

Transport and Environment Committee

10.00am, Thursday, 28 January 2021

Objections to TRO/20/07 – Proposed Extension of 20mph Speed Limit

Executive/routine	Executive
Wards	1, 4, 6, 10, 15
Council Commitments	16,17,18,19

1. Recommendations

- 1.1 It is recommended that the Transport and Environment Committee:
 - 1.1.1 notes the 15 objections and two comments received in relation to the advertised Traffic Regulation Order (TRO);
 - 1.1.2 sets aside the 15 objections and gives approval to make the TRO as advertised; and
 - 1.1.3 notes that a report presenting proposals for a revised approach to the proposed consultation on further extension of the 20mph network will be brought to the next meeting of this Committee.

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Objections to TRO/20/07 – Proposed Extension of 20mph Speed Limit

2. Executive Summary

- 2.1 This report details objections to Traffic Regulation Order (TRO) TRO/20/07, which will make variations to the previously implemented Traffic Regulation Order TRO/15/17 for a citywide 20mph network. It informs Committee of the objections received to the draft Order and seeks approval to set these aside and make the Order as advertised.
- 2.2 Overall 17 representations were received to the advertised Order. Of these, 15 are objections and two are comments.

3. Background

- 3.1 The Committee approved a citywide 20mph network for Edinburgh in [January 2015](#). The 20mph scheme was implemented to reduce the risk and severity of collisions, encourage people to walk and cycle and create more pleasant streets and neighbourhoods.
- 3.2 The network supports the aims of the Edinburgh's City Centre Transformation strategy and the emerging City Mobility Plan by improving the way people can move about the city and enjoy its spaces and places. In March 2018, Edinburgh became Scotland's first city to implement a citywide network of streets with a 20mph limit.
- 3.3 On [11 October 2019](#), the Transport and Environment Committee considered a report entitled Evaluation of the 20mph Speed Limit Roll Out and approved commencing the statutory process for a TRO to extend the 20mph network, by making the changes detailed in Table 1 below:

Table 1 Changes Proposed Under TRO/20/07

Street	Action
Balgreen Road	Change to 20mph from Stevenson Road roundabout to Corstorphine Road and from Balgreen Road to Whitson Terrace
Bo'ness Road	Change to 20mph from Walker Drive to Echline Avenue
Cammo Road/Walk	Extend the 20mph limit along the residential frontages and principal access to the Cammo Estate
Cluny Gardens, West Mains Road, Charterhall Road, Blackford Avenue, Esslemont Road	Change to 20mph
Craighall Road	Change to 20mph from Stanley Road to Ferry Road
Granton Road	Change to 20mph from Ferry Road to Granton Square
Greenbank Crescent/Oxgangs Avenue	Change to 20mph
Roseburn Terrace/West Coates	Introduce 20mph from Murrayfield Gardens to Magdala Crescent
Salvesen Terrace (Marine Drive)	Introduce 20mph from West Granton Road to West Shore Road junction

4. Main report

- 4.1 The TRO to reduce the speed limits at these locations was advertised between 9 October and 30 October 2020. At the end of this formal consultation period, the Council had received 17 responses. Fifteen of these were objections and two were general comments.
- 4.2 Fourteen of the objections and both comments were from individuals. One objection was received from Cramond and Barnton Community Council, expressing support for the proposed sections of the Order covering Cammo Road/Walk but making a number of suggestions to extend the 20mph speed limit further on these streets.

- 4.3 As noted elsewhere in the report, it is intended to consult later this year on levels of support for further extending the 20mph network and possible additional streets for inclusion. The locations identified by Cramond and Barnton Community Council will be considered as part of this consultation process.
- 4.4 Seven of the 15 objections were in relation to the entire Order and were based on objecting to the general principal of 20mph limits. The remaining eight objections were in relation to specific streets.
- 4.5 The three areas of concern raised most commonly in the objections were:
- 4.5.1 lack of evidence and justification for the proposed reduction in speed limit;
 - 4.5.2 reduction of the speed limit on arterial routes (these concerns were raised in relation to Charterhall Road, Blackford Avenue, West Mains Road, Esslemont Road, Cluny Gardens and Greenbank Crescent); and
 - 4.5.3 a perceived increase in congestion, leading to delays and air pollution.

