulnerable road users such as children, pedestrians and pedal cyclists, and have already published guidance for local authorities to help reduce speeds in residential areas. The Good Practice Guide on 20 mph speed restrictions, in 2015 and updated in 2016, was produced in partnership with the Society of Chief Officers of Transportation in Scotland:

[www.transportscotland.gov.uk/news/new-guidance-20-mph-limits-released](http://www.transportscotland.gov.uk/news/new-guidance-20-mph-limits-released)

The Guide aims to ensure greater consistency on setting 20 mph speed restrictions throughout Scotland, and encourages Local Authorities to introduce them near schools, in residential zones and in other areas of towns and cities where there is a significant volume of pedestrian and/or cyclist activity. We want to see 20 mph limits and zones implemented in Scotland where they are appropriate and are keen to encourage initiatives that cut speed, particularly near schools and in residential areas.

On 19 September, I met with Mark Ruskell MSP regarding his plans to introduce a Member's Bill on 20 mph speed limits. I indicated that whilst I was broadly supportive of the principles of the proposals there is a lot of detail, including wider impact which was yet to be considered.

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

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I also provided reassurance that I will keep an open mind going forward and that I welcome discussion of the merits or otherwise of these proposals throughout the parliamentary process. We recognise the importance of giving full consideration to these proposals to ensure we achieve our shared objectives of safe roads.

There are a range of views on the effectiveness of 20 mph limits – on safety, emissions and promoting active travel – and authoritative evidence in this area is still emerging. We note that a 3 year study by the Department for Transport (DfT) into the effectiveness of sign-only 20mph limits which is due to report in 2018.

We are clear that 20 mph speed limits are a good idea when implemented in the right environment.

I hope that this has been of assistance.



**Michael Matheson**

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