Agenda Item	6
Report No	ERA/18/22

HIGHLAND COUNCIL

Committee: Easter Ross Area

Date: 8 November 2022

Report Title: Invergordon 20mph Speed Limit and the Supporting Traffic

Calming

Report By: Executive Chief Officer Infrastructure, Environment & Economy

Purpose/Executive Summary

1.1 This report asks Members to discharge the authority's duty to consider the objections submitted to the proposed 20mph speed limit order in Invergordon and the associated traffic calming, which were properly submitted and not withdrawn before deciding whether to approve the making of the Road Traffic Regulation Order "The Highland Council (Invergordon) (20mph Speed Limit) Order 2022" and the construction of the supporting traffic calming.

2 Recommendations

2.1 Members are asked to:-

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- i. **Note** the background to the proposed 20mph speed limit order and supporting traffic calming in Invergordon;
- ii. **Consider** the objections made to The Highland Council (Invergordon) (20mph Speed Limit) Order 2022 in accordance with the regulations and not withdrawn:
- iii. **Consider** the objections made to the supporting traffic calming in accordance with the regulations and not withdrawn;
- iv. subject to i), approve the making of the Road Traffic Regulation Order; and
- v. subject to ii), **approve** the construction of the traffic calming in Invergordon.

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.
 - There is a requirement for outstanding objections to traffic calming proposals to be considered by the Roads Authority. This report sets out the objections received for consideration and is seeking approval to construct.
- 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 and the construction of the traffic calming is not approved there is an increased risk of noncompliance with the new 20mph speed limit meaning the extents of the proposed 20mph speed limit will have to be reviewed.
- 3.6 **Gaelic** There are no Gaelic implications.

4. Background

- 4.1 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 aged 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 Invergordon (see **Appendix 1**) and as a result of the mean average speeds being recorded above 24mph a series of traffic calming measures were designed around Invergordon as follows:- raised tables and speed cushions on Castle Avenue; speed cushions on Strath Avenue and King George Street; priority give way build outs with uncontrolled pedestrian crossing points on Cromlet Drive and priority give way built outs on Academy Road. Two objections were received with regards to the proposed traffic calming one of which also objected to the 20mph Road Traffic Regulation Order.
- 4.5 There is one outstanding objection to the making of the Road Traffic Regulation Order and two objections to the construction of the traffic calming.

5. Consultation

- 5.1 A draft RTRO entitled "The Highland Council (Invergordon) (20mph 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; and **Appendix 3** Schedule of roads.
- 5.2 Consultation plans were produced for the proposed traffic calming. **Appendix 4** plans detailing traffic calming proposals for Academy Road, Cromlet Drive, Castle Avenue, Strath Avenue and King George Street.
- 5.3 Elected Members were consulted prior to statutory consultation taking place. Statutory consultation then took place with the Emergency Services, Community Council, Freight Transport Association, Road Haulage Association, Highland Cycle Campaign and Bus Companies and the proposals were then advertised in the local press for the period 5 August to 5 September 2022.

