

# Transport and Environment Committee

10.00 am, Tuesday, 12 January 2016

## Objections to Traffic Regulation Order TRO/15/17 20mph Speed Limit – Various Roads, Edinburgh

Item number	7.12
Report number	
Executive	
Wards	All

### Executive summary

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The purpose of this report is to acknowledge and set aside objections to the proposed Traffic Regulation Order (TRO) for a citywide 20mph network, as shown on the Implementation Phasing Plan appended to this report.

### Links

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Coalition pledges	<a href="#">P46</a>
Council outcomes	<a href="#">CO19</a>
Single Outcome Agreement	<a href="#">SO1</a> , <a href="#">SO2</a> , <a href="#">SO3</a> , <a href="#">SO4</a>

## Objections to Traffic Regulation Order TRO/15/17 20mph Speed Limit – Various Roads, Edinburgh

### Recommendations

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

### Background

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- 2.1 On 17 March 2015, the Transport and Environment Committee approved an implementation plan for the roll-out of the citywide 20mph network. The network had previously been approved by Committee on 13 January 2015, following consultation. The report requested authorisation to commence the statutory procedures to introduce a 20mph speed limit for the approved network.

### Main report

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- 3.1 The citywide 20mph network will be implemented in six phases over 24 months. A single Traffic Regulation Order (TRO) is being promoted, which covers the streets included in all six phases.
- 3.2 The draft TRO was advertised in May 2015. In accordance with applicable legislation, notices were erected on-street, adverts were placed in the local press and copies of all of the relevant documents were made available for viewing at the reception in the City Chambers.
- 3.3 In addition to the legislative requirements set out in paragraph 3.2 above, electronic copies of all of the relevant documents were made available on the Council's website and on the Scottish Government's public information gateway, [tellmescotland.gov.uk](http://tellmescotland.gov.uk).

- 3.4 At the end of the formal consultation period, the Council had received a total of 86 responses. Of those, 27 (31%) indicated that they supported the proposals, with a further 5 (6%) making comments that can be classed as questions relating to the introduction of 20mph speed limits. The remaining 54 (63%) of responses were objections, of which 18 (21%) were objections to specific streets rather than to the whole network. 82 responses were from individuals and 4 responses were from organisations.
- 3.5 The topics which elicited the greatest number of responses, and which are directly related to the introduction of a citywide 20mph network, are considered below. Further responses received, and comments in response, can be found in Appendix 2.

### **Increase in congestion and pollution**

- 3.6 The issue of increased congestion and pollution featured in 24 objections. The respondents are concerned that reducing speed limits in the affected areas will see an increase in pollution, due to increased congestion and also increased inefficiency of vehicle engines. The main line of discussion centres on the efficiency of engines when a vehicle is travelling at 20mph compared to 30mph.
- 3.7 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.

### **Opposition to a blanket approach**

- 3.8 There were 20 comments regarding the belief that the citywide 20mph network has wrongly adopted a blanket approach. These comments stated their opposition to 20mph on arterial routes that they suggested would affect the flow of traffic throughout the city. They stated that 20mph should be limited to outside schools and residential areas.
- 3.9 The proposals are for a network of 20mph streets, chiefly in residential and shopping areas, complemented by a network of 30mph and 40mph roads on key arterial routes in the city suburbs. Those main roads, where a 20mph limit is proposed, have the greatest mix of pedestrians, cyclists and motor vehicles, and/or have a high incidence of collisions.

- 3.10 The network was developed through extensive partnership working and stakeholder engagement throughout 2014. There are a number of streets where it is proposed to retain a 30mph limit, due to the commitment made to retain a coherent network of 30mph routes across the city, despite there being significant local support for a 20mph limit.

