

Agenda Item	9.
Report No	CC/12/22

HIGHLAND COUNCIL

Committee: Caithness Committee

Date: 22 August 2022

Report Title: Thurso 20mph Speed Limit

Report By: Executive Chief Officer Infrastructure, Environment & Economy

1 Purpose/Executive Summary

- 1.1 This report asks Members to discharge the authority's duty to consider the single objection to the proposed permanent 20mph speed limit order in Thurso, which was properly submitted and not withdrawn, before deciding whether to approve the making of the Road Traffic Regulation Order 'The Highland Council (Thurso) (20mph Speed Limit) Order 2022'.

This report also invites Members to consider the 3 representations of support received for the proposals and the 2 resolved objections.

2 Recommendations

- 2.1 Members are asked to:-

- i) note the background to the proposed 20mph speed limit order for Thurso;
- ii) consider the 1 objection made in accordance with the regulations and not withdrawn;
- iii) consider the 2 representations of support received during statutory consultation;
- iv) note there were 2 resolved objections and one letter of support received during the consultation for the associated traffic calming on Janet Street;
- v) subject to ii) above, approve the making of the Road Traffic Regulation Order; and
- vi) note the intention the intention to carry out after speed counts to determine effectiveness of the new reduce speed limit

3. Implications

- 3.1 **Resource** – These proposals are being funded via the Transport Scotland ‘Cycling, Walking and Safer Routes’ external grant funding.
- 3.2 **Legal** – Formal speed limits require to be supported by a Road Traffic Regulation Order. This report sets out the representations received and is seeking approval to make the RTRO.
- 3.3 **Community (Equality, Poverty, Rural and Island)** – Lower vehicle speeds aim to reduce the risks for vulnerable road users and increase active travel choices.
- 3.4 **Climate Change / Carbon Clever** – Reduced vehicle speeds have the aim of increasing active travel choices and thus reducing the number of vehicles on the roads.
- 3.5 **Risk** – If the making of the Road Traffic Regulation Order is not approved the speed on the streets identified with the proposed RTRO in Thurso will revert back to 30mph.
- 3.6 **Gaelic** – There are no Gaelic implications.

4. Background

- 4.1 As part of the Highland Council response to COVID 19 a funding application was made to Sustrans Spaces for People to install the 20mph speed limit utilising a Temporary Traffic Regulation Order (TTRO). This application was successful, and the scheme was installed in March 2021. The TTRO has a duration of 18 months and expires in September 2022.
- 4.2 This scheme is part of the Council’s overall strategy to introduce 20mph speed limits in our town and residential areas as a measure to improve road safety, provide an environment to encourage healthier and more sustainable transport choices such as walking and cycling, benefit casualty reduction and severity, and improve the safety of school children who are susceptible to visual looming.
- 4.3 When designing 20mph schemes The Highland Council follows Government guidance set out in ‘Setting Local Speed Limits: Guidance for Local Authorities: Enterprise, Transport and Lifelong Learning Department (ETLLD) Circular No 1/2006’, ‘The ‘Traffic Signs Regulations and General Directions’ (TSRGD) and Transport Scotland’s ‘Good Practice Guide on 20mph Speed Restrictions, Review June 2016, Version 2’. This guidance states that when installing a 20mph limit, the existing mean average vehicle speeds should be below 24mph to allow the 20mph limit to be installed without traffic calming.
- 4.4 During the design process speed surveys were carried out in several locations in Thurso (see **Appendix 1**) and as a result of the mean average speeds being recorded above 24mph speed cushions were designed for Janet Street and a lined traffic calming scheme designed for Castlegreen Road.

Two objections which have now been resolved and 1 representation in support of the Janet Street speed cushion proposals were received during consultation. There are no outstanding objections to the traffic calming proposals.

4.5 There is one outstanding objection to the wider 20mph limit scheme for Thurso.

5. Consultation

5.1 A draft RTRO entitled “The Highland Council (Thurso) (20 mph Speed Limit) Order 2022” was prepared. Details of the draft RTRO are contained in:-

Appendix 2 Plan showing the area of the proposed 20mph speed limit.

Appendix 3 Schedule of roads.

5.2 Prior to statutory consultation taking place the elected Members were consulted. Statutory consultation then took place with the Emergency Services, Community Council, Freight Transport Association, Road Haulage Association, Highland Cycle Campaign and Bus Companies took place and the proposals were then advertised in the local press for the period 4th March – 2nd April 2022.

6. Representations

6.1 The Highland Council has received 2 emails of support and has one outstanding unresolved objection to the making of the permanent 20mph RTRO in Thurso.

6.2 A summary of the representations and officer comments is set out in the table in **Appendix 4**. Copies of the representations and communications are provided at **Appendix 5**.

6.3 In view of the desire to make progress with making permanent the 20mph limit in Thurso this report is being brought to Committee to seek approval for the making of the Road Traffic Regulation Order.

