



05 March 2025

By email: [roadsafety@transport.gov.scot](mailto:roadsafety@transport.gov.scot)

Dear Sirs,

### **National Speed Limit Consultation**

I am responding on behalf of Aberdeen Cycle Forum. ACF is an established cycle campaign and advocacy group formed in 2003. Although we cannot claim to represent all Aberdeen cyclists, we have approximately 600 members. The majority of our focus is on Aberdeen city however we also take an interest in Aberdeenshire, and wider issues where relevant, such as here. Our aims, as set out in our constitution, are noted at the foot of this page.<sup>1</sup>

We have elected not to respond in the requested format as we do not consider that the questions posed adequately cover the issues as they relate to cyclists (and other vulnerable road users such as pedestrians and equestrians). Cyclists and pedestrians are currently over-represented in road casualty statistics but the information presented in the consultation makes little if any recognition of this.

The points we wish to make are:

1. We broadly agree that a reduction in the national speed limit would be a good thing for the most vulnerable road users (cyclists and pedestrians) and should result in a reduction in death and serious injuries on our roads.

---

<sup>1</sup> A) To encourage cycling and to promote the benefits of cycling to the individual and the wider community B) To advocate for a safer cycling environment and improved cycle facilities in Aberdeen. C) To campaign for cycling to be an integral part of planning and transport strategies and practice, in order to provide the widest possible access to cycling as a healthy and efficient means of travel for work and leisure.

2. We do not agree that a blanket approach to all single-carriageway roads is appropriate. Clearly the standard of single-carriageway roads varies greatly. We strongly feel that a more targeted approach is required and we would like to see much wider use of lower speed limits on minor rural roads. Limits of 40mph or 30mph would be safer and take better account of the safety of vulnerable users. There is much scope for expansion of 'walking & cycling roads' such as we have seen in Perth & Kinross, for example. Where roads remain with a higher (whether 60 or 50mph) limit there is a strong case for segregated cycle-ways, although these are sadly lacking at present on most roads.
3. Although we are not familiar with all the detail, we understand that it is currently quite onerous for a local authority to impose reduced limits on sections of road which have potential to be particularly dangerous. This process needs to be made simpler and this made more widespread. The B9077 Aberdeen – Banchory is a good example of a busy rural road with a poor accident record which is crying out for a reduced speed limit. Many cyclists simply avoid this road and others like it because of the real and perceived dangers presented by high volumes of fast-moving traffic.
4. Whatever the speed limit, we believe that lack of enforcement is currently a problem and speeding is widespread, blatant, and a major contributing factor to deaths and serious injury on the roads. Speeding is still viewed by many as socially-acceptable and not of itself, wrong. Many otherwise law-abiding citizens appear quite happy to ignore speed limits. We don't believe that the government's laudable targets to reduce death and serious injury can be achieved without a major change in driver culture.
5. Active enforcement by Police seems to have declined over the years, no doubt due to stretched resources – this needs to be reversed. We would also like to see more widespread use of camera enforcement, both mobile and fixed, as well as average speed cameras (which you will be aware have been effective at improving safety on the A9). We also understand (although again we do not have a full grasp of the detail) that there are considerable obstacles to be overcome by local authorities wishing to deploy speed cameras – again this needs to be made much easier.
6. As well as detection by enforcement, we think speeding probably also needs to be more severely punished by the Courts.
7. Without adequate enforcement – which we consider to be absent at present – there is less case to be made for a reduction in the national speed limit from 60 to 50mph – because we believe compliance would be low. It may be that a reduced speed limit which is not effectively enforced actually just encourages road traffic laws to be ignored more widely, and becomes counter-productive.
8. On major roads where 60mph is the current default and is appropriate, reducing the speed limit to 50mph may cause driver frustration which then exhibits itself in other ways which may be problematic or dangerous.
9. For reasons set out above we consider that the options presented in this consultation are far too simplistic. A 'whole-systems' approach is needed and speed limits by themselves are not the

only solution. As well as looking at enforcement and sentencing, we would also advocate that the road safety impacts of the following issues be considered more carefully:

- a. Driver education and training: in short, driver skills have not kept up with the speed and power of modern vehicles. There could be a case for a graduated licencing system whereby young and newly-qualified drivers are restricted in the types of vehicle they can drive. This has been the case with motorcycles for many years – why not for cars too? Currently, a car with 400BHP and a top speed of 155mph can be driven by someone who has newly passed their driving test.
- b. Driver competence: repeat testing at regular intervals could reduce much of the driver incompetence that is commonly seen on our roads. This should also cover drivers who may be aged or have medical conditions which should prevent them driving, but currently do not.
- c. Vehicle design: vehicles (cars and SUVs) have become larger, heavier and more powerful over the last ~20 years in particular. This has clearly led to an increase in both speed and collision impacts. We have no doubt that this has led to an increase in death and serious injuries, despite cars also being safer (at least, for the occupants) than historically. High-torque electric motors and automatic transmissions are also a cause of vehicles accelerating far more quickly than was historically the case which we feel will lead to errors of judgement and inevitably, more collisions. In short – many drivers do not have the skills or competence required for the high-power and high-speed vehicles which are now commonplace. As well as driving standards needing to improve (see our comments at a and b above) a case could also be argued for restrictions on the power output, maximum speed, size and weight of vehicles.
- d. Presumed liability: the UK is one of very few countries which does not have a system of presumed liability to protect more vulnerable road users. We believe this would be a key part of a cultural change, as per our comment at 4 above.

We hope you find these comments useful.

Yours faithfully,

Gavin Clark

Convenor, Aberdeen Cycle Forum