

Transport and Environment Committee

10:00am, Tuesday, 17 January 2017

Objections to Traffic Regulation Order TRO/16/74 20mph Speed Limit – Various Roads, Edinburgh

Item number	8 . 4
Report number	
Executive/Routine	Routine
Wards	All Wards

Executive Summary

This report details objections to Traffic Regulation Order TRO/16/74 which will make variations to the previously implemented Traffic Regulation Order TRO/15/17 for a citywide 20mph network. It informs Committee of the two objections received to the Order and seeks approval to set these aside and make the Order as advertised.

Links

Coalition Pledges	P46
Council Priorities	CP4
Single Outcome Agreement	SO1 , SO2 , SO3 , SO4

Objections to Traffic Regulation Order TRO/16/74 20mph Speed Limit - Various Roads, Edinburgh

1. Recommendations

- 1.1 It is recommended that the Committee:
- 1.1.1 notes the objections received to the above Traffic Regulation Order; and
 - 1.1.2 sets aside the objections and gives approval to make the Traffic Regulation Order as advertised.

2. Background

- 2.1 On 17 March 2015, the Transport and Environment Committee approved an implementation plan for the roll-out of the citywide 20mph network previously approved on 13 January 2015, following consultation. Committee also authorised commencement of the statutory procedures (Traffic Regulation Order) required to introduce a 20mph speed limit for the approved road network.
- 2.2 Advertised in May 2015, the Order received 86 representations, of which 54 were considered objections and were reported to Committee on 12 January 2016. Committee agreed to set these aside and make the Order (TRO/15/17) for a citywide 20mph speed limit. This covers all of the city centre, most shopping streets, and residential areas. Phased implementation of the relevant signage is planned between June 2016 and February 2018.
- 2.3 It became apparent during the subsequent detailed design process for Construction Phase 1 (Zone 1 - City Centre and Rural West Edinburgh) that the Order omitted several streets from the proposed 20mph speed limit network, for a variety of reasons. The omissions largely resulted from errors in the original scoping exercise, amendments required to incorporate a small number of additional streets or parts of streets, and the inclusion of new streets. Some other amendments were also necessary. To rectify the situation and provide the formal basis for the introduction of the 20mph speed limit on these streets, variations to the Order were required. Committee approved a variation to the Order on 30 August 2016 (TRO/16/09A-D) but it was also reported that a requirement for further variations was likely as detailed designs were progressed for future construction phases.

- 2.4 Construction Phase 2 (Zones 2 and 3 - North and South Central/East Edinburgh) commenced in November 2016, with the associated Traffic Regulation Order introducing the 20mph speed limit in these areas on 28 February 2017.

3. Main report

- 3.1 Detailed design for Construction Phase 2 (Zones 2 and 3 - North and South Central/East Edinburgh) identified further variations required to the Order. Whilst a small number of these are omissions from the original scope, the majority result from the creation of new streets in recent developments or detailed amendments to sections of existing streets to improve the design.

Omitted Streets

- 3.2 Given the extremely large number of streets within the Order, some were overlooked in error during its preparation. Consequently, there is no legal basis to introduce 20mph speed limits on them. In addition, several streets in new developments are now included within the 20mph network. At this stage, new streets have been identified for inclusion in Zones 2, 3 and 6.
- 3.3 A limited number of streets have also been included to ensure continuity with existing 20mph zones.
- 3.4 While all omissions identified to date are included in the proposed Variation Order, a further Order may be required during the detailed design of the later phases. This would cover future changes to the road network and any further streets subsequently identified as omitted from TRO/15/17, or reflect design development.

Further Variations to TRO/15/17

- 3.5 There are a small number of streets, or sections of streets, which require removal from the Order. Generally, this is where the full street is limited to 20mph in the Order, when the limit should only apply to a section. In two instances (Waterfront Avenue and Broadway) it is deemed inappropriate to introduce a 20mph limit at this stage due to the existing design characteristics of the streets. Further explanation is provided in Appendix 2.
- 3.6 A number of streets were listed in the incorrect Area within the Order. This is resolved by moving the streets to the correct Area List.
- 3.7 Appendix 1 records the streets covered by the variation to the Order.