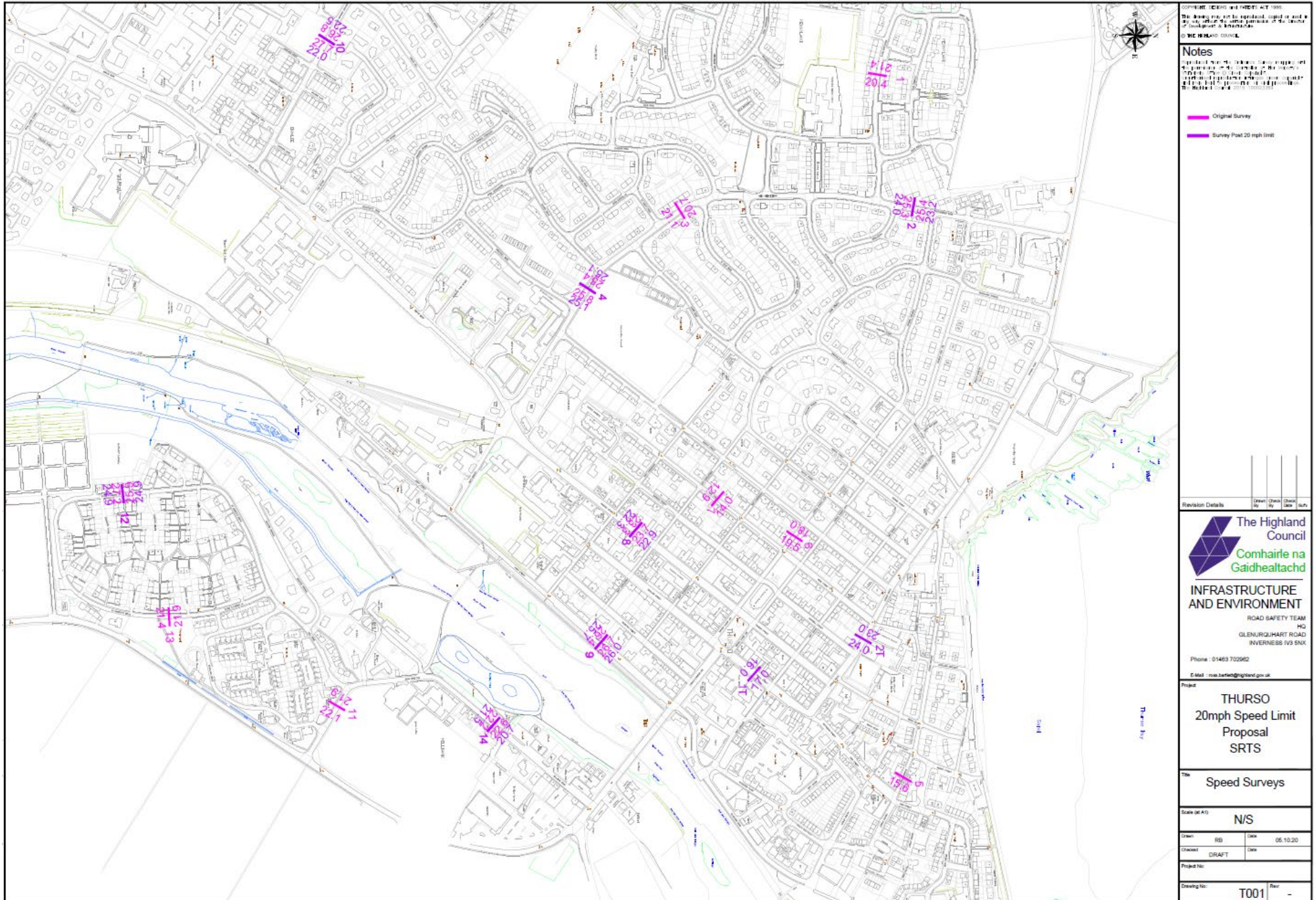
Designation: Executive Chief Officer Infrastructure, Environment & Economy

Date: 17 May 2022

Authors: Lisa MacKellaich (Road Safety Officer)

Background Papers: Appendix 1 - Mean Average Speed Data, Thurso
Appendix 2 - 20mph Scheme Extents
Appendix 3 – Schedule of Roads
Appendix 4 - Table of Representations and Officer Comments
Appendix 5 – Copies of Correspondence

Appendix 1 – Mean Average Speed Data, Thurso



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Notes
 1. This drawing is for the proposed speed limit and is not a legal document. It is intended to provide a visual representation of the proposed speed limit and is not intended to be used as a legal document.
 2. The speed limit is subject to change and is not intended to be used as a legal document.
 3. The speed limit is subject to change and is not intended to be used as a legal document.

- Original Survey
- Survey Post 20 mph limit

Revision Details	Drawn By	Checked By	Date	Scale



INFRASTRUCTURE AND ENVIRONMENT

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Project
 THURSO
 20mph Speed Limit
 Proposal
 SRTS

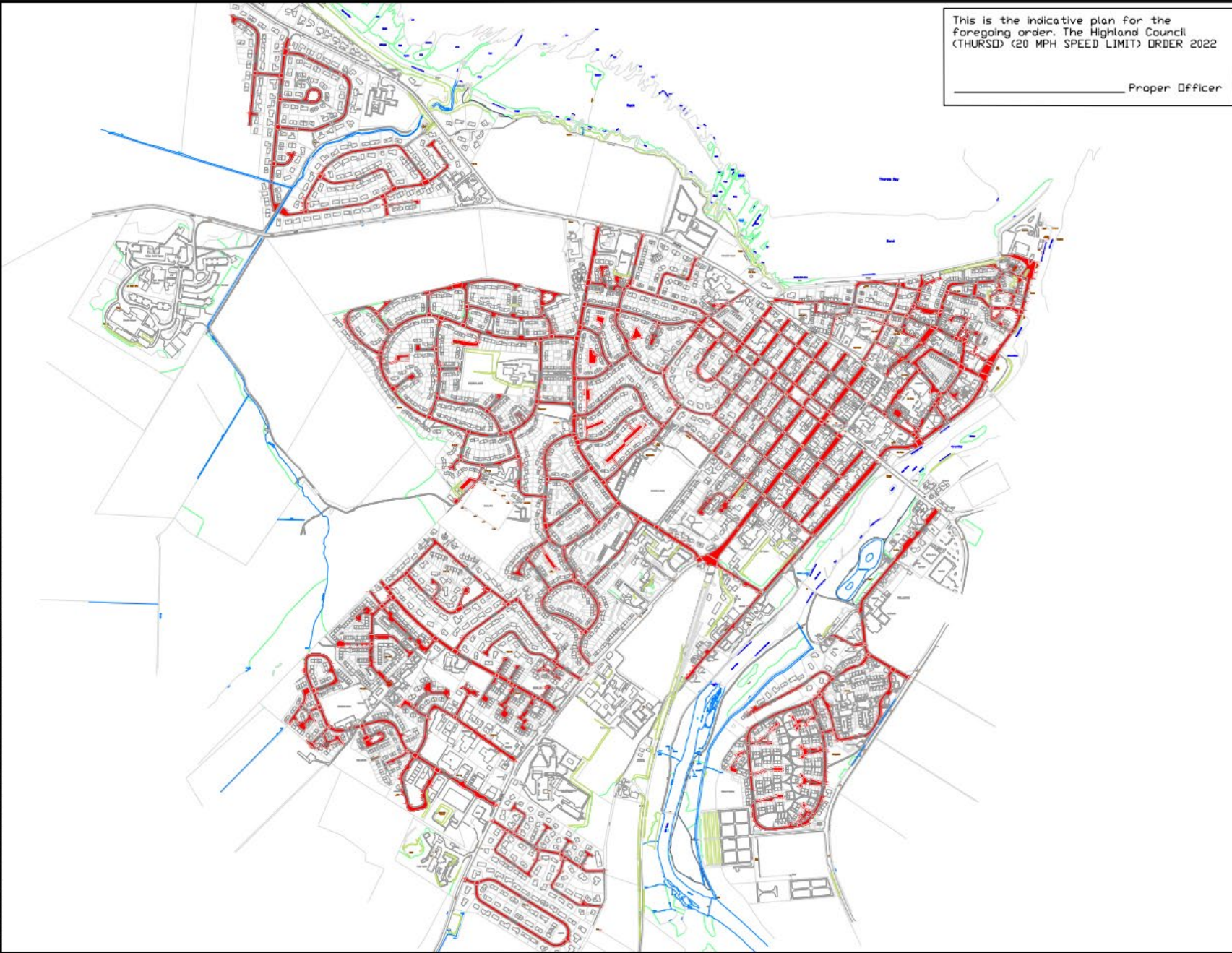
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 Speed Surveys