### **Cost of the project**

- 3.11 Nineteen objectors suggested that the funding would be better spent on road maintenance, including re-marking white lines and resurfacing. The overall cost for the project has been budgeted at £2.22 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. The cost to Transport's Capital Investment Programme is estimated to be around £430,000, split over a period of three financial years.
- 3.12 It should also be noted that the Council has invested an additional £5 million in road maintenance and improvements as part of the 2015/16 budget.

### **Road safety**

- 3.13 Nineteen comments were received in relation to road safety concerns resulting from the introduction of 20mph speed limits. These concerns included the potential for people to be too focused on their speedometer to be able to see hazards, an increased danger to cyclists and increased danger around schools. However, there is no evidence to suggest that drivers will focus on their speedometers in a 20mph zone more than while driving in a 30mph zone.
- 3.14 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 has also been shown survival rates are seven times higher when a pedestrian is hit by a car driving at 20mph, than compared to 30mph. Research also shows that a child is much less likely to be seriously injured or killed if hit by a car at 20mph.

### **Journey times**

- 3.15 The issue of increased journey times resulting from a reduced speed limit was raised 15 times. Objectors stated that the introduction of lower speed limits across the proposed network will have a significant impact on vehicle journey times and in turn a significant impact on businesses.

- 3.16 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. Actual traffic speeds in 30mph zones are often significantly below the speed limit and a significant proportion of journey time is spent stationary in traffic or at junctions. 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). More research on this matter will be undertaken as part of the post implementation monitoring programme and the results of this will be posted on the Council's website.
- 3.17 A significant number of additional issues were raised in relation to the proposals. These issues, and the comments provided in response, are listed in Appendix 2.

### Next steps

- 3.18 It is proposed to introduce the citywide 20mph network over six phases. The proposed implementation dates are shown Table 1 below. The areas of the city covered by each phase are shown on the Implementation Phasing Plan appended to this report.

Phase	Proposed Implementation date
One	July 2016
Two	October 2016
Three	February 2017
Four	June 2017
Five	October 2017
Six	February 2018

**Table 1: Phasing Details**

## Measures of success

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- 4.1 The intended impacts and therefore measures of success for the project include:
- Reduction in speeds.
  - Reduction in numbers and severity of road casualties on relevant streets.
  - Increase in walking and cycling; and

- Improvements in peoples' perceptions relating to 'liveability' and 'people-friendliness' of Edinburgh's streets, for example how people feel about walking and cycling in their neighbourhoods, walking in local shopping streets, independent local travel by children and children playing outside in 20mph zones.

## Financial impact

- 5.1 The total implementation cost of the project is estimated to be approximately £2.22 million, split across three different financial years.
- 5.2 The total cost to existing Council budgets is estimated to be £1.14 million. This is made up of £430,000 from Transport's Capital Investment Programme (CIP) and £710,000 from Cycling, Walking, Safer Streets (CWSS) funding, which is ring fenced funding received annually from the Scottish Government.
- 5.3 It is anticipated that the remaining £1.08 million could potentially be obtained from successful bids for external match funding that is available for this type of project from the Scottish Government and Sustrans. Both of these organisations have previously shown support for the project and there is therefore a degree of confidence that they will be supportive of future funding bids.
- 5.4 The proposed phasing arrangements and timescales for the implementation of the 20mph network have been developed on the basis that these funding bids will be successful. Bids have to be submitted on a year by year basis, according to the potential funding organisation's timetable.
- 5.5 The cost to existing Council budgets this financial year is expected to be approximately £215,000, with a further £250,000 being provided by external funding that has already been secured. A summary of the anticipated costs and sources of funding for the project is contained in Table 2 below. A more detailed breakdown is contained in Appendix 3.

CIP	Transport Capital Investment Programme	430
CWSS	Cycling, Walking, Safer Streets (ring fenced funding from Scottish Govt)	710
Comm Links	Community Links (SUSTRANS)	950
SG	Other Scottish Govt funding	65
SCSP	Smarter Choices, Smarter Places (Scottish Govt)	65
		<b>2,220</b>

**Table 2: Anticipated Costs and Funding Sources**

- 5.6 In addition to the above there are existing funds, identified for use to provide speed reduction measures, that the Council has secured through Section 75 agreements. A review of these contributions will be undertaken to see whether this funding can be utilised for delivering the 20mph network. It is anticipated that any funding identified from this process will be used to replace funding from the Capital Investment Programme.