Procedure

- 3.8 TRO/16/74 was advertised in November 2016. In accordance with the relevant legislation, on-street notices were erected, advertisements published in the local press and copies of all relevant documents made available for viewing at the City Chambers.
- 3.9 As well as these legislative requirements, electronic copies of all relevant documents were published on the Council's website and on the Scottish Government's public information gateway, www.tellmesotland.gov.uk.

- 3.10 By the end of the formal consultation period, the Council had received a total of two responses. Respondents were provided with a reply and given the opportunity to withdraw their objection. The two objections were not withdrawn.
- 3.11 One comment contained an objection to the introduction of any further 20mph speed limits, support for the removal of the 20mph speed limit on the streets listed, and noted that any delay in implementation by change of area is welcome.
- 3.12 The other comment formed an objection to the removal of any 20mph limits.
- 3.13 Details of the objections and a response are provided in Appendix 2.
- 3.14 The objection to the introduction of additional 20mph streets is identical to one submitted in response to TRO/15/17 which introduced the citywide order. It forms an objection to the principle of the scheme rather than an issue with one or more of the streets in the schedule. As the principle of the introduction of the scheme has been previously established by Committee, it is recommended this be set aside.
- 3.15 The objection to the removal of streets from the 20mph schedule is based on a view that as many streets as possible should be set at 20mph. Appendix 2 provides the reasoning for the removal of these streets. Whilst it is recommended that the objection be set aside, should Committee be minded to retain the 20mph limit on any of these streets, the speed limit signage can be installed in due course without need for further statutory process.

4. Measures of success

- 4.1 A monitoring structure is in place to measure, over time, traffic speed and volume, public perceptions, accident data and walking/cycling volume.
- 4.2 The intended impacts and therefore measures of success for the project include:
 - 4.2.1 reduction in speeds;
 - 4.2.2 reduction in the number and severity of road casualties on relevant streets;
 - 4.2.3 increase in walking and cycling; and
 - 4.2.4 changes to peoples' perceptions of 'liveability' and 'people-friendliness' of Edinburgh's streets.

5. Financial impact

- 5.1 The costs incurred with undertaking the statutory procedures described in this report are approximately £3,000. These are fully contained within the Transport managed Capital Investment Programme.
- 5.2 The total implementation cost of the project is estimated at approximately £2.2 million spread over three consecutive financial years. However, it is anticipated that most of the project funding will be obtained through successful external bids or ring-fenced funding allocated to the Council by the Scottish Government for projects aimed at improving safety and encouraging active travel.

6. Risk, policy, compliance and governance impact

- 6.1 Project delivery within the stated timetable depends on the success of funding bids from external sources.

7. Equalities impact

- 7.1 An Equalities and Rights Impact Assessment (ERIA) has been carried out and is ongoing throughout the implementation process to ensure that there are no infringements of rights or impacts on duties under the Act. No negative impacts are anticipated and it is expected that the scheme should improve conditions for vulnerable road users.

8. Sustainability impact

- 8.1 The impacts of this report in relation to the three elements of the Climate Change (Scotland) Act 2009 Public Bodies Duties have been considered.
- 8.2 There is no conclusive evidence to suggest that the proposals to reduce the speed limit will have a positive or negative impact on carbon emissions.
- 8.3 It is, however, expected that environmental and air quality benefits will be realised if safer road conditions result in increased levels of walking and cycling.
- 8.4 Relevant Council sustainable development policies have been taken into account.

9. Consultation and engagement

- 9.1 These proposals have been advertised in the press and through on-street public notices, in accordance with the relevant legislation.
- 9.2 Statutory bodies representing those the proposals could affect, including Community Councils, the emergency services, and local ward Councillors have received advisory letters. Details were also published on the Council and Scottish Government websites.

10. Background reading/external references

- 10.1 [Objections to Traffic Regulation Order TRO/15/17 20mph Speed Limit](#) – Various Roads, Edinburgh - Report to the Transport and Environment Committee by the Acting Director of Services for Communities, 12 January 2016.
- 10.2 [Objections to Traffic Regulation Order TRO/16/09A-D - Various Roads, Edinburgh](#) - Report to the Transport and Environment Committee by the Executive Director of Place, 30 August 2016.
- 10.3 [20 for Edinburgh, 20mph Network Implementation](#) – Report to the Transport and Environment Committee by the Acting Director of Services for Communities, 17 March 2015.
- 10.4 [Delivering the LTS 2014-2019, 20mph Speed Limit Rollout](#) - Report to the Transport and Environment Committee by Director of Services for Communities, 13 January 2015.
- 10.5 [Transport 2030 Vision](#), The City of Edinburgh Council.
- 10.6 [The Local Transport Strategy 2014-19](#), The City of Edinburgh Council.