Scale (if A1):
 N/S

Drawn:	RB	Date:	05.10.20
Checked:	DRAFT	Date:	

Project No:	
Drawing No:	T001
Rev:	-

Appendix 2 – 20mph Scheme Extents



This is the indicative plan for the foregoing order. The Highland Council (THURSD) (20 MPH SPEED LIMIT) ORDER 2022

_____ Proper Officer

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■ Proposed 20 mph limit

Rev	By	Date	Desc

The Highland Council
Comhairle na Gàidhealtachd

INFRASTRUCTURE AND ENVIRONMENT
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**20 mph Speed Limit Proposal
 Spaces for People**

RTO Plan

Scale (if A1) **NTS**

Drawn: RB/LM/Rev Date: 28.11.21

Checked: DRAFT Date:

Project No:

Drawing No: 2 Rev: c

Schedule of Roads

If the Order comes into force, the Order will introduce a 20mph speed limit on the following roads in Thurso over their entire length, unless stated otherwise below:-

U4369 Albyn Court, U3930 Bank Place, U4361 Back Shore Street, U4323 Balimore Place, U3942 Barrock Street, U3952 Bayview Terrace, C1077 Durness Street-Swanson Street-Beach Road, U3964 Beach Court, U5035 Bishops Drive, U3985 Brabster Street, U3987 Braemore Place, U4385 Brilon Court, U3989 Brims Road, U3991 Brownhill Road, U3995 Calder Drive, U3997 Campbell Street, U4321 Cairnmore Place, U3999 Castle Street, Castle Gardens, U4003 Castlegreen Road, U4007 Clarence Street, U4379 College Court, U4381 College Place, U4009 Couper Street, U4011 Couper Square, U4015 Cowie Lane, U4017 Dale Road, U4019 Davidsons Lane, U4021 Dirlot Place, U4377 Donald Grant Road, U4024 Duncan Street, U4022 Dunbar Terrace, U4030 Dwarick Court, U4032 East Church Street, U5460 Falconer Waters Court, U4034 Forss Road, U4036 Fulmar Road, U4040 George Street, U4042 Gerry Square, U4389 Grant Avenue, U4044 Granville Crescent, U4046 Granville Street, U4047 Green Court, U4049 Grove Lane, U4053 Hakon Road, U4057 Heathfield Road, U4367 Henderson Court, U4341 Henderson Street, B877 Rotterdam Street-High Street-Shore Street, Thurso, U4061 Holborn Avenue, U4733 Houston Terrace, U4064 Howburn Road, U4066 Hoy Place, U4345 Ironside Place, C1081 Janet Street-Lover's Lane, Thurso (the said length of road comprises of the following: Lovers Lane and Janet Street), U4072 John Kennedy Drive, U5329 Juniper Drive, U4319 Langland Court, U4074 Langwell Court, U4078 Lythmore Road, U4345 Lord Thurso Court, U4329 Macdonald Green, U4325 Macintosh Place, U4082 Market Square, U4355 Market Lane, U4359 Marine Terrace, U4080 Mansons Lane, U4339 Meadow Lane, U4331 Mears Place, U4345 Meiklejohn Court, U4086 Mill Road, U4396 Mill Terrace, U4092 Millers Terrace, U4090 Millers Lane, U4088 Millbank Road, U4373 Moorside Avenue, U4371 Moorside Court, Morton Court, U4099 Naver Place, U4101 Naver Road, U4402 Neil Gunn Drive, U5040 Ola Drive, U4109 Ormlie Crescent, U4111 Ormlie Drive, U4113 Ormlie Hill, U4337 Ormlie Industrial Site Road, B874 Lochshell-Watten Mains-Poolho-Georgemas-Halkirk-Thurso Road (From its junction with A9 Orlig Street southwest to its junction with Castlegreen Road for a total distance of 650m or thereby the said length of road comprises of the following: Ormlie Road From its junction with U4003 Castlegreen Road to its junction with C1081 Janet Street-Lovers Lane, Thurso, for a distance of 50m or thereby and Princess Street), U5036 Palace Court, U4305 Patersons Lane, U4119 Pennyland Drive, U4127 Pennyland Place, U4121 Pennyland Terrace, U4405 Pentland Court, U4123 Pentland Crescent, U4383 Pollock Place, U5329 Primrose Avenue, U4313 Provost Cormack Drive, U4343 Provost Sinclair Road, U4129 Ravenshill Place, U4131 Ravenshill Road, U4387 River View, U4133 Riverside Place, U4137 Riverside Terrace, U4141 Robertsons Lane, U4139 Robert Dick Place, U4143 Rockwell Crescent, U4147 Rose Street, U5038 Scapa Place, U4161 Scaraben Court, U4186 Seaview Terrace, U4198 Sigurd Road, U4209 Sinclair Street, U5064 Sir Johns Square, U4317 Shebster Court, U4363 Slaughterhouse Lane, U4153 St Magnus Road, U4155 St Marys Road, U4151 St. Andrews Drive, U4157 St Olaf Road, U4159 St Peters Road, U4267 Stainland Drive, U4277 Strathmore Court, U4279 Strathmore Place, U4281 Strathmore Road, U4289 Sweyn Road, U4291 Thorfinn Place, U4293 Thorfinn Terrace, U4295 Thorkel Road, U4315 Thorsdale View, U4297 Tormsdale Place, U4335 Upper Burnside Avenue, U4375 Upper Burnside Court, U4333 Upper Burnside Drive, U4305 West Church Street, U4307 Westfield Terrace, U4311 Wilson Lane, U4309 Wilson Street, U5491 Wolfburn Road, U4303 Vernon Place.