- 5.7 Ongoing revenue costs for the maintenance of 20mph signs and road markings will be offset by reductions in other maintenance associated with the proposal eg it will no longer be necessary to provide road centre line markings on residential streets with a 20mph limit.

## **Risk, policy, compliance and governance impact**

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- 6.1 The delivery of the project within the stated timetable depends on funding bids from external sources being successful.
- 6.2 There are no other identified risks or impacts on policy, compliance and governance arising from this report should it be approved.

## **Equalities impact**

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- 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.

## **Sustainability impact**

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- 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 and are noted as Background Reading later in this report.

## **Consultation and engagement**

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- 9.1 In accordance with the applicable legislation, these proposals have been advertised in the press and on-street by means of public notices, with letters also sent to statutory bodies representing persons likely to be affected by the proposals. Those letters were sent, among others, to Community Councils and the emergency services, as well as to all local ward Councillors. Details have also been made available on the Council and Scottish Government websites.

## Background reading/external references

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The policy of implementing a revised speed limit network across the city delivers on the following sustainable development policies:

[Transport 2030 Vision](#)

[Local Transport Strategy](#)

[Climate Change Framework](#)

[South Central Edinburgh 20mph Limit Pilot Evaluation – Transport and Environment Committee, 27 August 2013 \(Item 7.3\).](#)

DfT Circular 01/2006 Setting Local Speed Limits

<http://www.dft.gov.uk/pgr/roadsafety/speedmanagement/dftcircular106/dftcircular106.pdf>

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## Links

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<b>Coalition pledges</b>	<b>P46</b> – Consult with a view to extending current 20mph zones.
<b>Council outcomes</b>	<b>CO19</b> – Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and delivery of high standards and maintenance of infrastructure and public realm.
<b>Single Outcome Agreement</b>	<b>SO1</b> – Edinburgh’s Economy Delivers increased investment, jobs and opportunities for all. <b>SO2</b> – Edinburgh’s citizens experience improved health and wellbeing, with reduced inequalities in health. <b>SO3</b> – Edinburgh’s children and young people enjoy their childhood and fulfil their potential. <b>SO4</b> – Edinburgh’s communities are safer and have improved physical and social fabric.
<b>Appendices</b>	<b>Appendix 1:</b> City Wide Implementation Phasing Plan <b>Appendix 2:</b> Responses Received to TRO and Comments in Response <b>Appendix 3:</b> Anticipated Costs and Funding Sources



## Analysis of Comments from SLO

Total number of responses - 86

54 (63%) Objections including 18 objections to specific streets	27 (31%) Expressions of support	5 (6%) Questions
82 Responses from individuals	4 Responses from Organisations - (Fairmilehead Community Council, Grange Prestonfield Community Council, Cramond & Barnton Community Council, Motorcycle Action Group)	

### Representations

Many respondents made multiple points and raised similar issues. These are grouped together in the table below. The number of times a comment was raised is represented in column three.

Issue	Response	Number of comments
20mph proposals will increase congestion and pollution	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.	24
Blanket approach: Against 20mph on arterial routes, support 20mph in residential areas and outside schools only	The proposals are for a network of 20mph streets chiefly in residential and shopping areas, complemented by a network of 30 and 40mph roads on key arterial routes in the city suburbs.  Those main roads where a 20mph limit is proposed have the greatest mix of pedestrians, cyclists and motor vehicles, and/or have a high incidence of collisions.	20