6. Representations

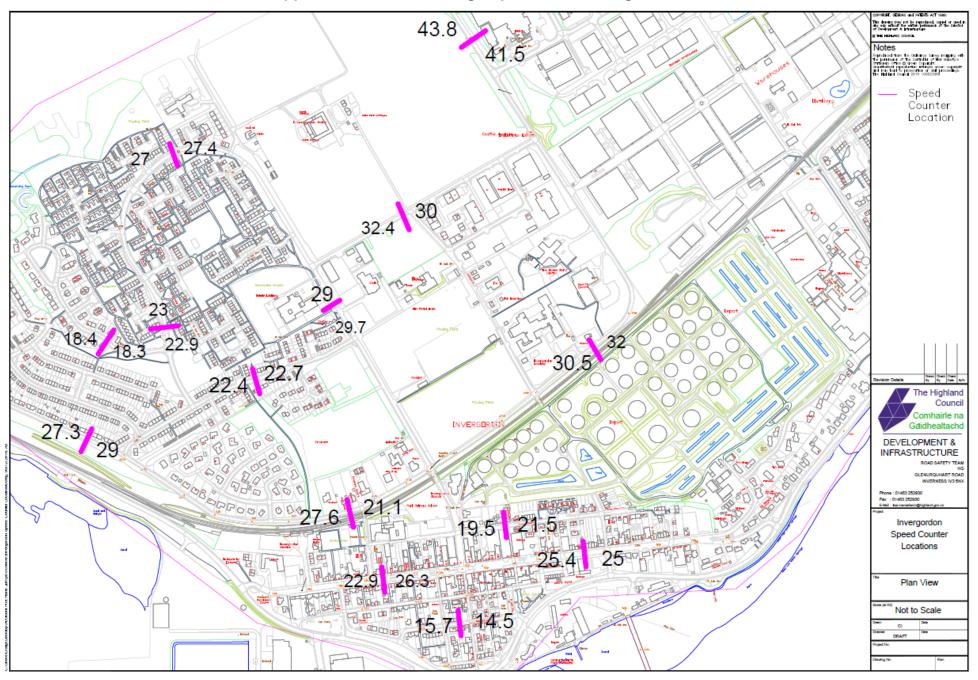
- 6.1 The Highland Council has received one objection to the making of the 20mph RTRO and two objections to the proposed traffic calming in Invergordon. The Authority has been unable to resolve these objections. One note of support was received from Police Scotland to the proposals.
- A summary of the representations and officer comments is set out in the table in **Appendix 5**. Copies of the representations and communications are provided at **Appendix 6**.
- 6.3 In view of the desire to make progress with making permanent the 20mph limit in Invergordon with the aim of delivering a self-enforcing speed limit, this report is being brought to Committee to seek approval for the making of the Road Traffic Regulation Order and construction of the supporting traffic calming.

