

**Blair Watt**

---

**From:** [REDACTED]  
**Sent:** 26 May 2023 10:34  
**To:** Blair Watt  
**Subject:** Re: Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

Dear Blair

Please go ahead and lodge my objections to changing the temporary 20 mph speed limits that were put in place to help with social distancing to be permanent.

The information you sent out in your stock reply only applies to large towns and cities and is not relevant in rural areas.

There has been no real consultation on this in the rural areas.

All these limits should be lifted and put back as before and then if communities feel they need them and the majority of people who live and work in those communities request they should be changed then it should be considered, and this does not mean just the local councillor.

Regards [REDACTED]

Sent from my iPhone

> On 25 May 2023, at 13:19, Blair Watt <BWatt@pkc.gov.uk> wrote:

>

> Dear [REDACTED]

>

> Further to my email below, I would be grateful if you could confirm you wish to withdraw or maintain your objection by 12pm tomorrow?

>

> If you require any further information, please don't hesitate to contact me.

>

> Kind Regards

> Blair Watt | Project Officer

> Road Safety | Traffic and Network | Housing and Environment Perth &

> Kinross Council, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

> Phone: 01738 476944 Mobile: 07827 357105 Email: bwatt@pkc.gov.uk

>

>

>

> -----Original Message-----

> From: Blair Watt

> Sent: Monday, May 22, 2023 12:35 PM

> To: [REDACTED]

> Subject: RE: Perth and Kinross Council (20mph Speed Limit) (Variation)

> (No 16) Order 202X - Perth & Kinross

>

> Dear [REDACTED]

>

> Thank you for your comments regarding Perth and Kinross Council (20mph

> Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

>

> I can confirm that this Traffic Regulation Order has been progressed

> in consultation with Local Elected Members, Community Councils and

> Local Residents. The various locations for the temporary 20mph speed

> limits were installed under the Councils Spaces for People project.

> However, following positive feedback from the various local  
> communities we were asked to make the reduced limits permanent and  
> have since agreed with the respective communities the extents of the  
> speed limits  
>  
> You have raised several points in your objection which I have tried to answer below.  
>  
> Road Safety  
> There is a positive relationship between 20mph speed limits and reducing casualties and collisions on road. 20mph speed limits should reduce the risk of a collision and the severity. The chances of survival if struck at 20mph (90%) are much greater than at 30mph (50%). Slower vehicle speeds help to promote liveable streets and encourage active travel.  
>  
> Air Quality  
> There is little evidence to suggest that reducing vehicle speeds to 20mph increases pollution. Increased driving time does not necessarily result in more air pollution. Driving styles, acceleration and braking are all contributory factors to increased emissions. Research has found that reducing speeds from 30mph to 20mph significantly reduced CO2 and NOx emissions whilst only having a minimum impact on journey times.  
>  
> Journey Times  
> Journey times on roads in urban areas tend to be determined by junctions, crossings and parked vehicles, rather than the speed limit. In many cases lowering the speed limit to 20mph will have little or no impact on journey times. Where there is an impact, this would be negligible, but in turn would make roads safer for more vulnerable road users.  
>  
> Fuel Consumption  
> Fuel consumption is mainly influenced by the way people drive. Driving at a consistent speed is better than stopping and starting. Accelerating up to 30mph can take over twice as much energy as accelerating up to 20mph. A 20mph speed limit and a smooth driving style, can help avoid unnecessary speeding up and slowing down, in turn saving fuel. A study by the Transport Research Board identified that 30km/h zones (18.6mph) resulted in a 12% reduction in fuel consumption.  
>  
> Here are a list of link which you might find useful regarding some of the research mentioned above.  
> <https://content.tfl.gov.uk/speed-emissions-and-health.pdf>  
> <https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf>  
> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757307/20mph-headline-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf)  
> <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#smooth-driving-and-speed-reduction>  
>  
> I hope that the above information demonstrates that making permanent the temporary 20mph speed limits is a positive action for road safety, air quality, journey times as well as improving local communities in several other ways.  
>  
> I would be grateful if you could please confirm whether you wish to withdraw or maintain your objection to the above Traffic Regulation Order? I would be grateful if you could confirm by 12pm on Friday 26th May 2023.  
>  
> If you wish to maintain your objection, we are then required to report your objection to the appropriate Council committee for the Local Elected Members to consider all objections and agree a way forward.  
> If you require any further information, please don't hesitate to contact me.  
>  
> Kind Regards  
> Blair Watt | Project Officer  
> Road Safety | Traffic and Network | Housing and Environment Perth &  
> Kinross Council, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