Evidence and justification

- 4.6 The Council has a longstanding policy of introducing 20mph speed limits, initially focussed on residential areas and around schools. In 2012 a pilot project was launched in South Edinburgh to measure changes in vehicle speeds and volumes, road traffic collisions and the attitudes of residents to walking, cycling and the local environment. The benefits evidenced from the [pilot](#) include lower vehicle speeds in 85% of the 28 streets that were monitored, perceived improvements in the safety of streets for children, a perception of improved conditions for walking and cycling and strong support from residents of the area for the 20mph limit.
- 4.7 In developing the 20mph Programme, a monitoring programme was established to assess the various impacts of the 20mph network. A report on the outcomes of this evaluation was considered by the Committee on 11 October 2019. Findings from the evaluation revealed that slower speeds are having a positive impact on the safety and wellbeing of residents and visitors. Public support for the Scheme increased from 58% to 65% and people who walk and cycle reported they were doing so much more frequently now streets are calmer. Amongst the findings reported was a statistically significant reduction in speeds across the 66 sites surveyed, with significantly fewer people driving at over 30mph.
- 4.8 In 2017, a major independent research project was instigated by the Scottish Collaboration for Public Health Research and Policy (SCPHRP), which is a research centre at the University of Edinburgh, to examine the public health impacts of 20mph zones in Edinburgh and Belfast. Whilst this study was undertaken independently from the Council, data recorded by the Council was shared with the University to inform its research. Initial findings from the SCPHRP study reveal a statistically significant reduction in casualties, above the national trend. This study was funded by the National Institute for Health Research (NIHR).

Arterial routes

- 4.9 The network that was approved previously extended 20mph speed limits to the city centre, main shopping streets and residential areas while retaining a strategic network of roads with 30mph and 40mph limits.
- 4.10 Since the beginning of the 20mph roll out, the Council has received requests from across the city to add further streets to the network. The streets that were subsequently considered for inclusion in the 20mph network were largely based on these public requests. Additional streets where a 20mph limit is proposed have been assessed using a methodology that considered factors such as the character of the street, the available width, numbers of collisions, walking and cycling levels, the presence of traffic calming measures, bus service frequency, evidence of local public support and proximity to generators of pedestrian journeys such as schools, parks and places of worship.

Congestion and pollution

- 4.11 Vehicles travelling at slower speeds can help to promote a smooth driving style in the urban environment which helps traffic to flow. A subsequent reduction in acceleration, deceleration, gear changing and braking and a move away from 'stop-go' driving will help to reduce fuel consumption and associated emissions. Importantly, some environmental benefit from the change is also expected from helping to unlock the potential for people to walk or cycle instead of driving.
- 4.12 The Council continues to prioritise the issue of poor air quality, with a range of projects, including proposals for a Low Emission Zone and investment in high quality walking and cycling infrastructure to encourage modal shift away from private car use.
- 4.13 The benefits of 20mph limits are recognised by organisations such as the World Health Organisation, the National Institute for Health and Care Excellence and the Royal Society for the Prevention of Accidents.
- 4.14 Ongoing monitoring of the 20mph network will be undertaken to determine speed and casualty trends over a longer timeframe and the outcomes of this will be reported to the Committee in due course.
- 4.15 Further details of all the responses received to the advertised TRO and comments in response to the concerns raised are contained in Appendix 2.