Appendix 4 – Table of Representations and Officer Comments

Representor	Date Received	Summary	Officer Comment
Supporter 1 – Police Scotland	09.12.21	Police Scotland support for 20mph Speed Limit and associated traffic calming proposals.	Welcome support. No further action required.
Supporter 2	24.03.22	Support for 20mph Speed Limit and associated traffic calming proposals.	Welcome support. No further action required.
Objector 1	07.03.22	<p>Objection to 20mph on the following grounds:</p> <ul style="list-style-type: none"> • No mention of problem trying to be resolved. • Evidence from other regions of the UK suggests accidents are not reduced and in fact can increase. • Motorists in the main take heed of the time limited 20mph restrictions at schools but will they pay specific attention when they have been concentrating and getting frustrated for the rest of the time in what were perfectly safe 30mph zones? • I suggest that more attention will be paid to the speedometer in 20 mph zones and less on the road and pedestrians. • Viewing the current 20mph zones in Caithness, apart from schools, there appears to be little compliance. If the whole of Thurso is to be restricted to 20mph all that will be achieved is Highland Council creating large numbers of criminal drivers for no apparent safety improvements. • Accidents generally occur owing to irresponsible driving by those who will take no heed of 30mph or 20mph limits. With virtually no police presence this will persist even if 20mph restrictions are introduced. • The 30mph restriction in built up areas has been in force for many decades and matches comfortable speed, time to get to destinations, driver attention and car performance. Introduction of 20mph restrictions will just cause frustration which can lead to a less relaxed environment with the possibility of increased danger. 	<p>Response letter sent 15.03.22 replying to all the points raised within their objection. Objector was provided with the rationale behind the design and promotion of the 20-mph speed limit including providing an environment that encourages active travel and they were provided with collision statistics detailing the realisation of casualty reduction statistics within 20mph limits. The point that the promotion of a 20mph limit in Thurso is very much in line with the 'Safe System' approach to road safety and casualty reduction being promoted by the Scottish Government and also in line with their policy programme which states '<i>all appropriate roads in built up areas will have a safer speed limit of 20mph by 2025</i>' was also made. Appendix 5 shows the detailed response that was sent to the objector re all the points they made.</p> <p>The Objector replied on 29.03.22 stating they wish their objection to stand and did not want to be involved in any more discussion on the matter.</p>

Appendix 5 – Copies of Correspondence

Supporter 1

[REDACTED]
Sent: 02 February 2022 18:50

To: [REDACTED] (Roads and Transport) [REDACTED]

Subject: Statutory Consultation - Janet Street, Thurso, 20mph Scheme [OFFICIAL]

OFFICIAL

Lisa

Per your email of 27/01/2022 Police Scotland continue to be supportive on the grounds of road safety and reducing casualties.

Kind Regards.

[REDACTED]

Supporter 2

[REDACTED]
2022 20:23

To: Lisa MacKellaich (Roads and Transport) <Lisa.Mackellaich@highland.gov.uk>

Subject: Re: Proposal Feedback on Thurso 20 mph consultation order 2022

Hello,

Thank you for this, and especially for taking the time to reply in detail.

I didn't appreciate the way the 20 mph could be implemented with signs & lines if the speed reduction is self enforcing, that makes sense.

Those painted islands in Tulloch avenue have made an impressive reduction in the average speed! That's great! I had never seen those before.

I am definitely in favour of the plans under consultation. The 20 mph, the traffic calming on Janet street and the islands on Castlegreen road.

Thanks again,

[REDACTED]

On Tue, 29 Mar 2022 at 13:15, Lisa MacKellaich (Roads and Transport) <Lisa.Mackellaich@highland.gov.uk> wrote:

Good afternoon [REDACTED],

Many thanks for your email of support for the proposed Thurso 20 mph Scheme below, it is much appreciated.

To answer the points you have raised in turn:

Many thanks for pointing out the omission of the section of the U4024 that runs between Castlegreen Road and Davidson's Lane from the TRO plan, you are quite correct, we have now rectified this and have attached the updated plan for your info.

With regards to Ormlie Road, once the work has been completed to make the proposed 20 mph speed limit permanent in Thurso (*assuming it gets through this current public consultation phase*) we will revisit this section of Ormlie Road to see what difference has been made to the existing mean average speeds. 20 mph schemes are designed in accordance with statutory guidance and this dictates they should be self-enforcing to ensure that vehicle speeds reflect the speed limit in place and that they do not create an additional burden on enforcement. If existing mean average speeds are 24 mph or below the new 20 mph limit can be introduced with signing and lining only. If existing mean average speeds are higher than 24 mph, traffic calming measures are required to be implemented before a 20 mph limit can be introduced as these measures will ensure the limit is a true reflection of vehicle speeds. Due to the road environment on this section of Ormlie Road, and the lack of direct frontages on the West side of the road, existing mean average speeds at present are too high for a signing and lining 20 mph scheme alone, so would, as it stands require traffic calming. What we will do is see what effect the close proximity of the permanent 20 mph speed limit has on existing mean average speeds at this location and take it from there.