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11. Links

Coalition Pledges	P46 – Consult with a view to extending current 20mph zones
Council Priorities	CP4 – Safe empowered communities
Single Outcome Agreement	SO1 – Edinburgh’s Economy Delivers increased investment, jobs and opportunities for all. SO2 – Edinburgh’s citizens experience improved health and wellbeing, with reduced inequalities in health. SO3 – Edinburgh’s children and young people enjoy their childhood and fulfil their potential. SO4 – Edinburgh’s communities are safer and have improved physical and social fabric.
Appendices	Appendix 1: List of Streets included in TRO/16/74 Appendix 2: Comments received to TRO/16/74 and associated responses

THE CITY OF EDINBURGH COUNCIL (VARIOUS ROADS, EDINBURGH) (20 MPH SPEED LIMIT) (VARIATION NO _) ORDER 201_ - TRO/16/74

THE COUNCIL PROPOSES TO MAKE AN ORDER UNDER THE ROAD TRAFFIC REGULATION ACT 1984, AS AMENDED, TO:-

INTRODUCE A 20 MPH SPEED LIMIT TO THE FOLLOWING ROADS: **AREA 1** – CLUFFLAT & QUEENSFERRY RD – KIRKLISTON (50M NORTH OF EILSTON RD TO 100M NORTH OF EILSTON RD). **AREA 2** - ARNEIL DR, ARNEIL PL, ASHVILLE TER, BEECHWOOD TER, CITYPARK WAY, CRAIGHALL RD (CUL-DE-SAC AT NOS.21 TO 27), CUSTOM HOUSE PL, E FETTES AVE (INVERLEITH PL NORTHWARD TO A POINT 120M SOUTH FROM FERRY RD), ELMWOOD TER, DARVEL GAIT, GRETNA MEWS, GUMLEY PL, HESPERUS BROADWAY, KIMMERGHAME ROW, KING ST, KIRKGATE - BLINKBONNY (BETWEEN JUNC OF LANARK RD W AND BLINKBONNY RD), LATTA PL, LONDON RD (ELM ROW EASTWARD TO A POINT 40M EAST OF WINDSOR ST), MONMOUTH TER, OAKVILLE TER, QUINTINSHILL PL, SAILMAKER RD, PILLANS PL, PILTON AVE LANE, TAYLOR GDNS, UPPER HERMITAGE, W HARBOUR RD (CUSTOM HOUSE PL TO GRANTON SQ) & WOODVILLE TER. **AREA 3** - ANDREW BALFOUR GR, APPIN PL, BAULD DR, BENHAR RD, E COURT (GREENDYKES), FERGUSON RIGG, FLOCKHART GAIT, FURCHEONS PK, HEWING PL, HOPPER GDNS, MATTHEW ST, METHVIN WLK, MYRTLE TER, OSTLER LOAN, POLWARTH GR, PRIMROSE TER, TUDSBERY AVE & WOOLMET PL. **AREA 6** - ADIT PL, CLIPPENS DR, DUNNET GR, DURIE LOAN, FALA PL, FELLS WAY, GARVALD ST, HIBBERT ST, LIME KILNS VIEW, LINDEN AVE, MARTIN ST, PHILIP TER, SHALE RD & SOUTRA RD;

REMOVE THE 20MPH SPEED LIMIT ON THE FOLLOWING ROADS: **AREA 2** - WATERFRONT AVE & WATERFRONT BROADWAY. **AREA 3** - BALGREEN RD (PARALLEL SECTION AT NOS. 154-170), POLWARTH TER (GILLSLAND RD TO COLINTON RD), ROSEBURN ST (60 M NORTHWARD FROM WESTFIELD RD) & WHITSON RD (BALGREEN RD, TO POSTS AT 40M WEST OF BALGREEN RD). **AREA 5** - GORDON TER RD. **AREA 6** - BONALY RD (SOUTHWARD FROM TORDUFF RD) & SWANSTON RD (SOUTHWARD FROM A POINT 95M SOUTH OF SOUTHERN END OF CITY BYPASS BRIDGE); AND