<p>Costs of 20mph programme: Money could be better spent. Concerns that this is a cash raising venture for Council</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 will not profit from the introduction of 20mph speed limits. No money from fines will be paid to the Council.</p>	<p>19</p>
<p>Road Safety: Lack of evidence to show that 20mph will improve road safety, overtaking more dangerous at 20mph, driver frustration will lead to accidents</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>	<p>19</p>
<p>Journey times: Concerns that journey times will increase</p>	<p>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). More research on this matter will be undertaken as part of the post implementation monitoring programme and the results of this will be posted on the Council's website.</p>	<p>15</p>
<p>Concerns that 20 mph is not economical for cars and vehicles do not run efficiently at 20mph</p>	<p>Fuel consumption, pollution and engine wear are primarily affected by driving style, with hard acceleration and braking contributing to an increase in these. A 20mph limit can reduce the level of braking and acceleration and also smooth traffic flow through junctions on an urban road network.</p>	<p>13</p>
<p>Impact on business and tourism</p>	<p>It is considered that businesses will benefit from the increased "liveability" which slower speeds will foster in their area, with more people attracted to spend time in shopping streets where they feel safer and the environment is generally more pleasant.</p>	<p>9</p>

There is no need for 20mph to apply 24 hours a day	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.	8
Concerns that 20mph will not be enforced	The legal speed limits on all roads in the Capital are enforced by Police Scotland and this will be no different whether the street is 20, 30 or 40mph. Police will direct their resources to particular problem areas, as they do currently, and drivers caught flouting the limit will face warnings or speeding fines.	8
Speed Limit Order and Consultation poorly advertised	The Council has followed statutory procedures for the advertisement of a Speed Limit Order. The SLO was advertised in the Press, on the Council's Traffic Orders page and by erecting notices on every affected street throughout the city. The public consultation on 20mph speed limits last year was promoted in the Press, on the Council website and on social media. An engagement programme of meetings and drop in events was held in each of the neighbourhood areas across the city and road show events were held in the Gyle and St James Shopping Centres. Posters, information and flyers were distributed widely across the city.	5
30mph is adequate	The 30 mph 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 30 mph you have far less time to react to any incident. The stopping distance is also proportional to the speed so a car braking from 30 mph will still be travelling at 22mph when one braking from 20mph will have stopped.	3
Concerns re increase in street clutter	The design will rely primarily on signage and road markings. A careful balance will be required between adequate signage and minimising street clutter. Each street will be considered on a case by case basis, and existing street furniture will be used to erect new signage wherever possible. Extra care will be taken in sensitive locations such as conservation areas and around historic buildings.	3

<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>We have sought to comply with Scottish Government Good Practice Guidance. Clause 55 states: 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>3</p>
<p>Lack of consistency in speed limits</p>	<p>We have sought to avoid too many or unpredictable changes in speed limits. The network has been developed using an agreed set of criteria and by applying a consistent approach across the city. It was also important to ensure a network of 30 and 40 mph roads on key arterial routes in the city to keep traffic flowing.</p>	<p>2</p>

### Objections to Specific Streets being reduced to 20mph

A number of objections were received from individuals who did not support the speed limit for a specific street being reduced to 20mph. However, in developing the 20mph network, a consistent approach was applied across the city using a robust set of criteria to establish a network of 20mph streets in the city centre, main shopping streets, residential areas and areas with high levels of pedestrian and cyclist activity. Streets outwith these categories would generally have a speed limit of 30mph. It was important to achieve a balance by retaining a network of roads at 30mph and 40mph on the key arterial routes to allow traffic to flow.

There has been extensive consultation and research carried out over the past few years which show a high level of public support for the 20mph proposals. Feedback from the consultation has also helped to define the network. The proposed 20mph network was then approved by Elected Members at the meeting of the Transport and Environment Committee on 13 January 2015.

Monitoring of the network will be undertaken a year on from implementation, with the findings presented to Committee for consideration.

Those streets for which specific objections to a reduction in the speed limit to 20mph are listed below.