Further extension of 20mph network

- 4.16 On [27 February 2020](#), the Committee considered a report entitled Approach to Extension of 20mph Speed Limits. The Committee approved a consultation process to seek views on levels of support for extending the network and for identifying further streets for inclusion. At the time of the report, it was intended to start the consultation in May 2020, with a view to reporting back to Committee on findings from the consultation in the Autumn.

- 4.17 Due to the Covid-19 pandemic and the need for physical distancing, it has not been possible to deliver the consultation as planned. It is therefore proposed to report to the next meeting of this Committee on proposals for a revised approach to the proposed consultation.

5. Next Steps

- 5.1 This report recommends setting aside the 15 objections and making the TRO. All those who objected and submitted comments will be notified of the Committee's decision.

6. Financial impact

- 6.1 The cost of design and construction work, including the installation of new signage and adjustment of existing signage, on the additional roads is estimated at £30,000. This can be accommodated within the funding allocated towards Road Safety within the Transport Capital Investment Programme.

7. Stakeholder/Community Impact

- 7.1 Statutory consultation has been carried out as part of the TRO process. The draft order was advertised between 9 October and 30 October 2020.
- 7.2 It is expected that the proposed reduction in speed limit, combined with the other proposed changes set out in this report, will advance equality of opportunity by providing an improved environment for walking and cycling, making these more attractive and accessible for less confident people, including children.
- 7.3 The positive impacts for sustainability relate to the principle that places are for people rather than motor traffic. Reducing speed on our roads, helps to create streets which are shared more equally between different road users. It also helps create a safer environment, encouraging people to walk and cycle and enjoy spending time in their neighbourhoods. It is also expected that environmental and air quality benefits will be realised if safer road conditions result in increased levels of walking and cycling.
- 7.4 An Integrated Impact Assessment (IIA) has been carried out and reviewed throughout the project. The IIA identifies a majority of positive impacts for people with protected characteristics.

8. Background reading/external references

- 8.1 [Transport 2030 Vision](#)
- 8.2 [Edinburgh's City Centre Transformation Project](#)

- 8.3 Local Transport Strategy Climate Change Framework
- 8.4 [South Central Edinburgh 20mph Limit Pilot Evaluation – Transport and Environment Committee, 27 August 2013 \(Item 7.3\).](#)
- 8.5 DfT Circular 01/2006 Setting Local Speed Limits
<http://www.dft.gov.uk/pgr/roadsafety/speedmanagement/dftcircular106/dftcircular106.pdf>

9. Appendices

- 9.1 Appendix 1 – Streets within TRO/20/07
- 9.2 Appendix 2 – Responses received to the advertised TRO and comments in response to the concerns raised

Appendix 1 – Streets within TRO/20/07

The City of Edinburgh Council (Various Roads, Edinburgh) (20 mph Speed Limit) (Variation No _) Order 202_ - TRO/20/07

The Council proposes to make an Order under the Road Traffic Regulation Act 1984, as amended, as amended, to introduce a 20mph speed limit on the following roads (the speed limit applies to the whole road unless otherwise stated): Area 7 – Balgreen Rd between Stevenson Rd roundabout and Corstorphine Rd, Blackford Ave, Bo'ness Rd between Walker Dr and Echline Ave, Cammo Rd between Queensferry Rd and the west boundary line of No. 52 Cammo Rd, Cammo Walk between Cammo Rd to a point 16m south of the extended south kerbline of the access road to Cammo Estate car park, Charterhall Rd, Cluny Gdns, Corstorphine Rd between Roseburn Ter and Murrayfield Gdns, Craighall Rd between Stanley Rd and Ferry Rd, Esslemont Rd, Granton Rd between Ferry Rd and Granton Sq, Greenbank Cres, Marine Dr between West Granton Rd and West Shore Rd, Oxfgangs Ave, Roseburn Ter between Murrayfield Gdns and Magdala Cres, Salvesen Ter, Stevenson Dr between Balgreen Rd and Whitson Ter, West Coates between Magdala Cres and Roseburn Ter & West Mains Rd. Details of the draft Order & related docs, including our privacy notice, can be viewed from 9/10/20 to 30/10/20 online at www.edinburgh.gov.uk/trafficorders or www.tellmesotland.gov.uk. Objectors must state their reasons in writing, with ref TRO/20/07, to Traffic Orders, Place, 3.3 Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG, not later than 30/10/20.