CHANGE THE DATE THAT THE 20MPH SPEED LIMIT WILL BE IMPLEMENTED ON THE FOLLOWING ROADS: AREA 2 FROM AREA 5 - IMPLEMENTATION DATE CHANGED FROM 31/7/17 TO 28/2/17, HERMISTON & HERMISTON STEADING, AREA 3 FROM AREA 6 - IMPLEMENTATION DATE CHANGED FROM 31/1/18 TO 28/2/17, CRAIGLOCKHART LOAN (CRAIGLOCKHART AVE TO CRAIGLOCKHART DR NTH), AREA 4 FROM AREA 3 – IMPLEMENTATION DATE CHANGED FROM 28/2/17 TO 31/7/17, BELFORD RD (BELL'S MILLS TO RAVELSTON TER).

DETAILS OF THE DRAFT ORDER & RELATED DOCS CAN BE VIEWED 9.30AM - 3.30PM MON-FRI FROM 14/11/16 TO 5/12/16 AT CITY CHAMBERS RECEPTION OR ONLINE AT

WWW.EDINBURGH.GOV.UK/TRAFFICORDERS OR WWW.TELLMESCOTLAND.GOV.UK.

OBJECTORS MUST STATE THEIR REASONS IN WRITING, WITH REF TRO/16/74, TO TRAFFIC ORDERS, PLACE, CITY CHAMBERS, HIGH ST, EDINBURGH, EH1 1YJ NOT LATER THAN 5/12/16.

Analysis of Comments from TRO/16/74

Total number of responses - 2

2 Responses from individuals		

Representations

Respondents made multiple points. These are separated in the tables below. The number of times a comment was raised is shown in column three.

Objections to the addition of streets to the 20mph schedule

One respondent objected to the addition of streets to the 20mph schedule. The objector reiterated objections lodged against TRO15/17

The table below identifies the specific objections and provides a response.

Issue	Response	Number of comments
20mph proposals will increase congestion and pollution	Principle of introducing the scheme established by Committee. Studies have so far not conclusively proven either a positive or negative effect on emissions: driving at 20 mph causes some emissions to rise slightly and some to fall. Research indicates that at slower speeds, vehicles flow more smoothly through junctions. As such, within an urban environment, 20mph may help to improve traffic flow. In addition, as a result of reduced acceleration and braking, 20mph may help to reduce fuel consumption and associated emissions. Some environmental benefit from the change is expected from helping to unlock the potential for walking or cycling short distances instead of driving.	1
Increased danger around schools when part time signage is removed. More likelihood of lack of compliance.	Principle of introducing the scheme established by Committee. Part time signage will be removed where incorporated in full time 20mph area. New signs in accordance with Traffic Signs Regulations & General Directions (TSRGD) 2016 will be erected. Wider 20mph zones should lead to safer journeys over longer distances to school. Police Scotland will continue to prioritise school zones for speed checks	1