Designation: Executive Chief Officer Infrastructure, Environment & Economy

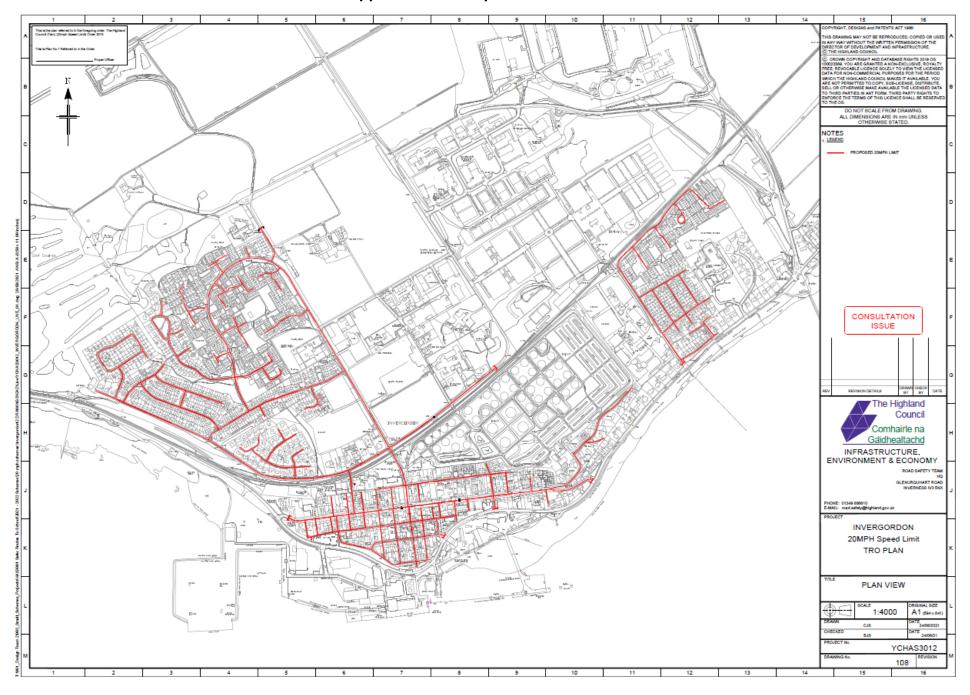
Date: 7 October 2022

Authors: Ross Bartlett, Road Safety Technician

Appendix 1 – Mean Average Speed Data, Invergordon



Appendix 2 – 20mph Scheme Extents

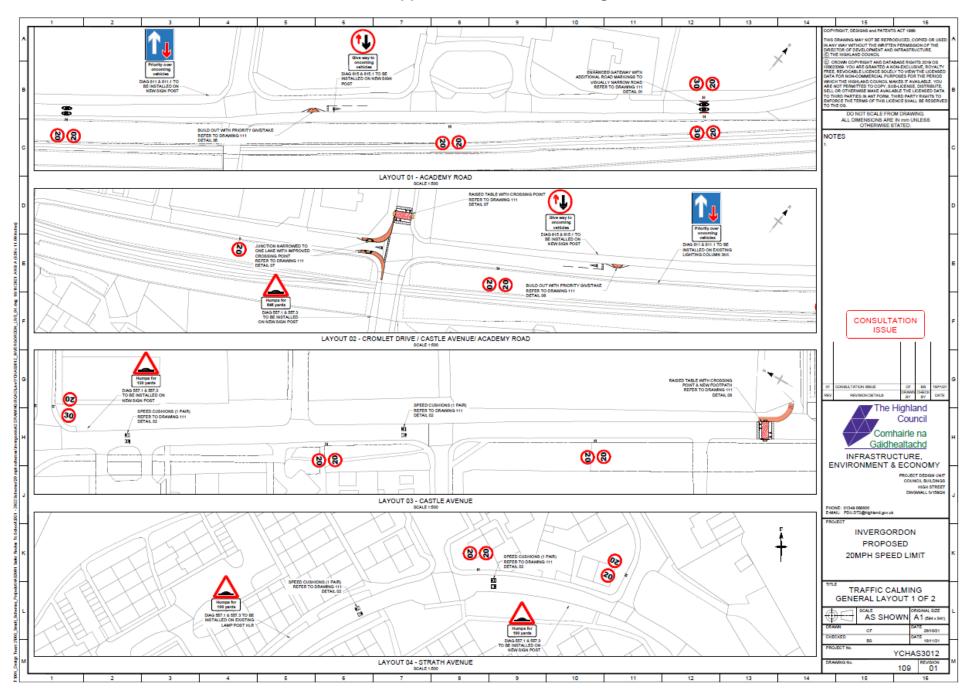