> Phone: 01738 476944 Mobile: 07827 357105 Email: bwatt@pkc.gov.uk

>

>

>

> -----Original Message-----

> From: CDS Legal Sevices <LegalServices@pkc.gov.uk>

> Sent: 18 May 2023 10:43

> To: Blair Watt <BWatt@pkc.gov.uk>

> Subject: FW: Perth and Kinross Council (20mph Speed Limit) (Variation)

> (No 16) Order 202X - Perth & Kinross

>

>

> Legal Services

> Perth & Kinross Council

> Legal & Governance Services


> 2 High Street

> PERTH

> PH1 5PH

>


> Phone: 01738 475115

>  Help save paper - do you need to print this e-mail?

>

>

> -----Original Message-----

> From: 

> Sent: Wednesday, May 17, 2023 9:04 PM

> To: CDS Legal Sevices <LegalServices@pkc.gov.uk>

> Subject: Perth and Kinross Council (20mph Speed Limit) (Variation) (No

> 16) Order 202X - Perth & Kinross

>

> CAUTION: This email originated from an external organisation. Do not follow guidance, click links, or open attachments unless you have verified the sender and know the content is safe.

>

>

> Dears sirs

> I object to the blanket move to enforce 20 mph zones, that were set up to protect people whilst having to socially distance and not be able to walk on the normal side of the road or to share a pavement .

> Whilst 20 mph zones have their place I would suggest they are used around schools and on housing estates for the shortest possible distances. This is because most people ignore the current 20 zones as they are far too long and I have been over taken on several occasions whilst observing one or more of these zones, even police vans and cars on normal duty have been seen ignoring them!

> In general the public will accept 30 mph or 40 mph zones as being fair, the use of 20 zones holds up the flow of traffic and costs commerce time and money which has to be passed on to the public and thus driving inflation.

> I would like to reiterate my objection to the blanket enforcement of 20 mph zones and hope that the council sees sense when looking into this and that each village, settlement and road is looked at as an individual case.

> Kind regards

> 

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- >

## Blair Watt

---

**From:** [REDACTED]  
**Sent:** 25 May 2023 16:34  
**To:** Blair Watt  
**Subject:** Re: FW: Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

Dear Blair

Thank you for your emails and I apologise for the delay in replying.

As you say in your reply, I raised several points which you have "tried to answer". This is, however, untrue. Having read through your email, I find little that deals directly with the 5 points that I raised. In fact, this appears to be an altogether standard email reply [REDACTED] also emailed, apparently with different points that he raised, and has received an identical email in reply.

Regarding your replies, firstly, I am fully aware of the relationship between decreased speed and casualties, however, as stated in my original email, the policy was applied throughout PKC to all villages and hamlets in response to the need to social distance during the pandemic, in particular since people may have needed to walk on the road when passing another pedestrian from a different household. As previously stated, this is no longer required since we do not have to social distance any longer.

If speed and casualties/collisions are now the primary concern, each individual area should be investigated as to road usage (ie, were these areas with much, if any pedestrian and/or cycle usage), what other provisions are already in place, such as footpaths, and the length of the area restricted for the benefit to each individual area to be properly assessed. In Bridge of Cally, as stated, there is a very safe footpath from the hall right down to the bridge and, whilst currently bicycles cannot use this, it may have been better to look at shared usage if the road was such a concern for cyclists. This would alleviate the need for the 20 mph on the A93 to continue for such a great length. When it was a 30 mph zone, most people were happy to travel at or under 30, whereas now the 20 is being ignored, for the most part. While ignoring a speed limit is definitely not a reason to remove it, having a relevant speed limit would increase compliance.