APPENDIX 2

<p>Costs of 20mph programme and direct/indirect costs to users</p>	<p>Principle of introducing the scheme established by Committee.</p> <p>The overall cost for the project has been budgeted at £2.2 million. However, it is anticipated that the majority of the funding for the project will either be obtained as a result of successful bids for external funding or will be ring-fenced funding allocated to the Council by the Scottish Government for projects aimed at improving safety and encouraging active travel.</p> <p>The Council worked closely with Lothian Buses to avoid significant impact to bus timetables. The scheme is supported by external partners such as Police Scotland and NHS Lothian.</p> <p>Regarding journey times, research in other cities, surveys of current speeds, and results of the pilot project in South Edinburgh, suggest that journey times will not significantly increase. This reflects existing traffic speeds in 30mph zones often being significantly below the speed limit and the proportion of time which is spent stationary in traffic. In addition, by easing traffic flow during busy periods 20mph may actually reduce some journey times. Changes not exceeding 25 seconds per mile can be expected and this figure might be significantly lower (around 10 seconds per mile has been found in central parts of Bristol, where a 20mph limit has been introduced).</p>	<p>1</p>
<p>Concerns that 20mph will not be enforced, bringing speed limits into disrepute</p>	<p>Principle of introducing the scheme established by Committee</p> <p>Police Scotland is supportive of improved road safety and is working with the Council to achieve this. Police Scotland recognises speed management is an important element of this and will continue to enforce speed limits across the city road network.</p>	<p>1</p>
<p>Proposals contravene Scottish Government Good Practice Guidance. Guidance on 20mph zones states that the limit is unlikely to be complied with on roads where the vehicle speeds are substantially in excess of 20mph.</p>	<p>Principle of introducing the scheme established by Committee</p> <p>We have sought to comply with Scottish Government Good Practice Guidance, recently updated (June 2016) Para 60 advises:</p> <p>The City of Edinburgh Council pilot showed that locations with an initial mean speed higher than 24 mph generally experienced the highest drops in speeds. It can therefore be appropriate to impose 20 mph limits on some streets with a mean speed of higher than 24 mph, in a context of other nearby streets with lower existing averages. This can have the benefit of avoiding a piecemeal speed network in a predominantly 20 mph limit area.</p>	<p>1</p>

APPENDIX 2

Objections to Specific Streets being removed from the 20mph schedule

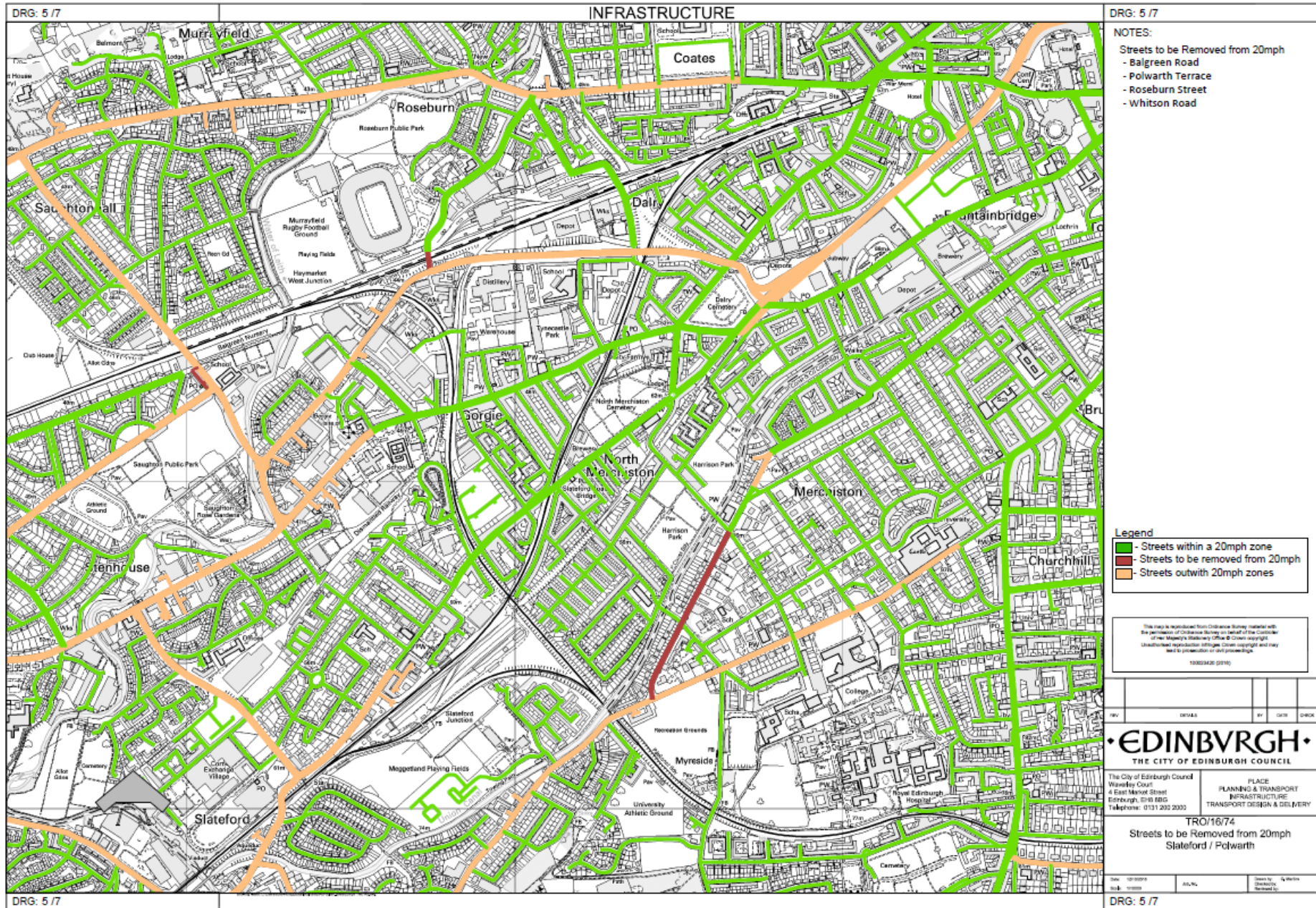
One respondent objected to the removal of streets from the 20mph schedule (Plans shown below). The objector considered that removing streets is a retrograde step and could see no particular justification for not applying the 20mph limit to these streets as it was considered that they mainly connect to 20mph streets, it would increase the volume of signage, and most were short, narrow and frequently used by cyclists.