In relation to the Trunk Road, as a Local Roads Authority Highland Council are unable to promote a Road Traffic Regulation Order on the Trunk Road. We are liaising very closely with our trunk road colleagues who are aware of our timescales for making the temporary 20 mph speed limit in Thurso into a permanent one and have asked them to do the same with the section of the network they are responsible for. The hope is that there will be a seamless transition from the temporary order which is currently in place to a permanent one but we lack control over the Trunk Road Section.

Thanks for the support re the proposed traffic calming on Janet Street.

With regards to the proposed Castlegreen Road traffic calming scheme, these will consist of a series of Islands formed in paint which will be located at a number of locations along Castlegreen Road. These will be 1 m wide, varying in length between 6 m – 12 m and will reduce the single carriageway width to a minimum 2.5 m in each direction. These have not been designed as pedestrian crossing locations but as features to bring the existing mean average speed of vehicles down to the acceptable level. The reason for this approach is due to the gradient of Castlegreen Road causing a number of problems when using traditional humps or buildouts. Heavy braking or acceleration on hills like this can cause carriageway degradation and increased noise for residents. Similar features were used to good effect on Tulloch Avenue in Dingwall, as you can see from the image and speed results below it had the desired effect of bringing the existing mean average speeds down. Once the

works have been completed speeds will be monitored approximately 6 months after completion to check compliance and additional works carried out if required.



04 Tulloch Avenue

Down hill

Date	Total	Mean	Vpp 85
20-26/04/21	15240	23.9	27.8
11-17/03/17	18066	27.4	31.1
	-2826	-3.5	-3.3

Up hill

Date	Total	Mean	Vpp 85
20-26/04/21	14250	23.3	27.5
11-17/03/17	15821	27.8	32
	-1571	-4.5	-4.5



Kind regards,

Lisa

From: [REDACTED]

Sent: 24 March 2022 10:55

To: Road Safety <Road.Safety@highland.gov.uk>

Subject: Proposal Feedback on Thurso 20 mph consultation order 2022

CAUTION: This email was sent from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

I write to express my support for the current consultation on the provision of 20 mph speed limits in Thurso.

I note that Duncan Street U4024 between castlegreen road and davidson's lane has not been included in the drawing but is listed on the notice.

I think it should be included and the drawing updated to reflect this.

I see ormlie road is not included for its entire length, just a small section between Castlegreen road and lovers lane/princes street. As this is a route up to the high school and miller academy primary I suggest it should be part of the 20 mph zone.

The A9 through the town has not been included either. I would prefer this to be included as it borders the town and pedestrian traffic is high in these areas.

I am in favour of the 3 build outs and speed bumps on Janet Street C1081 along with pavement extension and dropped kerb.

I am a little confused to what the painted islands along Castlegreen road will do? Are they designated crossing points, or will they have bollards added in future?

Happy to discuss, in general I propose these changes.

Thank you,

[REDACTED]

Objector 1

From: [REDACTED]
Sent: 29 March 2022 22:54
To: Lisa MacKellaich (Roads and Transport) <Lisa.Mackellaich@highland.gov.uk>
Subject: RE: 20mph speed limit proposal for Thurso - Attn Lisa MacKellaich

Dear Ms Lisa MacKellaich,

Thank you for your very comprehensive reply to my objection points. I hope it has not taken up time you could have spend more profitably. On a general point I do not see the point of this consultation if it is Highland Council policy and national policy to introduce it. The decisions have been made already.

I will comment of the numbered points:

Point 1: While you quote many statistics to bolster the introduction of the 20mph limits I am left ignorant of whether these accident rates etc. are significant when judged against traffic flow numbers and road designs. Are the numbers more than what would be expected or less? While not wishing to criticise reduction in accidents all actions have to be judged against statistical and financial parameters. Is the proposal justified compared to other safety improvements in infrastructure?

I do have a concern over the hierarchy diagram. Roads are for vehicular traffic not pedestrians. Pavements are for pedestrians. For roads, ease of flow is a requirement and the interrelationship between these two users is important.

Point 2: Look at the fleetpoint.org website

Point 3: I think this point is a valid query when one looks at the data in my point 2 reference

Point 4: I think it is a point worth considering despite the data you quote

Point 5; I am disappointed to learn that more traffic calming measures might be introduced that cause frustration, avoidance driving, and car suspension damage. Of all the vehicular transport types used by the majority of people the car is the key one. These measures will make Thurso a "car unfriendly" place rather than accepting the car is the main form of transport and catering sensibly for it.

Point 6: Just walk around Thurso at night and observe the illegally exhausted cars racing around. Also see my point 2 reference and note the lack of police presence.

While I realise my objection is irrelevant considering the policy decision already taken, and your response can be interpreted in some ways as contradicting or refuting my propositions I still think they are worth noting by the committee so I do not wish to withdraw them. I note that my original objection and this reply will be anonymised which is commendable.

I do not wish to be involved in any more discussion on this issue.

Yours sincerely,
[REDACTED]

----- Original Message -----

From: "Lisa MacKellaich (Roads and Transport)" <Lisa.Mackellaich@highland.gov.uk>

To: [REDACTED]

Sent: Tuesday, 15 Mar, 2022 At 10:37

Subject: RE: 20mph speed limit proposal for Thurso - Attn Lisa MacKellaich

Good morning [REDACTED],

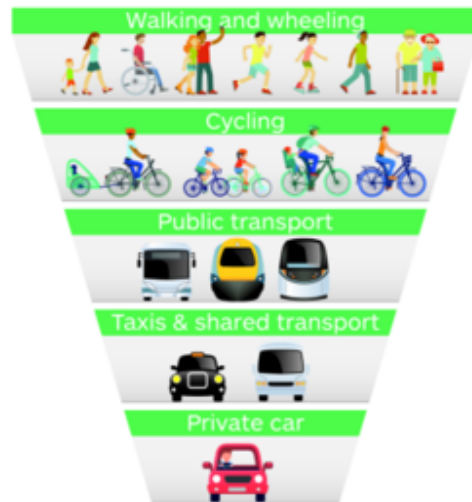
Thank you for your email below re the proposal to make the current temporary 20 mph speed limit in Thurso into a permanent Speed Limit. To answer the points you have raised in turn:

Point 1 - *There is no mention of the problem that is purportedly trying to be solved. Is there an increase in accidents involving cars or pedestrians or both?*

The proposed introduction of a permanent 20 mph speed limit in Thurso is very much in line with the Scottish Governments Road Safety Framework to 2030 which aims to improve road safety for all road users by 2030 with casualty reduction targets to meet accordingly. This vision is based around the modern approach to road safety which focuses on the Safe System approach, with safe speeds being one of the 5 strategic pillars of this system. For more info. on the Safe System visit <https://roadsafety.scot/scotlands-road-safety-framework/framework/the-safe-system/> The focus is very much on spaces being for all road users, not just drivers, and driving appropriately to the surrounding conditions. The recently published 'Scottish Government and Scottish Green Party Shared Policy Programme' includes the commitment that '*all appropriate roads in built up areas will have a safer speed limit of 20mph by 2025. A task group will be formed to plan the most effective route for implementation*' so the direction of travel nationally is for the wider roll out of 20 mph speed limits. Highland Council as an Authority have a programme to introduce 20mph speed limits as a measure to improve road safety and provide an environment to encourage walking and cycling in town centres and residential areas with a number of the Council's Elected Members bringing motions forward to their committees in support of a faster roll out of 20 mph limits around the Council Area.

When looking at Town/village centres Street design should meet the six qualities of successful places (*set out in Designing Places documentation*) namely: distinctive, safe & pleasant, easy to move around, welcoming, adaptable and resource efficient and a reduction in vehicle speeds plays a large part in this. When looking at road use, the **National Transport Strategy** is clear that that the street hierarchy should consider pedestrians first and private motor vehicles last and cater for all people regardless of age or ability.

Prioritising Sustainable Transport



National Transport Strategy

You can see therefore that the reasons behind the promotion of this scheme go well beyond the collisions you have mentioned in your point, the introduction of 20mph limits are not simply about collision reduction but also very much about placemaking and the positive association between 20mph speed limits and the mobility of vulnerable road users. As you have highlighted collisions, looking at the statistics for Thurso an injury collision plot for Thurso for the 5 year period from 03.03.18 – 02.03.22 is attached for your information. As you can see it shows the following:

- 16 collisions in total have been recorded for the Thurso Area with **14** of these being within the proposed 20mph scheme extents over this most recent 5 year period.
- Of these 14 collisions – 13 were slight, 1 serious and 5 involved pedestrians. Only 2 injury collisions have been recorded since the temporary speed limit came into operation on 22.03.21, one of these involving a pedestrian.
- Trends in collision patterns require to be viewed over a number of years to be able to gain a meaningful idea in terms of trend but the impact of the first year of the 20mph scheme is showing an average reduction in collision numbers in Thurso to date.

Scotland's Road Safety Framework to 2030 can be read here <https://roadsafety.scot/scotlands-road-safety-framework/framework/scotlands-road-safety-framework-2030/Road>

Point 2 - Evidence from other regions of the UK suggests accidents are not reduced and in fact can increase. Can you quote evidence of significant accident reduction?

We would welcome you passing on details of the evidence you are referring to here as we have not come across any evidence which suggests reducing vehicle speeds increases the rate of collisions. [Finchet al, \(1994\)](#) concluded that a 1 mph change in mean average is associated with a 5% change in injury collisions. These findings were supported by [Elvik \(2009\)](#) and built on by [Taylor et al, \(2010\)](#) to show approximate reductions as follows for a 1 mph reduction in speed: 6% for urban roads with low average speeds; • 4% for medium speed urban roads and lower speed rural main roads; and • 3% for the higher speed urban roads and rural main roads. To provide you with a more visual example of how the introduction of a 20mph limit has impacted casualty reduction in the Highland Council area this can be seen in Inverness City Centre.



The permanent 20 mph speed limit went live in Inverness City Centre on 14th July 2017.

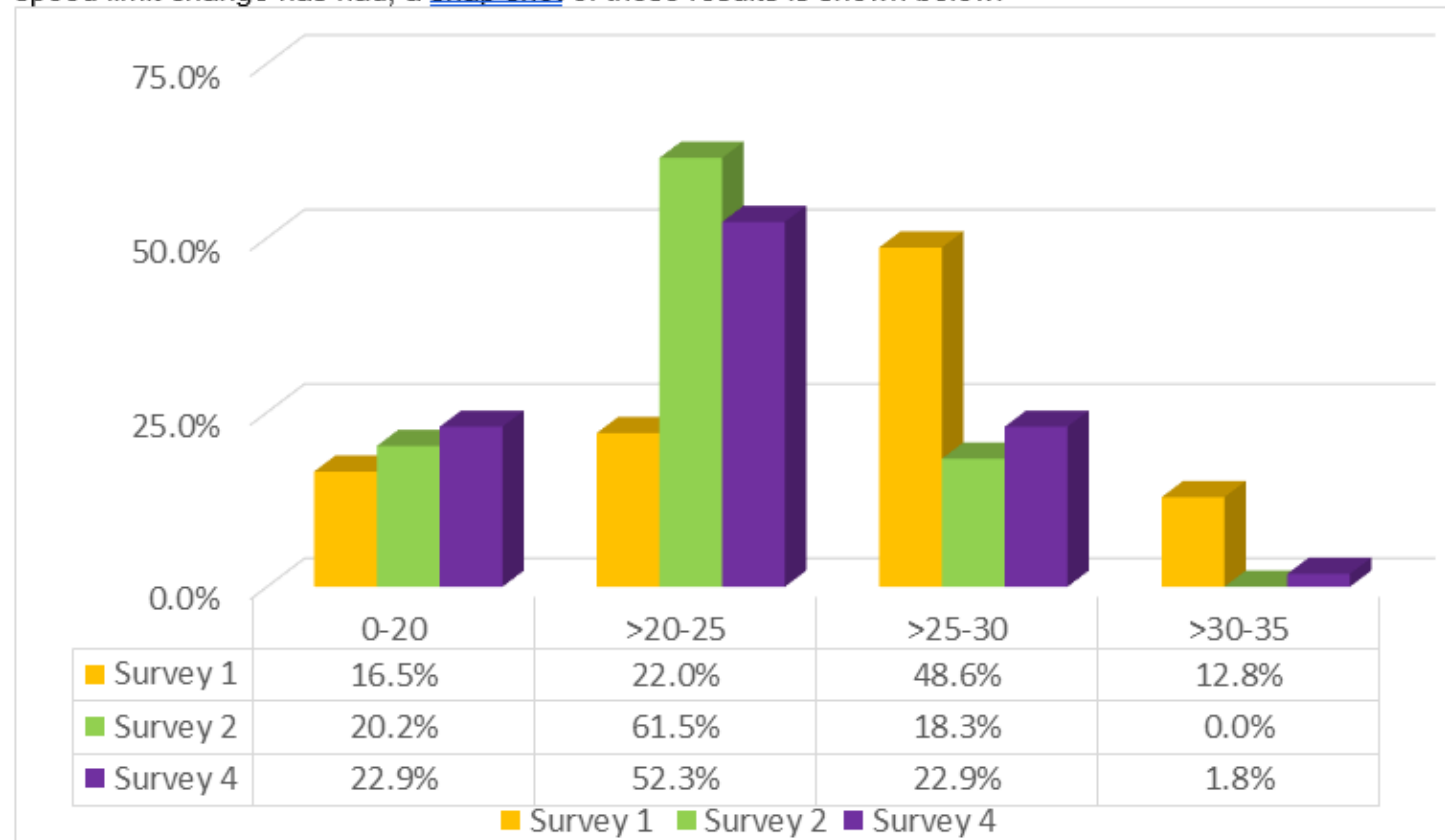
The collision data for the 4 year period, ending December 2016, pre the introduction of the 20 mph is shown on the left. As you can see there were 19 collisions in total, consisting of 1 fatal, 2 serious and 16 slight - within these 17 collisions there were 8 pedestrians and 3 cyclists.