You have included air quality, which I did not raise as a concern, however you explain that the difference between travelling at 20mph and 30mph does not increase air pollution since there is less acceleration/deceleration at 20. Whilst this may be the case in town, we are not talking about extremely busy areas with lots of stopping and starting. A smooth drive through an area at an appropriate speed up to 30mph, depending on conditions, would not be detrimental to the air quality. The main point of your evidence to support this is that a steady speed, whatever it may be, is more beneficial than SUDDEN increases and decreases.

Again, I did not raise journey times, however most of your reasons, such as junctions, crossings and parked cars are irrelevant for many of the places with the temporary 20mph zones, since there are very few if any of these in the areas concerned. Furthermore, one or two small 20mph zones may not have much of an impact, but add a number of them to a journey and it does have an impact. There are at least 4 between my business in Kirkmichael and Coupar Angus which means that each time I send my van out, a minute or so in each zone can add 15 minutes or more to a return journey. This means that I need to pay my van driver an extra £2 to £3 in wages for every journey which, over a year, will add considerably to the cost of operating a business.

I did not raise fuel consumption as a concern, but it was included in answers to the points that I raised. Having read the various articles you include in your reply, many of these relate to built up areas and one is specifically for TfL and looking at the impact of 20 mph zones as opposed to 30 mph zones in LONDON. This is hardly a relevant comparison. It will always be possible to find a study which proves or disproves a matter, but it needs to be applied to the correct conditions to be meaningful.

I absolutely agree that there are a number of places where a 20 mph restriction is both relevant and a good thing, however I stick by my points that the current, temporary rural restrictions are too slow over too long a distance. As I mentioned, some of Kirkmichael will, certainly, benefit from being 20mph, however not the whole length to the east of the village. You state that this TRO has been progressed in consultation with Local Elected Members, community councils and local residents, however I have not seen anything on the community council minutes, I did speak to councillor Ellis raising my concerns when the restrictions were originally due to be extended, to which his reply was "well many people like them" so I doubt that my voice was heard, or, for that matter anyone else who objected and, although PKC has put notices up regarding the move to make these permanent, there has been nothing on their Facebook page or on local radio or in local shops to alert local residents to this TPO and, when speaking to other locals, most had no idea about this.

Slow down in TOWN is, again, a good policy. There is a much higher likelihood of hazards such as children, pedestrians, etc, in a town, however driving through, for instance, Ballintuim, again, there is never a pedestrian or cyclist in sight. Cycling to work from the A93 to Kirkmichael each day, I do not feel safer due to the 40/20 zone (although better road surfaces would make it much safer, but that is a different question). In town there is also more likely to be stop/start driving meaning acceleration and braking so, again, a lower speed limit reduces the impact of this, however this is not the case in these rural locations. Slowing down from a possible 50-60 to 30 mph would be just as beneficial, if not more so.

I maintain my objections and would be grateful if they are reported, as stated in your email, for proper consideration at the appropriate committee, along with my replies to your points herewith and hope that they will not be presented such that they are given a standardised reply.

Kind regards

On Thu, May 25, 2023 at 1:19 PM Blair Watt <[BWatt@pkc.gov.uk](mailto:BWatt@pkc.gov.uk)> wrote:

Dear [REDACTED]

Further to my email below, I would be grateful if you could confirm if you wish to withdraw or maintain your objection by 12pm tomorrow?

If you require any further information, please don't hesitate to contact me.

Kind Regards

Blair Watt | Project Officer

Road Safety | Traffic and Network | Housing and Environment

Perth & Kinross Council, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

Phone: 01738 476944 Mobile: 07827 357105 Email: [bwatt@pkc.gov.uk](mailto:bwatt@pkc.gov.uk)

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

From: Blair Watt

Sent: Monday, May 22, 2023 12:35 PM

To: [REDACTED]

Subject: RE: Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

Dear [REDACTED]

Thank you for your comments regarding Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

I can confirm that this Traffic Regulation Order has been progressed in consultation with Local Elected Members, Community Councils and Local Residents. The various locations for the temporary 20mph speed limits were installed under the Councils Spaces for People project. However, following positive feedback from the various local

communities we were asked to make the reduced limits permanent and have since agreed with the respective communities the extents of the speed limits

You have raised several points in your objection which I have tried to answer below.