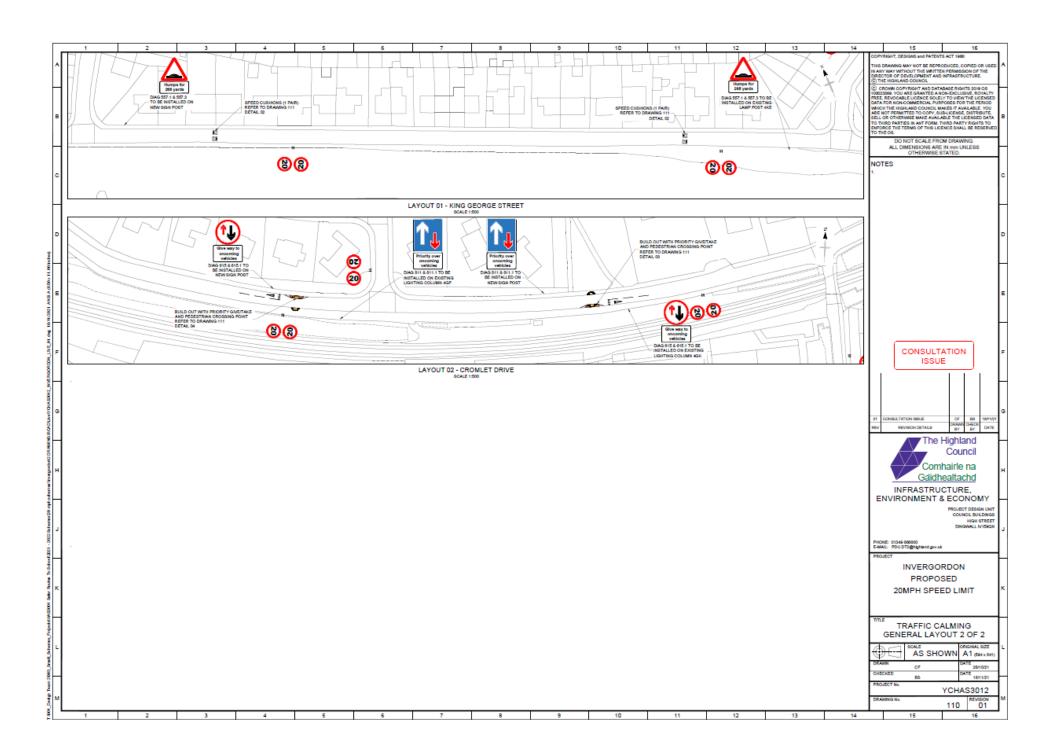
Appendix 3 - Schedule of Roads

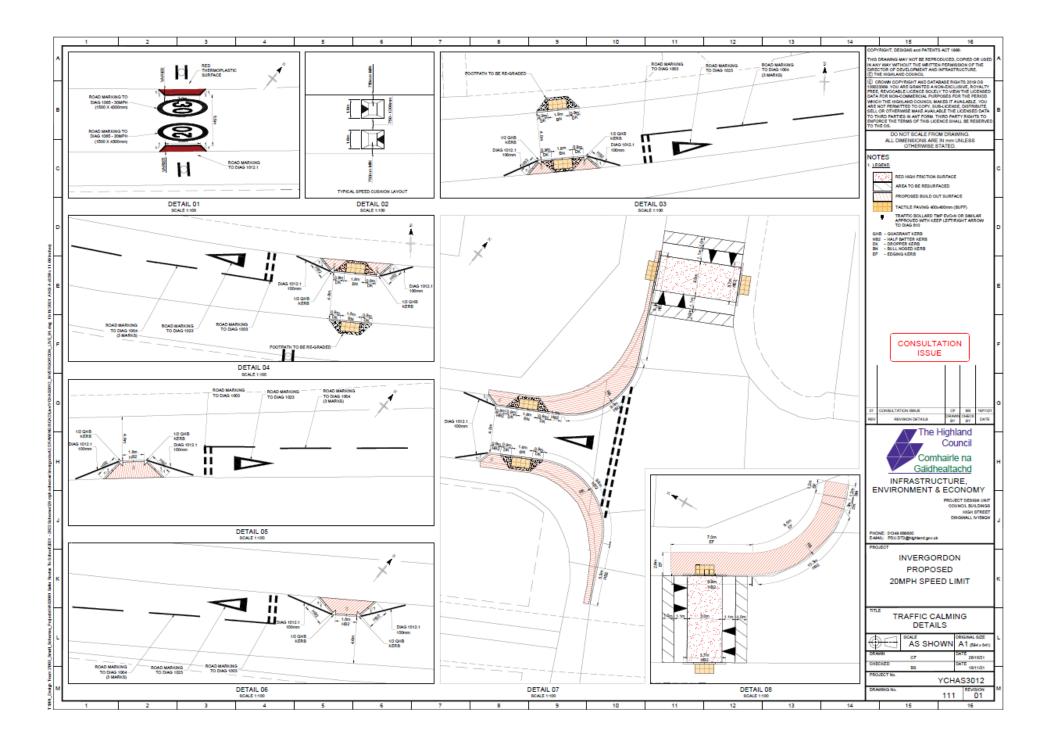
If the Order comes into force, the Order will introduce a 20mph speed limit on the following roads in Invergordon over their entire length, unless stated otherwise below:

U4236 161-163 High Street; C1063 Academy Road, from its junction with Castle Avenue/Castle Road eastward for 458 meters or thereby; U4275 Agincourt; U4168 Albany Road; Ardross place; U4184 Bank Street; U4207 Bellfield; U4173 Bermuda Road; U4165 Birchwood; U4200 Blackpark Avenue; U4227 Bowling Green Access Road; U4206 Caberfeidh Drive; U4192 Cadboll Road; U4169 Castle Avenue; U4272 Castle Close; U4271 Castle Place; C1212 Castle Road; U4185 Clyde Street; U5603 Colonel Mackenzie Drive; U4167 Cromlet Drive; U4274 Cromlet Park; Dewdale Court; U4193 Elliot Road; Ferry Row; U5602 Fleming Way; U5090 Fraser Road; U4170 Gordon Terrace; U4201 Gordon place; U4191 Grosvenor Street; U4190 Golf View Terrace; U5607 Harbour View; C1210 High Street, from a point 38 meters or thereby east of its junction with the B817 (Alness to Invergordon Road), extending eastward along High Street for 1054 meters or thereby to a point 30 meters or thereby west of its junction with the B817/Saltburn Road junction; U4189 Hugh Millar Street; U4195 Inglis Road; U4196 Inverbreakie Drive; U4178 Joss Street; Kilmuir Place; C1211 King Street; U4166 King George Street; U4215 Lane between 2 and 4 High Street; U4216 Lane between 8 and 10 High Street; U4217 Lane between 16 and 18 High Street; U4218 Lane between 24 and 26 High Street; U4222 Lane between 50 and 52 High Street to Shore Road, U4212 Link Road; U4172 Link Road; U4205 MacDonald Road; U4183 Mackay Street; U4208 Mains Avenue; U4234 Martin's Lane; U4182 Mill Street; U4180 Munro Street; U4194 Murray Road; U4537 Natal Place; U4204 Ness Gardens; U4224 Normans Lane; U4197 Ord Terrace; U4188 Outram Street; U4230 Park Lane; U4226 Park Lane Access Road; U4231 Post Office Lane between 57 and 59 High Street; U4171 Queen Street; U4203 Reid Road; U4225 Robertson Lane; U4223 Ross Street; U4211 Rosskeen Drive; U4276 Royal Oak Drive; U4181 Seabank Road; U4176 Seaforth Crescent; U4219 School Lane; U4229 School Access Lane; U4214 Shore Road (West); U4213 Shore Street (East); U4202 South Lodge Distributor Road; U4228 Tennis Court Access; U4179 Tomich Road; U4269 Westwood; U4237 Wyvis Court.

Appendix 4 – Traffic Calming Plans







Appendix 5 – Table of Representations and Officer Comments

Representor	Date Received	Summary	Officer Comment
Supporter 1 –	29.08.22	Police Scotland support for 20mph Speed Limit and	Welcome support.
Police		associated traffic calming proposals.	No further action required.
Scotland			
Objector 1	05.09.22	Objection to 20mph speed limit on Castle Avenue, King	Response letter sent 30.09.22 replying to all
		George Street, Cromlet Drive and Academy Road on the following grounds:-	the points as follows:-
			Provided the rationale behind the
		These are main arterial routes to various housing	Highland Council 20mph programme
		developments and not appropriate for a 20mph speed	and the design guidance being followed.
		limit.	Castle Avenue, King George Street,
		The roads passed the schools already have a part time	Cromlet Drive and Academy Road have
		20mph speed limit which is more appropriate.	been included in the RTRO due to the
		20mph on these roads will result in poor compliance with the speed limit.	fact they are all main route for active travel users to access schools, leisure
		the speed lithit.	facilities and the High Street.
		Objection to the traffic calming on the following grounds:-	Explanation provided; King George
		greating greating greating	Street was included due to the fact the
		Speed bumps on King George Street are not required	vehicle speeds were higher than the
		because parked cars already act as traffic calming.	targeted 24mph for implementation a
		Cromlet Drive buildouts are going to cause a safety	limit without traffic calming.
		hazard with drivers accelerating to beat oncoming traffic	There is no evidence to support the
		through the narrowing; volume of traffic does not merit	comment that Cromlet Drive features
		their use; will hinder the use of the area for picking up and	will increase collisions there has been
		dropping off at the Station; increased emissions from	no increase in risk at similar features in
		idling vehicles waiting for oncoming traffic.	Highland.
		Academy Road build out will cause frustration at school times.	
		times.	Council prioritises design for the benefit of pedestrians and other active travel
		General objection to speed bumps damaging vehicles suspension.	users over the private motor vehicle.
		No collision history on these roads so measures not required.	