The latest collision data for the 4 year period post implementation, ending Dec 2021 is shown on the right. As you can see this consists of 4 slight collisions, 2 of whom were pedestrians. This is a 79% reduction in the number of injury collisions in the City Centre.

Taking into account that 2 years of the post data were in the pandemic, we have compared this to the Highland wide reduction in collisions over the same 4 year period which for the Council area was 32% so the Inverness scheme is showing nearly a 50% reduction over and above this average.

Point 3 - Motorists in the main take heed of the time limited 20mph restrictions at schools but will they pay specific attention when they have been concentrating and getting frustrated for the rest of the time in what were perfectly safe 30mph zones?

The evidence collated by the Scottish Borders Council is best placed to answer the point you raise here. As you are likely aware the Scottish Borders Council introduced a temporary blanket authority wide 30mph to 20mph speed limit change in 2020 which has now in the main been made permanent. In order to understand the impact of this whole scale change we have been liaising closely with our colleagues in the Scottish Borders Council. Napier University have been evaluating the project so there is significant data with regards to the impact this Authority Wide speed limit change has had, a [snap shot](#) of these results is shown below:



- o **Survey 1** “Before” survey (in August – September 2020)
- o **Survey 2** “After I” survey (November – December 2020 & early 2021)
- o **Survey 3** “After II” survey (April – May 2021)
- o **Survey 4** “After III” survey (June 2021)

- As you can see there has been a sustained drop in vehicle speeds over the entire Council Area and the trial has doubled the proportion of locations with speeds lower than 25mph. The fact that the limit is Council wide has led to less confusion with drivers unsure as to what the speed limit is and therefore a larger overall reduction in Mean Average Speeds. The main headline points that have come out of the Borders project are:
- Overall they have seen a reduction in speeds across the Borders.
- Settlements with highest vehicle speeds have seen the biggest reductions.
- General acceptance by drivers of the need to slow down.
- With default approach very clear to public and lack of confusion.

More info. on their project can be found at <https://www.scotborders.gov.uk/20mph>

Point 4 - I suggest that more attention will be paid to the speedometer in 20 mph zones and less on the road and pedestrians.

Checking vehicle speeds is a normal part of driving and something a driver safely carries out routinely throughout the course of a journey, we have yet to see any evidence or research on this subject area and it is definitely not born out by the road collision statistics for Highland Council area an example of which was provided for Inverness City Centre in Point 2 above. Bellefleur and Gagon (2011) suggests reducing vehicle speeds increases the drivers' field of vision making them more aware of their surroundings not less as you have intimated. Additionally reducing vehicle speeds reduces the vehicle stopping distance so this would suggest a driver traveling at 20 mph is more likely to perceive a hazard earlier than a driver at 30 mph but also requires less distance to come to a stop. This evidence would suggest that if additional time is required to glance at a speedometer a driver traveling at 20 mph has more time and information available to them to do this safely. The introduction of 20mph limits is also very much supported by Police Scotland.

Point 5 - Viewing the current 20mph zones in Caithness, apart from schools noted above, there appears to be little compliance. If the whole of Thurso is to be restricted to 20mph all that will be achieved is Highland Council creating large numbers of criminal drivers for no apparent safety improvements.




See attached the existing speed data for Thurso for your info. When designing schemes the Authority is required to adhere to guidance with the key points to note being:

- Designed to be self-enforcing to ensure that vehicle speeds reflect the speed limit in place and do not create additional burden on enforcement.
- If existing mean average speeds are 24 mph or below the new 20 mph limit can be introduced with signing and lining only. If existing mean average speeds are higher than 24 mph, traffic calming measures are required to be implemented before a 20 mph limit can be introduced as these measures will ensure the limit is a true reflection of vehicle speeds.
- Existing mean average speeds have therefore shaped the look of the proposed 20 mph limit for Thurso.

Speeds after implementation of a 20 mph scheme are monitored and remedial works to aid compliance are implemented as necessary.

Point 6 - Accidents generally occur owing to irresponsible driving by those who will take no heed of 30mph or 20mph limits. With virtually no police presence this will persist even if 20mph restrictions are introduced.