Main Roads	Comments	Number of Comments
Melville Drive	Against inclusion of major 'spine' roads in the TRO. Melville Drive should remain at 30mph. This is not a residential or shopping street. The street is already very well served (if not over-served) by pedestrian crossings and already has segregated cycling. It's a long wide road and 30 mph is perfectly safe.	5
Ravelston Dykes and Ravelston Dykes Road	Roads like Ravelston Dykes Road are not purely residential they have to be considered as part of your coherent and connected network of 30mph and 40mph roads in Edinburgh. The inclusion of these roads at 20mph is not consistent with their status as main routes through the area. For comparison see Craighleith Road between Queensferry Road and Comely Bank, which is a similar size of road and similarly trafficked but remains 30mph. Ravelston Dykes Road, in particular, has few properties. However, if you are not willing to accept this objection could you please alternatively treat Ravelston Dykes and Ravelston Dykes Road as '20mph Strategic and Secondary' rather than '20 local'. This would be consistent with, for example, the routes through the Grange or the Meadows.	4
Braid Road Braid Road/Pentland View Braid Road/Buckstone Terrace	Braid Road is a main arterial road and if traffic speeds are lowered to 20mph it will result in traffic bunching causing people to exceed the limit and if not exceeding then feeling that they are holding other drivers up. Braid Road and similar roads in the city are distributor roads and not suitable for a 20mph speed limit. To impose a 20mph street on Pentland View and similar streets is useless unless you install calming measures to achieve a speed reduction. Signs alone will not work in achieving a 20mph speed limit. At the moment it is 30mph coming off a 40mph road. We have vehicles coming down this road still at 40 let alone 30. There is no way they will be doing 20!	3

Leith Walk	Against the inclusion of major 'spine' roads in the TRO. Council already has trouble with congestion on many of its roads and limiting major arteries will make matters worse.	2
Strachan Road	Will cause congestion to and from Queensferry Road. This particular road is wide and is connected to a road that has a 40mph speed limit and as such the differential in limits is likely to cause rather than reduce accidents (vehicles crossing over the junction from Telford Road 30mph/going to 40mph over the Queensferry Road then rapidly reducing to 20mph at Strachan Road.) It seems strange that you will be maintaining Craigcrook Road at 30mph but moving Strachan Road to 20 mph.	2
Woodhall Road	This is a main road and a bus route from/to Torphin. It is a wide road which leads on directly from Colinton Road - which will retain a 30mph limit. 30mph seems logical for this larger road. A sudden requirement to brake to 20mph where the road divides at Woodhall Road / Bridge Road gives the potential for a serious driving hazard. You may also wish to consider retaining the 30mph limit on Woodhall Road - which is observed by local residents - and put a 20mph light-up sign at the foot of Bonaly Road operational at the times of Bonaly school entry / exit.	2
Morningside Road, Slateford Road, Leith Walk and Lauriston Road	Council already has trouble with congestion on many of its roads and limiting major arteries will make matters worse.	1
Some of the specific roads we believe should remain at 30mph are Saughtonhall Drive, Ellersly Road, Murrayfield Road, Ravelston Dykes, Ravelston Dykes Road, Craigrood Road, Queensferry Road, Dean Bridge, Queensferry Street, Queen Street, Russell Road, Haymarket Terrace, Morrison Street, Melville Drive.	The same principle should apply to the rest of the distributor network unless there are specific local issues requiring a speed limit reduction for safety reasons. 20mph is a difficult speed to maintain unless the road environment is giving driver cues that signal a need to reduce speed. Such cues are absent from many of the distributor roads covered by the Council's proposals.	1
South side: Mayfield Road, Blackford Ave (north), Kilgraston Road, Grange Road, Beaufort Road, Melville Drive New Town: Dundas Street	Scope of 20mph streets too broad. The choice of streets to include should be reviewed with relevant criteria to provide a more practical scope of restrictions	1
Saughton Road North to Corstorphine High Street.  Meadow Place Road.	This is a long main road and the shopping areas along it are well-recessed from the road, with off-road parking and very well served by pedestrian crossings and traffic islands. The shops are not open all day and a 20 mph limit (whilst not making sense for this road in the first place) makes even less sense outwith rush hour when it's quiet - both traffic and pedestrian-wise.  This is a main road with 4 lanes of traffic at peak times. There are no shops directly on this street and does not have high pedestrian or cycle traffic. In any event there are pedestrian crossings at either end of the road close to each other. You almost never see pedestrians trying to cross elsewhere therefore	1