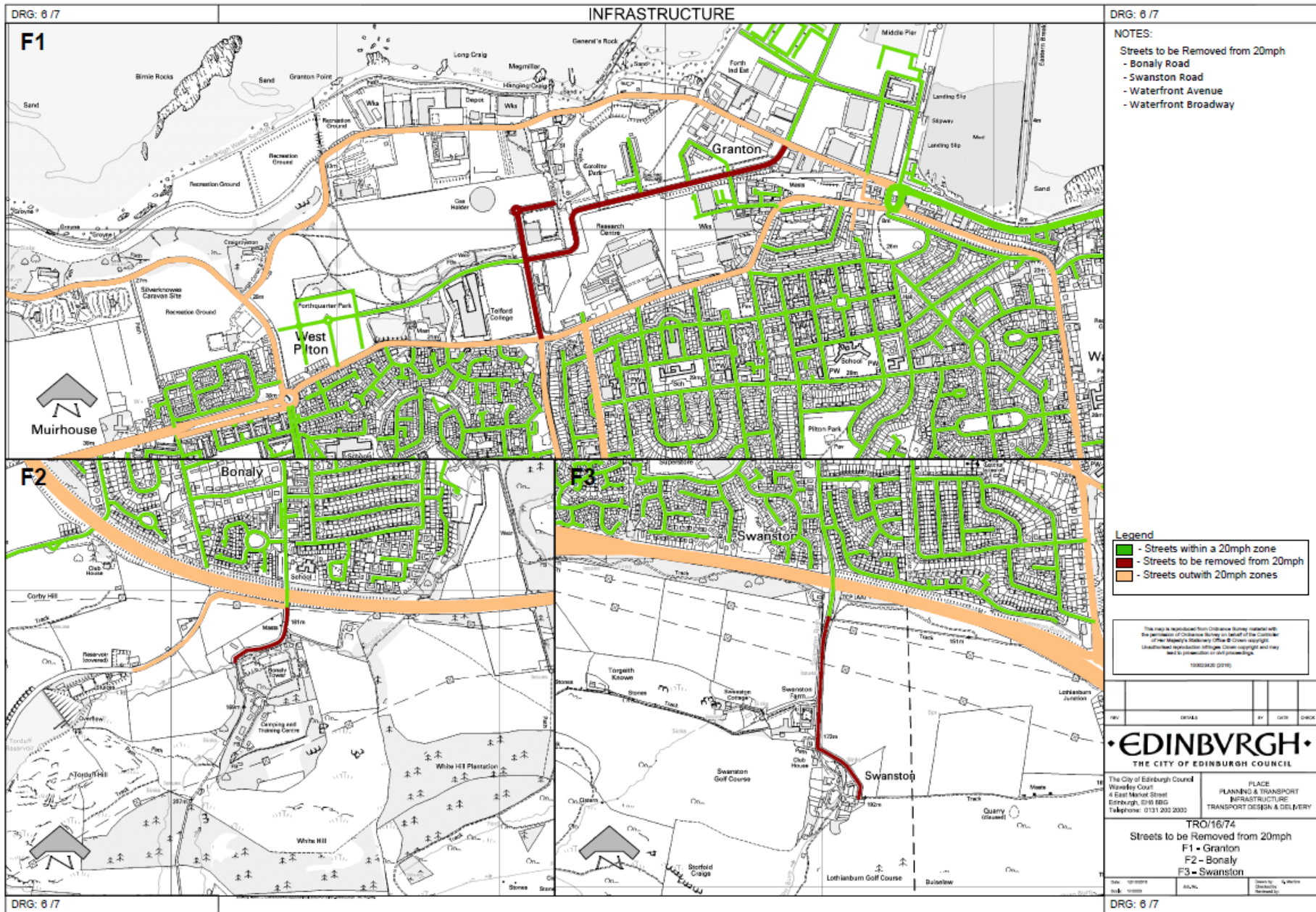
The table below identifies the specific streets and provides the reasoning for their removal.