Although it is true according to the Organisation for Economic Co-operation and Development -OECD (2008) that 90% of collisions are attributed to driver behaviour there is no corresponding evidence to suggest these drivers are also people who disobey the speed limit. The most common causation factor recorded in injury collisions in Thurso in the 2017-20 time period was Drivers, Riders or Pedestrians failing to look properly, this is evident in most urban collision analysis. Reducing the vehicle speeds in towns and villages means other road users have more time to react if someone does pull out in front of them and any resulting collision will be at lower speeds resulting in reduced collision severity. I think it is important to remind ourselves of the evidence in terms of collision severity produced by RoSPA and TMS as detailed below:

Pedestrians Involved in Road Traffic Collisions	
40 mph	 85 % KILLED 15%
	In collisions at 40 mph, 85% of pedestrians are killed, 15% are seriously injured and nobody escapes unhurt.
30 mph	 45 % KILLED 50% INJURED 5
	In collisions at 40 mph, 45% of pedestrians are killed, 50% are seriously injured and 5% escape unhurt.
20 mph	 5 65% INJURED 30% UNHURT
	In collisions at 40 mph, 5% of pedestrians are killed, 65% are seriously injured and 30% escape unhurt.

Looking at the statistics in terms of Pedestrians involved in Road Traffic Collisions – it is worth noting that:

- At 40 mph you have a 15% chance of survival
- At 30 mph you have a 55% chance of survival
- At 20 mph you have a 95% chance of survival

The idea behind the safe system approach to road safety design mentioned in Point 1 above is to ensure that when mistakes are made by people these do not result in fatal or serious injuries and reducing the speed limit plays a major factor in reducing the severity of collisions.

Point 7 - The 30mph restriction in built up areas has been in force for many decades and matches comfortable speed, time to get to destinations, driver attention and car performance. Introduction of 20mph restrictions will just cause frustration which can lead to a less relaxed environment with the possibility of increased danger.

In The World Health Organisation’s Pedestrian Safety Manual, which uses case studies from around the world it states that ‘One of the most effective ways to improve pedestrian safety is to reduce the speed of vehicles’ and specifically listed is to ‘implement area-wide lower speed limit programmes for example 20mph’. The environment should be looked at from all users perspectives not just a drivers perspective, in some circumstances journey times have been shown to improve at 20mph as traffic flows more freely than at 30 mph

https://www.20splenty.org/20mph_limits_save_time_and_improve_traffic_flow, info. from the Scottish Borders states that ‘it has been shown that

the difference between driving at 20mph and 30mph is an additional 60 seconds for each mile covered in built up areas assuming that a constant speed of 30 mph was possible before the 20 mph limit was put in place' thus the impact on journey time is negligible. Our own speed surveys carried out as part of the design process for the 20 mph limit in Thurso have shown that the mean average speed of vehicles is well below 30 mph with some streets showing averages as low as 13 mph. Generally the mean average speeds in the area of the proposed 20 mph speed limit were in the range of 17-23 mph when the speed limit was 30 mph in Thurso. This would suggest the introduction of a permanent 20 mph speed limit will have very little impact on journey times through the town.

I hope this provides you with more insight into the rationale behind the decision making process with regards to the introduction of a permanent 20mph speed limit in Thurso. This is a proactive approach to improve the area for all road users including the most vulnerable in society.

The consultation currently underway for this speed limit reduction in Thurso, to which to date I confirm that you are the only objector, is a statutory legal process. We hope you will now consider withdrawing your objection however if you do not feel you can withdraw your objection to the proposals, the next stage of this formal process is for your objection to be heard by the Elected Members at the Caithness Area Committee Meeting. The next meeting following the closure of the public consultation period is not until 8th June 2022. Copies of all correspondence pertaining to your objection will be anonymised and contained within the papers that go to this Committee. Due to the delays caused by waiting for committee dates we are always keen to work with objectors to see if there is a way we can work together to resolve outstanding objections, with this in mind we are happy to discuss this with you on the phone should you feel this will help so please feel free to call or arrange a time we can call you to discuss your objection.

I look forward to hearing from you.

Regards,
Lisa

References:

Bellefleur, O and Gagnon, F (2011); Urban Traffic Calming and Health, National Collaborating Centre for Healthy Public Policy

Elvik R, (2009) The Power Model of the Relationship between Speed and road Safety: Update and new Analyses.

Finch, D.J et al (1994); Speed, Speed Limits and Accidents. Project Report 58. Transport Research Laboratory (TRL).

Taylor, M.C, Lynam D.A and Baruva. A (2010); The effects of drivers' speed on the frequency of road accidents. TRL Report 421.

From: [REDACTED]

Sent: 07 March 2022 21:08

To: Road Safety <Road.Safety@highland.gov.uk>

Subject: 20mph speed limit proposal for Thurso - Attn Lisa MacKellaich

CAUTION: This email was sent from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Madam,

I wish to object to this proposal for the following reasons:

1. There is no mention of the problem that is purportedly trying to be solved. Is there an increase in accidents involving cars or pedestrians or both?
2. Evidence from other regions of the UK suggests accidents are not reduced and in fact can increase. Can you quote evidence of significant accident reduction?
3. Motorists in the main take heed of the time limited 20mph restrictions at schools but will they pay specific attention when they have been concentrating and getting frustrated for the rest of the time in what were perfectly safe 30mph zones?
4. I suggest that more attention will be paid to the speedometer in 20 mph zones and less on the road and pedestrians.
5. Viewing the current 20mph zones in Caithness, apart from schools noted above, there appears to be little compliance. If the whole of Thurso is to be restricted to 20mph all that will be achieved is Highland Council creating large numbers of criminal drivers for no apparent safety improvements.
6. Accidents generally occur owing to irresponsible driving by those who will take no heed of 30mph or 20mph limits. With virtually no police presence this will persist even if 20mph restrictions are introduced.
7. The 30mph restriction in built up areas has been in force for many decades and matches comfortable speed, time to get to destinations, driver attention and car performance. Introduction of 20mph restrictions will just cause frustration which can lead to a less relaxed environment with the possibility of increased danger.

Yours faithfully,

[REDACTED]