<p>Ravelston Dykes -</p> <p>Queen Street.</p> <p>Roseburn Street.</p> <p>Russell Road.</p>	<p>slowing the traffic will be pointless.</p> <p>This is a main road with little to no pedestrians, few cyclists and no shops. It is a wide street with homes all well-recessed from the road. I don't see how this road even meets the criteria set by the council.</p> <p>This is a vital arterial route in the city. Pedestrians do not attempt to cross outwith the many crossings as the volume of traffic and width of the street does not facilitate this. Therefore reducing the speed on this wide, multi-laned road does not make sense and will only cause further congestion, especially when the traffic has already been held up for 5 mins at York Place by 2 trams passing. It is not a shopping or residential street.</p> <p>This is a not a shopping street, very few pedestrians. Wide road. 20 mph is unnecessary and doesn't suit the road.</p> <p>This isn't a shopping street, not a residential street and very few pedestrians. Totally unnecessary to change the limit here.</p>	
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### Suggested Additions to the Speed Limit Order

Road	Comments	Response
Broomhall, Westerbroom	I believe 20mph is a good idea so why not include the whole of housing estates eg Broomhall, Westerbroom etc	Broomhall and Westerbroom are already included as 20mph
Peffermill Road  Charterhall Road Blackford Avenue West Mains Road Esslemont Road Lady Road Cluny Gardens Duddingston Road West Holyrood Park Road to Old Church Lane	We would like to see 20mph applied to the full length, not the proposed '4' way split – 30/20 when school signs are on/30/and proposed new 20 – this would be easier for drivers, safer for cyclists and the primary school, make it easier for buses to turn in and out of the 'bus gate' and for turnings in and out of the busy University sports ground. It will be very confusing for drivers to have to work out which speed limit applies on which section of the same road.  Busy signed cycle route  Significant cycle route crossing and High School	The SLO provides an opportunity to make official representations and objections to the Order should there be specific issues to modify or stop the order. However, it is not within the scope of the SLO to add streets.
Gilmerton Road Drum Street (north of Candlemaker's Park) Kirkbrae Lasswade road (north of Captain's Road	They all have very narrow sections, a mostly residential character and there are several schools	As above
Gamekeepers Road Cramond triangle (Whitehouse Road and Cramond Road North) Barnton Park View	Serves two schools	It is considered that Gamekeeper's Road should retain a 30mph limit. However, Barnton Park View, Whitehouse Road and Cramond Road North are included within the 20mph network

**Comments for Specific Streets currently within Speed Limit Order**

<b>Road</b>	<b>Objection</b>	<b>Response</b>	<b>Number of Comments</b>
B800 Queensferry Road in Kirkliston finishing at Eilston Loan	This 20mph limit needs to be extended well beyond the junction so that it encompasses the area of the bus stops used by school children using the high school buses. Preferably it should run all the way to the 50mph limit to provide protection for the many people who walk on the very narrow pavement alongside this road. The current situation is an accident waiting to happen as a large percentage of vehicles speed up to the 50mph limit - and beyond - as soon as they clear the last speed pillow. These traffic calming measures have never been updated since the 30 limit was extended to allow for the building of the North Kirkliston development.	In areas where new developments have recently been constructed a second, separate SLO will be promoted which will include any new streets for which it is considered a 20mph is appropriate.	1
North Gyle Drive	No justification	Local route in a residential area	1
The Wisp (Niddrie Mains Road, Duddingston Park South, Duddingston Road West)	I believe the 20mph proposals for the area around the Wisp will only serve to make the traffic flow significantly worse, contributing to more pollution	Streets around the Wisp are already mostly 20mph	1