Appendix 2

TRO/20/07 - Proposed extension of Speed Limits

Total number of representations 17 (15 objections and 2 comments)

16 representations from individuals and one representation from Cramond and Barnton Community Council

7 objections to the entire Order and 8 objections to specific streets (Charterhall Road, Blackford Avenue, West Mains Road, Esslemont Road, Cluny Gardens and Greenbank Crescent)

Issue	Number of comments to the entire Order	Overall number of comments	Response
<p>Lack of evidence and justification to show that 20mph speed limits are required and that they reduce speed, improve road safety and the environment. Further monitoring is required.</p>	3	8	<p>The City of Edinburgh Council has a longstanding policy of introducing 20mph speed limits, initially focused on residential areas and around schools. In 2012 a pilot project was launched in South Edinburgh to measure changes in vehicle speeds and volumes, road traffic incidents, and the attitudes of residents to walking, cycling and the local environment. The benefits evidenced from the pilot include lower vehicle speeds in 85% of the 28 streets that were monitored, perceived improvements in the safety of streets for children, a perception of improved conditions for walking and cycling and strong support from residents of the area for the 20mph limit.</p> <p>The final phase of the 20mph network came into effect in March 2018. A report evaluating the 20mph rollout was considered by the Transport and Environment Committee in October 2019. Findings revealed that slower speeds are having a positive impact on the safety and wellbeing of residents and visitors. Public support for the Scheme increased from 58% to 65% and people who walk and cycle reported they were doing so much more frequently now streets are calmer. Amongst the findings reported was a statistically significant reduction in speeds across the 66 sites surveyed, with significantly fewer people driving at over 30mph.</p> <p>In 2017, a major independent research project was instigated by the Scottish Collaboration for Public Health Research and Policy (SCPHRP), which is a research centre at the University of Edinburgh, to examine the public health impacts of 20mph zones in Edinburgh and Belfast. Whilst this study was undertaken independently from the Council, data recorded by the Council was shared with the University to inform its research. Initial</p>

			<p>findings from the SCPHRP study reveal a statistically significant reduction in casualties, above the national trend.</p> <p>The Road Safety Team will continue to monitor the 20mph network to determine speed and casualty trends over a longer period of time.</p>
Reduction of the speed limit on arterial routes which are important connecting routes. These concerns were raised in relation to Charterhall Road, Blackford Avenue, West Mains Road, Esslemont Road, Cluny Gardens and Greenbank Crescent.	0	7	<p>The network that was approved previously extended 20mph speed limits to the city centre, main shopping streets and residential areas while retaining a strategic network of roads with 30mph and 40mph limits. Since the beginning of the 20mph roll out, the Council has received requests from across the city to add further streets to the network. The streets that were subsequently considered for inclusion in the 20mph network were largely based on these public requests. Additional streets where a 20mph limit is proposed have been assessed using a methodology that considered factors such as the character of the street, the available width, numbers of collisions, walking and cycling levels, the presence of traffic calming measures, bus service frequency, evidence of local public support and proximity to generators of pedestrian journeys such as schools, parks and places of worship. Further details regarding the methodology and assessment of streets is included in the Evaluation Report to the Transport and Environment Committee in October 2019.</p>
Lack of accessibility to papers and notification to the public re the proposed changes.	1	6	<p>Due to Covid-19 restrictions, the Council has taken the decision not to erect street notices related to current orders. The Council offices are currently closed to the public therefore it is no longer possible for us to comply with legal requirements to place documents available for inspection at Waverley Court.</p> <p>The Scottish Government has introduced temporary legislation related to Coronavirus in Scotland which removes these requirements on the basis that doing so will help avoid spreading the virus. The legislation does encourage Councils to make other arrangements where practicable.</p> <p>The proposals relating to the Order were sent to statutory consultees and were available online on the Tellme Scotland and Council websites www.edinburgh.gov.uk/trafficorders</p>
A reduction to 20mph will result in increases in congestion, leading to delays and air pollution.	1	5	<p>Vehicles at slower speeds can help to promote a smooth driving style in the urban environment which helps traffic to flow. A subsequent reduction in acceleration, deceleration, gear changing and braking and a move away from 'stop-go' driving will help to reduce fuel consumption and associated emissions. Importantly, some environmental benefit from the change is expected from helping to unlock the potential for walking or cycling instead of driving.</p> <p>We have sought the views of Lothian Buses and they have advised that, in their view, any increases in bus journey times and impact on service reliability due to the introduction of 20mph are minimal in comparison to increases in journey times and resources across the city resulting from other factors.</p>