#### Road Safety

There is a positive relationship between 20mph speed limits and reducing casualties and collisions on road. 20mph speed limits should reduce the risk of a collision and the severity. The chances of survival if struck at 20mph (90%) are much greater than at 30mph (50%). Slower vehicle speeds help to promote liveable streets and encourage active travel.

#### Air Quality

There is little evidence to suggest that reducing vehicle speeds to 20mph increases pollution. Increased driving time does not necessarily result in more air pollution. Driving styles, acceleration and braking are all contributory factors to increased emissions. Research has found that reducing speeds from 30mph to 20mph significantly reduced CO<sub>2</sub> and NO<sub>x</sub> emissions whilst only having a minimum impact on journey times.

#### Journey Times

Journey times on roads in urban areas tend to be determined by junctions, crossings and parked vehicles, rather than the speed limit. In many cases lowering the speed limit to 20mph will have little or no impact on journey times. Where there is an impact, this would be negligible, but in turn would make roads safer for more vulnerable road users.

#### Fuel Consumption

Fuel consumption is mainly influenced by the way people drive. Driving at a consistent speed is better than stopping and starting. Accelerating up to 30mph can take over twice as much energy as accelerating up to 20mph. A 20mph speed limit and a smooth driving style, can help avoid unnecessary speeding up and slowing down, in turn saving fuel. A study by the Transport Research Board identified that 30km/h zones (18.6mph) resulted in a 12% reduction in fuel consumption.

Here are a list of link which you might find useful regarding some of the research mentioned above.

<https://content.tfl.gov.uk/speed-emissions-and-health.pdf>

<https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757307/20mph-headline-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf)

<https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#smooth-driving-and-speed-reduction>

I hope that the above information demonstrates that making permanent the temporary 20mph speed limits is a positive action for road safety, air quality, journey times as well as improving local communities in several other ways.

I would be grateful if you could please confirm whether you wish to withdraw or maintain your objection to the above Traffic Regulation Order? I would be grateful if you could confirm by 12pm on Friday 26th May 2023.

If you wish to maintain your objection, we are then required to report your objection to the appropriate Council committee for the Local Elected Members to consider all objections and agree a way forward.

If you require any further information, please don't hesitate to contact me.

Kind Regards

Blair Watt | Project Officer

Road Safety | Traffic and Network | Housing and Environment Perth & Kinross Council, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

Phone: 01738 476944 Mobile: 07827 357105 Email: [bwatt@pkc.gov.uk](mailto:bwatt@pkc.gov.uk)

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

From: CDS Legal Sevices <[LegalServices@pkc.gov.uk](mailto:LegalServices@pkc.gov.uk)>

Sent: 18 May 2023 10:42

To: Blair Watt <[BWatt@pkc.gov.uk](mailto:BWatt@pkc.gov.uk)>

Subject: FW: Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

Legal Services  
Perth & Kinross Council  
Legal & Governance Services  
2 High Street  
PERTH  
PH1 5PH

Phone: 01738 475115

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

From: [REDACTED]

Sent: Wednesday, May 17, 2023 8:15 PM

To: CDS Legal Sevices <[LegalServices@pkc.gov.uk](mailto:LegalServices@pkc.gov.uk)>

Subject: Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

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Dear Sir

I would like to object to the above temporary order being made permanent for the reasons stated below:

1. The intention of the temporary order was to enhance the safety of pedestrians and cyclists, in particular having to give more space to one another during the Covid pandemic. This is no longer required.
2. The 20mph limits were brought in as a blanket restriction across all villages and hamlets throughout PKC without giving adequate consideration to each individual area's requirements, both from the point of view of geography and road usage (ie do people actually use the roads in the way anticipated, or are the restricted areas/roads over too long a distance?).
3. The 20mph restrictions cover too long an area in most cases and are often in areas with very few or no pedestrians or cyclists.
4. With the length of the restricted areas being so long, and often devoid of pedestrians or cyclists, motorists regularly ignore the 20 mph restriction and harass or overtake anyone abiding to the restriction, whereas at 30mph motorists respect the speed limits much better.
5. Motorists' attention is diminished when driving through an empty road in the middle of the countryside at a much slower speed.