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	Objector 2	05.09.22	Objection to the traffic calming in Invergordon with specific mention of King George Street and Cromlet Drive on the following grounds:-	Response letter sent 30.09.22 replying to all the points as follows:-
			 Speed bumps on King George Street are not required because parked cars already act as traffic calming. Due to parked cars drivers will not be able to negotiate the speed cushions straight on as intended resulting in increased damage. Increase noise pollution for residents. Cromlet Drive traffic calming will cause problems for pick up and drop off for people accessing the Station, increase risk to pedestrians in the area, poor visibility at the build out. 	 Provided the rationale behind the Highland Council 20mph programme and the design guidance being followed. Explanation provided; King George Street was included due to the fact the vehicle speeds were higher than the targeted 24mph for implementation a limit without traffic calming. King George Road has ample forward visibility so drivers should have no issue lining up to negotiate the speed cushions at the correct angles. Cromlet Drive build outs have adequate visibility for vehicles driving at the correct speed to negotiate them safely, the presence of the build outs will provide protection for vehicles stationary carrying out Station drop off. Both buildouts also include uncontrolled pedestrian crossing points making it easier for pedestrians to cross the road in this area.

Appendix 6 - Copies of Correspondence

Supporter 1 - Police Scotland

Sent: 25 August 2022 19:45

Subject: RE: Consultation - Invergordon - Proposed 20 mph & 30 mph Speed Limit Order and associated Traffic Calming [OFFICIAL]

OFFICIAL

Good evening

I am supportive on this proposal on the basis that these location are within built-up / residential developments.

I've added in some detail below which makes clear the Police Scotland position on 20mph speed limit enforcement -

There is a need to prioritise the deployment of police resources to those sites which represent the greatest risk. Any decision to lower the speed limit to 20 mph should seek to avoid the need for extensive police

enforcement. As such, 20 mph limits will not routinely be enforced unless it is considered absolutely necessary and in the interest of casualty reduction. The only exception to this will be the enforcement of 20 mph speed limits outside schools which will continue on a regular basis. It should also be recognised that the introduction of a 20 mph speed limit is one method of speed management and should **not** be implemented in isolation, but considered alongside a range of other measures to manage speed, improve safety, and meet other objectives including the encouragement of active travel. Such measures include engineering / landscaping standards that seek to protect vulnerable road users and are designed to raise a driver's awareness of their environment/surroundings as well as education through driver information, training and publicity.

Factors that should be considered are:

- road/street functions including whether streets contain shops and/or residential housing, volumes of traffic, bus services, local access, formal walking and cycling routes.
- composition of road users including existing and potential levels of vulnerable road users.
- existing traffic speed.
- collision data including frequency, severity, types and causes.
- road environment including road + footpath width, sightlines and road layout (bends, junctions, presence of pedestrian crossings).
- Community including consultation with emergency services, public transport providers and impact on residents (usage of road, parking facilities, noise / air quality).

Should a 20mph speed limit be implemented, changes in driver behaviour should be monitored and where compliance levels are not at an acceptable level, consideration should be given to the addition of traffic calming measures or if necessary, reverting to a 30 mph limit.

Thanks

Inspector Highland and Islands Road Policing Police Scotland Dingwall

Objector 1

Ross Bartlett Road Safety Technician, Highland Council

I would like to object to the proposals of traffic calming measures in Invergordon and an objection to the 20mph speed reduction on Castle Avenue, King George Street, Cromlet Drive and Academy Road.

The roads I have mentioned above are the main arteries to the various housing developments and do not require speed reduction measures or 20mph at all times. Around the housing I feel that 20mph is appropriate, but not these roads. I believe that if you set the speed limit to 20mph around these roads at all times, then more than likely, most drivers will still drive above the new proposed speed limit, as has been seen in the Streets of Edinburgh where it is 20mph in most places. This concerns me as these roads, excluding King George Street, run past the schools in the town. The 20mph flashing signs during school opening, lunch and closing times focus drivers to reduce their speed at these times, but I feel that if it is constantly 20mph, drivers will ignore the speed limit as their mind hasn't been focused on the risk of school children.

The proposals for speed bumps at King George Street are not required as there are cars parked at the side of the street, which already act as traffic calming measures.

