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# **NATIONAL SPEED MANAGEMENT REVIEW**

Consultation response

**March 2025**

# NATIONAL SPEED MANAGEMENT REVIEW CONSULTATION

Transform Scotland response

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Speed is one of the main risk factor in traffic safety, as it increases both the chances and the severity of a crash. To achieve improved traffic safety by influencing the speed of travel, road authorities may decide to lower the legally imposed speed limits. Reductions in posted speed limits from higher speed limits including 50 and 60mph roads to lower posted speed limits invariably reduce collisions and decrease more substantially the degree of severity of injuries compared with control areas.<sup>1 2 3 4</sup>

Given that the international evidence base is unequivocal, Transform Scotland welcomes the proposed change to decrease car/motorcycle speed limits from 60mph to 50mph on single carriageways. This directly addresses the high levels of collisions and injury and injury severity including deaths which are too common on higher speed single carriageway roads. This aligns with the Safe Systems approach<sup>5 6</sup> to which Transport Scotland Road Safety Framework to 2030 seeks to adhere to.

By contrast, given that the international evidence base for the proposed changes to increase the speed limits for Heavy Goods Vehicles (>7.5t) from 40mph to 50mph on single carriageways and from 50 mph to 60 mph on dual carriageways, is both limited and equivocal, Transform Scotland opposes the proposed change.<sup>7</sup> This proposal does not align with the Safe Systems approach. Despite legitimate concerns regarding speed differentials between vehicle classes, the evidence cited in favour of the increase is, at best weak, and with significant risks of bias.

Our main points are summarised as:

- **Transform Scotland is in support of the proposed change to decrease car/motorcycle speed limits from 60mph to 50mph on single carriageways.**
- **Transform Scotland does not support the proposed changes to increase the speed limits for Heavy Goods Vehicles (>7.5t) from 40mph to 50mph on single carriageways and from 50 mph to 60 mph on dual carriageways.**
- **A Safe Systems approach to road safety is at odds with increasing the speed limit for any class of road user.**
- **The international evidence base demonstrates that there are more collisions, injuries and fatalities when speed limits increase and fewer collisions, injuries and fatalities when speed limits decrease.**
- **The data used to support claims for evidence in the proposal to increase the speed limit for HGVs is weak with significant risks of bias.** Both the A9 pilot and the English study contained a variety of biases including lack of appropriate control areas, small sample sizes effects given fluctuations among small numbers (the law of small numbers), and errors in measurements. Specifically for the A9 pilot, a confounding issue with the average speed cameras makes it impossible to know what the effect was of the increase the speed limit increase for HGVs alone.

In addition, we note that:

- Increased HGV speeds would increase air and noise pollution.

- There is a risk that rail freight could be re-assigned to road, undermining further the importance of rail freight's role in distribution, and the environmental benefits of rail freight.
- Road traffic policing is part of the means through which speed limit compliance can be achieved. However, the November 2024 HMIC report on Traffic Policing<sup>8</sup> found that there has been a reduction in roads policing not least due to a significant reduction in police officer numbers. Yet, greater emphasis is needed on the important role of traffic policing in reducing speed limit violations. Positively, the random allocation of stationary policing methods to different locations on the road network has been found to be effective, producing substantial impacts on crash rates and reductions in mean speeds and large distance halo effects.<sup>9</sup>
- There is a risk of a spill-over effect whereby a higher HGV speeds may also result in higher HGV speeds on adjacent arterial roads with lower limits.<sup>10</sup> The spillover effect is the tendency of drivers to maintain relatively higher speeds after leaving an area with a high-speed limit. Recent US research supports earlier findings.<sup>11</sup> Any spill-over effect will be exacerbated by limited road traffic policing.



<sup>1</sup> De Paaw, E., Daniels, S., Thierrie, M. et al, 2014 Safety effects of reducing the speed limit from 90 km/h to 70 km/h, Accident Analysis and Prevention, 62 426-431.

<sup>2</sup> Doecke, S., Kloeden, C., Dutschke, J. Baldock, M. 2018 Safe speed limits for a safe system: The relationship between speed limit and fatal crash rate for different crash types, Traffic Injury Prevention, 19:4, 404-408, DOI: 10.1080/15389588.2017.1422601

<sup>3</sup> Lubbe, N., Jeppsson, H., Sturmland, S., Morando, A. 2024 Injury risk curves to guide safe speed limits on Swedish roads using German crash data supplemented with estimated non-injury crashes, Accident Analysis and Prevention, 202: 107586.

<sup>4</sup> Elvik, R., Vadeby, A., Hels, T., et al, 2019 Updated estimates of the relationship between speed and road safety at the aggregate and individual levels, Accident Analysis and Prevention, 23.

<sup>5</sup> International Transport Forum, 2008 Towards Zero: Ambitious Road Safety Targets and the Safe System Approach. Paris: OECD.

<sup>6</sup> International Transport Forum, 2016 Zero Road Deaths and Serious Injuries: Leading a Paradigm Shift to a Safe System. Paris: OECD.

<sup>7</sup> Korkut, M., Ishak, S., Wolshon, B. 2010 Freeway Truck Lane Restriction and Differential Speed Limits, Transportation Research Record, 2194: pp. 11–20. DOI: 10.3141/2194-02

<sup>8</sup> HMIP, 2024 Thematic Inspection of road policing in Scotland Thematic inspection of road policing in Scotland | HM Inspectorate of Constabulary in Scotland.

<sup>9</sup> Elliot, M., Broughton, J. 2004. How methods and levels of policing affect road casualty rates. TRL Report TRL637. Crowthorne: TRL. Unpublished project report template: (tfl.gov.uk)

<sup>10</sup> Alhomaidat, F., Kwigizile, V., Oh, J., van Houten, R. 2020 How does an increased freeway speed limit influence the frequency of crashes on adjacent roads? Accident Analysis and Prevention, 136: 105433.

<sup>11</sup> Romo, A., McDonough, J., Wei, A., Yang, C. 2024 Uncovering the Spillover Effect from Posted Speed Limit Changes: A Tool to Examine Potential Safety Concerns (Technical Report). Washington, D.C.: AAA Foundation for Traffic Safety.

**Scotland's alliance for sustainable transport**

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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).