[REDACTED] I believe that the 20 mph in Bridge of Cally would serve the area much better if it was limited to the area on the A93 around the hotel and village shop where there is no footpath and there are likely to be pedestrians, as well as going west on the A924 it should take in the caravan site. The rest of the village should revert to 30mph as it was prior to the pandemic. The area from the hall to the shop is well-served by a footpath.



In Kirkmichael, again, the area in the centre of the village would benefit from being 20mph as there are often parked cars, children and animals around, however, this could start by the bend before the church on the A924 to the east of the village, and finish at the end of the houses to the west. The remaining area currently at 20 mph should revert to 30mph and the 40mph areas returned to the national speed limit of 60 mph.

Another road we regularly use is the A827 to the north of Loch Tay. Again, there is an incredibly long section at 20 mph around Fearnan and the turning to Glen Lyon/Fortingall that has no justification to be a 20 mph. We have never seen a pedestrian or cyclist on the entire stretch and it would perfectly adequately be served by a 40 mph limit.

I would like to add that I am a motorist with many years' experience and have never had any points on my licence. I consider myself to be a careful and considerate driver so am not objecting for the sake of speeding around the countryside. I am also a cyclist and regularly cycle to work, as well as around the area generally, and I do not consider that keeping the 20 mph areas as they currently stand would enhance my enjoyment or safety in these areas.

Please do not proceed with the blanket adoption of the traffic order.

Kind regards

A large black rectangular redaction box covering the signature of the sender.

Sent from my iPad

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## Blair Watt

---

**From:** Blair Watt  
**Sent:** 22 May 2023 12:35  
**To:** [REDACTED]  
**Subject:** RE: 20pmh zone objection

Dear [REDACTED]

Thank you for your comments regarding Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

I can confirm that this Traffic Regulation Order has been progressed in consultation with Local Elected Members, Community Councils and Local Residents. The various locations for the temporary 20mph speed limits were installed under the Councils Spaces for People project. However, following positive feedback from the various local communities we were asked to make the reduced limits permanent and have since agreed with the respective communities the extents of the speed limits

You have raised several points in your objection which I have tried to answer below.

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Here are a list of link which you might find useful regarding some of the research mentioned above.

<https://content.tfl.gov.uk/speed-emissions-and-health.pdf>

<https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757307/20mph-headline-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf)

<https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#smooth-driving-and-speed-reduction>

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If you wish to maintain your objection, we are then required to report your objection to the appropriate Council committee for the Local Elected Members to consider all objections and agree a way forward.

If you require any further information, please don't hesitate to contact me.

Kind Regards

Blair Watt | Project Officer

Road Safety | Traffic and Network | Housing and Environment Perth & Kinross Council, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

Phone: 01738 476944 Mobile: 07827 357105 Email: bwatt@pkc.gov.uk

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

From: CDS Legal Sevices <LegalServices@pkc.gov.uk>

Sent: 18 May 2023 10:41

To: Blair Watt <BWatt@pkc.gov.uk>

Subject: FW: 20pmh zone objection

Legal Services

Perth & Kinross Council

Legal & Governance Services

2 High Street

PERTH

PH1 5PH

Phone: 01738 475115

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

From: 

Sent: Wednesday, May 17, 2023 11:03 PM

To: CDS Legal Sevices <LegalServices@pkc.gov.uk>

Subject: 20pmh zone objection

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To whom it may concern,

Given that Perth and Kinross is largely a rural county its residents have large distances to travel. Putting 20pmh zones on all of these rural settlements results in a more timely journey and can congest the local towns rather than allow the free flow of traffic.

The congestion in itself along with speeding up and slowing down is an inefficient way to run a vehicle adding to our carbon footprint rather than reducing.

An additional issue it causes is due to the distance taking into account the 40mph then 20 mph reduction it removes a number of safe overtaking stretches, given that in such rural areas being behind a tractor or slow moving vehicle is common it causes a lack of safe overtaking and again causes queuing traffic and congestion.