The Cromlet Drive build outs with give way are more of an accident hotspot than a safety measure. I have seen cars speed up trying to beat the oncoming car to the give way build out. The volume of traffic on this road also does not merit a give way build out. They will also cause more of a hinderance as cars usually park outside the train station waiting to pick rail passengers up. The recent failure of the Dingwall give way build outs should highlight that residents do not want these or feel they are necessary. Finally in the age of trying to reduce our carbon footprint, these give way build outs increase unnecessary idling of cars causing more pollution. I don't feel these measures are necessary.

The Academy Road build outs are also going to cause frustration and accidents especially around school opening and closing times due to the volume of traffic. Setting 20mph flashing lights during these times are more effective as a safety measure.

Castle Avenue again is a main artery running past two schools. Setting 20mph flashing lights during school times will be more effective than a permanent 20mph limit. To improve this road, painting double yellow lines down the length of this road would act as a better safety measure to prevent cars parking here, causing cars to meet at the brow of the hill as the road is reduced to one lane when cars park here.

The speed bumps proposed damage cars suspension and increase the number of times a car has to accelerate in a short distance.

If there were several near misses on these roads, I could understand the need for these measures, but in the 30+ years I have been a resident I can not recall an incident of a vehicle hitting a pedestrian on the 4 roads I have mentioned.

Overall, I feel that these 4 roads should not have the proposed measures and speed limits introduced as they are not as built up as the rest of the town. This seems like a lot of money to be spent when there is not a requirement for the measures or speed restrictions on these 4 roads.

Kind regards

Officer reply to Objector 1

Thank you for taking the time to submit your objections to the proposals in Invergordon.

The introduction of a 20mph speed limit in Invergordon along with the associated Traffic Calming is in line with the Council's programme to introduce 20 mph speed limits around the Council Area. It is also in line with the Scottish Government and Scottish Green Parties Shared Policy Programme' published on 1st September 2021 which includes the commitment that 'all appropriate roads in built up areas will have a safer speed limit of 20 mph by 2025. To date more than seventy, 20 mph limit schemes, across the Highland Council Area have been successfully implemented. The programme for delivery has been based on collision history and the ethos of the implementation is to reduce the number and severity of accidents that occur on Highlands Roads, whilst creating an environment that encourages sustainable and active travel.

When designing 20 mph 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'. When installing these 20 mph limits, the existing mean average vehicle speeds should be below 24 mph to enable the 20 mph limit to be installed without traffic calming. Existing speed data for Invergordon were recorded over a 7 day period and results show the existing mean average speeds to be more than 24 mph on all the streets where traffic calming has been proposed.

The roads you have mentioned have been included because leaving them at 30 mph creates a barrier to active travel between the housing development and the schools, leisure facilities and the High Street. The aim of including these roads is to make crossing or using them while traveling actively more appealing to encourage more people to walk or wheel for short journeys around the town.

With regards to the raised tables these have a fairly shallow ramps and only raise around 70 mm over 1100 mm and when they are used in a 20 mph speed limit if driven at the correct speed there is little need to reduce speed and accelerate again. These are not the type of raised tables or humps you may be familiar with in carparks which have a much steeper ramp. These features are designed to prioritise the pedestrian routes to the Academy and Leisure facilities and reduce speeds on a road that is a link into the town centre for many making them more pleasant spaces to use active travel. 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 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

When designing traffic calming, we try and use the most appropriate type of traffic calming for the route selected, priority give way features work well at reducing vehicles speeds and with the traffic volumes recorded on the streets we have proposed their use we do not expect to see a significant build-up of traffic. We have been using these in Highland Council for several years successfully and we have not seen any evidence they create an increased risk of collision.

If you do not feel you have been provided enough information to withdraw your objection the next stage of this formal process is for your objection to be heard by the Elected Members at the Easter Ross Area Committee Meeting, on the 24th of November 2022. Copies of all correspondence pertaining to your objection will be anonymised and contained within the papers that go to this Committee.

We look forward to hearing from you.

Ross Bartlett

Objector 2

I would like to object to the planned traffic calming measures proposed for Invergordon, specifically the speed cushions on King George Street and the build-outs at Cromlet.