			The Council continues to prioritise the issue of poor air quality, with a range of projects, including proposals for a Low Emission Zone and investment in high quality walking and cycling infrastructure to encourage modal shift away from private car use.
20mph doesn't improve road safety and can make roads less safe as it leads to driver complacency and driver frustration.	2	4	<p>The benefits of 20mph are recognised by organisations such as the World Health Organisation (WHO), the National Institute for Health and Care Excellence (NICE), the Royal Society for the Prevention of Accidents (ROSPA).</p> <p>Driving more slowly can prevent injuries and save lives. Research by the UK Transport Research Laboratory has shown that every 1mph reduction in average urban speeds can result in a 6% fall in the number of casualties. It's also been shown that pedestrians are seven times more likely to survive if hit by a car driving at 20mph, than at 30mph. If a child suddenly steps in front of a car, they are much less likely to seriously injure or kill them if you keep to a 20mph limit.</p>
20mph speed limits are ignored, more enforcement is required.	1	4	Police Scotland is responsible for enforcing speed limits and has been consulted as part of the statutory consultation process. Police Scotland is supportive of slower speeds and is working with the Council to achieve this through road safety education and behaviour change initiatives. The Council will continue to work closely with Police Scotland on educating all road users on the importance of road safety to achieve a cultural change and safety benefits for all.
Not a good use of resources. Money could be better spent on building and repairing roads.	1	3	Lower speed limits help to reduce the risk and severity of road collisions. Fewer casualties means less strain on the NHS and emergency services. More walking and cycling means better physical and mental health and prevention of illnesses like heart disease and diabetes, helping save NHS spending.
Traffic will be pushed into side streets, making it more dangerous.	1	2	Findings from the 20mph Evaluation Report reveal no evidence of displacement of traffic from 20mph streets to 30mph streets.
30mph is adequate, no need to change.	0	2	The 30mph limit was brought in as the national speed limit for built-up areas in 1934. Since then there has been a huge increase in the number of motor vehicles on the roads and the potential for accidents has increased. When driving at 30mph you have far less time to react to any incident. The stopping distance is also proportional to the speed so a car braking from 30mph will still be travelling at 22mph when one braking from 20mph will have stopped.
Cramond and Barnton Community Council supports for the proposed	1	0	It is intended to consult later this year on levels of support for further extending the 20mph network and possible additional streets for inclusion. The locations identified by Cramond and Barnton Community Council will be considered as part of this consultation process.

sections of the Order but makes a number of suggestions to extend the 20mph limit further on these streets.			
There is no need for 20mph to apply 24 hours a day.	1	0	It is important that operating hours are clear to avoid any confusion and help people to use streets appropriately. The majority of casualties are injured during daylight but there are still a significant number of people injured during darkness particularly in the autumn and winter months and at weekends. In addition, ensuring that the reduced limit is in effect at all times will help encourage behavioural change.