A blanket approach does not take into consideration the needs of your residents and it should be looked at very selectively to where these speed limits will actually have a positive impact.

I trust you will take these points into genuine consideration.

Kind regards

[Redacted signature]

[Redacted contact information]

Sent from my iPhone

## Blair Watt

---

**From:** [REDACTED]  
**Sent:** 23 May 2023 10:19  
**To:** Blair Watt  
**Subject:** Re: Formal Objection to : 20mph speed limit Variation No16 Order 202X

Good Morning

Thanks for your response however I am not certain that you have actually understood that my objection is NOT simply an 'anti speed limit' one; it is to the geographic extent of the '20mph zones' into areas where your road safety argument is weak when compared to the climate emergency facts we all have to face.

Let me address some of the issues you raise and give my viewpoint / additional information:

1. the 20mph speed limit locations are pretty arbitrary - they make the assumption that the centre of communities need to be 20mph but for some reason housing estates don't - and were generated during the height of the covid emergency WITHOUT any consultation and to allow people to walk on the road in safety to keep 2m apart from one another. Clearly that requirement is no longer valid; I believe that each 20mph is an individual case and should therefore now be properly and objectively reviewed before being made permanent.

2. Of course 'locals' say 'we want a 20mph limit' - its a form of reverse 'nimbyism' which is perfectly understandable. However planning authorities are there to make judgements on 'the greater good' and in this instance need to weigh cost v benefit [ pollution v safety] in an objective manner

3. Your statements to support 20mph limits:

a. Road safety benefit of slower traffic : 100% accept

b. air quality / fuel consumption are linked so i will deal with them together:

all of the studies you refer to have been carried out in urban environments and are not relevant to my objection - i am saying 'let traffic flow where it can and where it is safe to do so AND thus get the benefit of lower pollution' ; in Perthshire we enjoy light traffic and little congestion. Most times of the day in most

locations

it is possible to drive at the speed limit [ 20 / 30 / 40 / 60 ] without being held up.

When this is the case a direct mechanical engineering analysis of pollution / fuel consumption is the most relevant

approach ie what is the output of a vehicle over a given distance when driven at a constant speed in the highest possible gearbox gear [ to give lowest engine revolutions].

Here is such an analysis carried out on my bmw 2.0 diesel, manual gearbox car covering 1 mile :

At 30mph : engine in 5th gear = 1280rpm [ revolutions per minute] . Time taken 2 minutes - total engine revolutions : 2560

At 20mph: engine in 2nd gear = 1600rpm Time taken 3 minutes - total engine revolutions : 4800

[ nb cannot use 3rd gear at 20mph as resulting rpm too low for engine to run]

Comparison: each engine revolution produces the same emissions [ assumption - driving at steady speed] therefore

exhaust emission increase / decrease is directly related to number of revolutions of engine over a given distance.

**In this case by driving for 1 mile at 20mph rather than 30 mph WILL cause tailpipe emissions to increase by 87.5%**

**[ 4800 divided by 2560]. Other vehicles may be slightly better others may be worse [ depending on their available gearbox ratios and minimum engine running speed] but EVERY internal combustion engine vehicle will produce more pollution at 20mph [compared to 30mph] in the above scenario**

I can provide photographic proof of this if you wish - or take you for a drive in the car in question to demonstrate the above

nb my 'miles per gallon' are also significantly worse - 38mpg instead of 55mpg - so there is also a personal economic cost

And this is the basis of my objection - IF we force 20mph where it is normally possible to drive at 30mph we WILL increase exhaust pipe pollution .

You then go on to summarise your position by saying "I hope that the above information demonstrates that making permanent the temporary 20mph speed limits is a positive action for road safety, air quality, journey times as well as improving local communities in several other ways. " - no it does not demonstrate positive action for air quality so yes you should consider my objection to be valid and worthy of consideration

### Summary

The 20mph limits NEED properly assessing along the entire length of each of them - is there normally traffic congestion or is traffic free flowing? is there significant pedestrian risk ? is the road wide or narrow? how good is pedestrian and driver vision?