With regards to King George Street, my objection is based on the fact that the majority of residents in this street park their vehicles on the Northerly side of the road which in itself limits the speed of passing traffic. This will mean in many instances, traffic negotiating the speed cushions will approach the cushions at a 45 degree angle as they cross the carriageway to pass parked cars, which is not how these calming measures are designed and risks damage to vehicle tyres and suspension. The residents of the adjacent properties will be subjected to increased noise pollution as vehicles slow, cross the cushions and accelerate away.

Regarding the Cromlet proposals, one can only point to the shambles that exists in Maryburgh where the build-outs are situated near blind corners as would be the case on the Westernmost build-out. The Southern side of this carriageway between these build-outs is a popular drop-off/pick up point for Rail passengers and this will cause passing traffic difficulty negotiating the narrowed carriageway and increase risk to pedestrians.

None of the proposals take into account the increased vehicle emissions that will occur as vehicles travel through Invergordon, which surely goes against the Scottish Governments Green credentials. There is no history of accidents in any of these locations that I am aware of, especially none involving pedestrians, so cannot see why these blanket measures are required.

Regards

Officer reply to Objector 2

Thank you for taking the time to submit your objections for the proposals in Invergordon.

The introduction of a 20mph speed limit in Invergordon along with the associated Traffic Calming is in line with the Council's programme to introduce 20 mph speed limits around the Council Area. It is also in line with the Scottish Government and Scottish Green Parties Shared Policy Programme' published on 1st September 2021 which includes the commitment that 'all appropriate roads in built up areas will have a safer speed limit of 20 mph by 2025. To date more than seventy, 20 mph limit schemes, across the Highland Council Area have been successfully implemented. The programme for delivery has been based on collision history and the ethos of the implementation is to reduce the number and severity of accidents that occur on Highlands Roads, whilst creating an environment that encourages sustainable and active travel.

When designing 20 mph 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'. When installing these 20 mph limits, the existing mean average vehicle speeds should be below 24 mph to enable the 20 mph limit to be installed without traffic calming. Existing speed data for Invergordon were recorded over a 7 day period and results show the existing mean average speeds to be more than 24 mph on all the streets where traffic calming has been proposed.

With regards to your concerns of traffic not being able to line up on the speed cushions on King George Street, there is ample visibility on this road meaning vehicles can pull out if required to pass a parked car and line up correctly with the proposed traffic calming. The speeds recorded on King George Street do not suggest that the parked vehicles are having a significant effect on traffic speeds as traffic was recorded at 27.3 mph and 29.0 mph with the latter speed being in the north-westerly direction. The design decision to use speed cushions helps with any increase in noise, the vehicles do not need to bump the full height of the cushion as they can straddle the cushions and only run on the shoulders. The aim of the features is to help reduce vehicle speeds and encourage people to use active travel for short journeys. Moving people out of vehicles for short journeys helps take vehicles off the roads and helps to offset any minimal increase in emissions from negotiating the cushions.

With respect to Cromlet Drive these build outs have ample visibility from and before the give way line for drivers traveling at appropriate speeds to make the decision as to whether it is safe to proceed. These build outs also act as uncontrolled pedestrian crossings making the area easier for pedestrians to cross the road. Creating build outs in this area will help to protect vehicles if they are dropping off or picking up at the station because all vehicles traveling on the road will be expecting to slow or stop in the area and not be surprised by a stationary vehicle.

20 mph speed limit implementation and the installation of traffic calming to support this where the nature of the road is such it is required to aid compliance with the new limit which ensures the authority are adhering to current design guidance. 20 mph speed limits reduce barriers to active travel encouraging

people out of their vehicles to make active travel choices and vehicles traveling at 20 mph generate less emissions and noise than those traveling at 30 mph.

If you do not feel you have been provided enough information to withdraw your objection the next stage of this formal process is for your objection to be heard by the Elected Members at the Easter Ross Area Committee Meeting, on the 24th of November 2022. Copies of all correspondence pertaining to your objection will be anonymised and contained within the papers that go to this Committee.

We look forward to hearing from you.