Street	Comments	Number of Comments
Waterfront Avenue and Broadway	Whilst Waterfront Avenue and Broadway were in the original scope of the 20mph network, on commencing the detailed design it was determined they were less appropriate for inclusion in a signage based 20mph zone due to the carriageway design which forms a largely straight wide boulevard, the provision of separated pedestrian and cycle facilities and the limited residential frontage access. The side streets off Waterfront Avenue will be limited to 20mph. In addition, retention of the 30mph limit on these streets continues to provide an alternative to West Granton Road. Appropriate speed limits will remain under review, and should the nature of the street change over time, the potential for the future introduction of a 20mph limit remains.	1
Balgreen Rd (Parallel section at Nos 154-170)/Whitson Rd (Balgreen Rd to posts 40m west of Balgreen Rd)	These connected sections form a short set-back off Balgreen Road, where traffic speeds are effectively controlled by the factors of distance, hard bends and road width. The main carriageway of Balgreen Rd remains at 30mph, whilst the main carriageway of Whitson Rd, which is to be 20mph, is separated by bollards from the section in question. There is no vehicular access from Whitson Rd. Removing this section from the TRO will have no impact on speeds, but will prevent the need to erect unnecessary signage and assist in controlling street “clutter” when it can be avoided.	1
Roseburn St (60m northward from Westfield Rd)	This adjustment is to ensure the 20mph entrance signage is in the most effective location for traffic turning from Westfield Rd, which remains at 30mph.	1
Polwarth Terrace (Gillsland Rd to Colinton Rd)	This amendment is to remove an inconsistency between the originally advertised network and TRO/15/17. The 20mph section will commence eastwards of Harrison Rd/Gillsland Rd. Polwarth Grove to the immediate north east is contained within the list of streets to be added to the 20mph network within TRO/16/74	1

APPENDIX 2

Gordon Terrace Rd	This removal is to correct a typographical error in TRO/15/17as this street does not exist	1
Bonaly Rd (Southward from Torduff Rd)	This section of road was omitted from the 20mph network approved by Transport and Environment Committee on 13 January 2015. However, the section definition was omitted from TRO/15/17. Its inclusion in TRO/16/74 is to correct this omission. The 20/30mph transition zone will be positioned at the point where there is access to a separated path so that pedestrians, cyclists and others can avoid the carriageway.	1
Swanston Rd (Southward from a point 95m south of the southern end of the City Bypass Bridge)	This section of road was omitted from the 20mph network approved by Transport and Environment Committee on 13 January 2015. However, the section definition was omitted from TRO/15/17. Its inclusion in TRO/16/74 is to correct this omission. The nature of the road is such that speeding is unlikely to be an issue	1





DRG: 6/7

NOTES:

- Streets to be Removed from 20mph
- Bonaly Road
- Swanston Road
- Waterfront Avenue
- Waterfront Broadway

Legend

- Streets within a 20mph zone
- Streets to be removed from 20mph
- Streets outwith 20mph zones

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PLACE
PLANNING & TRANSPORT
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TRO/16/74
Streets to be Removed from 20mph
F1 - Granton
F2 - Bonaly
F3 - Swanston

DRG: 6/7