**- not just 'rubber stamping' as permanent without considering the cost to the environment indeed the planet of doing so**

**It is inappropriate to propose to deal with all of the 20mph zones 'en mass' without prior individual review**

Yours

On Mon, 22 May 2023 at 14:49, Blair Watt <[BWatt@pkc.gov.uk](mailto:BWatt@pkc.gov.uk)> wrote:

Dear [REDACTED]

Thank you for your comments regarding Perth and Kinross Council (20mph Speed Limit) (Variation) (No 16) Order 202X - Perth & Kinross

I can confirm that this Traffic Regulation Order has been progressed in consultation with Local Elected Members, Community Councils and Local Residents. The various locations for the temporary 20mph speed limits were installed under the Councils Spaces for People project. However, following positive feedback from the various local communities we were asked to make the reduced limits permanent and have since agreed with the respective communities the extents of the speed limits

You have raised several points in your objection which I have tried to answer below.

### Road Safety

There is a positive relationship between 20mph speed limits and reducing casualties and collisions on road. 20mph speed limits should reduce the risk of a collision and the severity. The chances of survival if struck at 20mph (90%)

are much greater than at 30mph (50%). Slower vehicle speeds help to promote liveable streets and encourage active travel.

### Air Quality

There is little evidence to suggest that reducing vehicle speeds to 20mph increases pollution. Increased driving time does not necessarily result in more air pollution. Driving styles, acceleration and braking are all contributory factors to increased emissions. Research has found that reducing speeds from 30mph to 20mph significantly reduced CO<sub>2</sub> and NO<sub>x</sub> emissions whilst only having a minimum impact on journey times.

### Journey Times

Journey times on roads in urban areas tend to be determined by junctions, crossings and parked vehicles, rather than the speed limit. In many cases lowering the speed limit to 20mph will have little or no impact on journey times. Where there is an impact, this would be negligible, but in turn would make roads safer for more vulnerable road users.

### Fuel Consumption

Fuel consumption is mainly influenced by the way people drive. Driving at a consistent speed is better than stopping and starting. Accelerating up to 30mph can take over twice as much energy as accelerating up to 20mph. A 20mph speed limit and a smooth driving style, can help avoid unnecessary speeding up and slowing down, in turn saving fuel. A study by the Transport Research Board identified that 30km/h zones (18.6mph) resulted in a 12% reduction in fuel consumption.

Here are a list of link which you might find useful regarding some of the research mentioned above.

<https://content.tfl.gov.uk/speed-emissions-and-health.pdf>

<https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757307/20mph-headline-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf)

<https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#smooth-driving-and-speed-reduction>

I hope that the above information demonstrates that making permanent the temporary 20mph speed limits is a positive action for road safety, air quality, journey times as well as improving local communities in several other ways.

I would be grateful if you could please confirm whether you wish to withdraw or maintain your objection to the above Traffic Regulation Order? I would be grateful if you could confirm by 12pm on Friday 26th May 2023.

If you wish to maintain your objection, we are then required to report your objection to the appropriate Council committee for the Local Elected Members to consider all objections and agree a way forward.

If you require any further information, please don't hesitate to contact me.

Kind Regards

Blair Watt | Project Officer

Road Safety | Traffic and Network | Housing and Environment

Perth & Kinross Council, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

Phone: 01738 476944 Mobile: 07827 357105 Email: [bwatt@pkc.gov.uk](mailto:bwatt@pkc.gov.uk)



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**From:** CDS Legal Sevices <[LegalServices@pkc.gov.uk](mailto:LegalServices@pkc.gov.uk)>

**Sent:** 22 May 2023 10:17

**To:** Blair Watt <[BWatt@pkc.gov.uk](mailto:BWatt@pkc.gov.uk)>

**Subject:** FW: Formal Objection to : 20mph speed limit Variation No16 Order 202X



Perth & Kinross Council

Legal & Governance Services

2 High Street

PERTH

PH1 5PH

Phone: 01738 475115

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**From:** [REDACTED]  
**Sent:** Thursday, May 18, 2023 9:00 PM  
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**Subject:** Formal Objection to : 20mph speed limit Variation No16 Order 202X

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Please receive the attached document as my formal objection to the above order

Best Regards

[REDACTED]  
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