## Questions/Corrections

Questions/Corrections	Response
Oswald Road - Should be excluded as it lies within an existing Scheme	Part of Oswald Road is included in an existing Scheme. All of Oswald Road is now part of the 20mph network.
Margaret Rose Avenue, Margaret Rose Crescent, Margaret Rose Drive, Margaret Rose Loan, Margaret Rose Walk and Margaret Rose Way - All within an existing 20mph zone and should be excluded.	These streets are within an existing 20mph zone and will be removed from the TRO.
Pentland Terrace - It is within an existing 40mph limit being a continuation of Buckstone Terrace which has the same 40mph limit and is not included. It is our understanding that existing 40 mph roads are not affected.	40mph roads are not affected as part of the 20mph programme. Pentland Terrace consists of two parts. Pentland Terrace ( the continuation of Comiston Road) remains at 40mph. Pentland Terrace (off Braid Hills Road) is included in the TRO.
Back Dean is included in the schedule of roads where 20mph will apply under the above traffic order. Back Dean is a private road wholly owned and maintained by its residents. It is therefore unclear what authority Edinburgh Council has to impose this (or any other) restriction on it.	The Council is allowed to set the speed limits on all roads under Section 84 of the Road Traffic Regulation Act 1984.
Archibald Place, Boroughloch Square, Charles Street, Charles Street Lane, Cuddy Lane, Stable Lane, Tipperlinn Road (Part), Cuddies Lane, Margaret Rose Avenue (Part), Margaret Rose Drive (Part), Margaret Rose Way (Part) should all be removed from the Order	The Council is allowed to set the speed limits on all roads under Section 84 of the Road Traffic Regulation Act 1984.
I saw the advert in the Scotsman today and was surprised to see that Blinkbonny Road, Ravelston EH4 was not one of the streets included in the 20mph list. Could you please advise if this is correct or just an oversight and that Blinkbonny Road will be included for the 20mph rollout?	Blinkbonny Road, Ravelston is included within the 20mph network.
I note that Craigleith Avenue South (EH4 3LQ) is shown on the map as included in the 20mph zone, but it is not included on the 'List of Roads Affected', nor is it on the 'Advert' download. Craigleith Avenue North is listed, but that is an entirely separate road one block away. You may wish to revisit this as it may well be that any attempt to put up 20mph signs on Craigleith Avenue South would not be entirely correct if the order has not been properly made!	Due to an administrative oversight Craigleith Avenue South was not included in the TRO but will be added.
Gordon Terrace Road should be excluded. There is no such locus, there is Gordon Terrace so it is assumed this is what is meant.	Gordon Terrace Road should not have been included in the TRO as there is no such street. Gordon Terrace is currently a 20mph street, and no change is proposed.

<p>Bridge Road - Edinburgh is listed there are 2 Bridge Roads - one at Balerno and one in Colinton Village, both within Edinburgh. A further description of the locus meant is required.</p>	<p>Bridge Road, Colinton, is included within the Order as 'Bridge Road, Edinburgh'. It is proposed that Bridge Road, Balerno retain a 30mph speed limit.</p>
<p>Please advise what the planned measures are for Lennel Avenue in relation to the above traffic order. How many signs will there be in the street and where exactly will they be positioned. Will there be any traffic calming road humps installed and if so where will they be positioned.</p>	<p>The design will rely primarily on signage and road markings and a careful balance will be required between adequate signage and minimising street clutter. Each street will be considered on a case by case basis. Extra care will be taken in sensitive locations such as conservation areas and around historic buildings.</p>
<p>Rose Street - The recommended 20mph limit of pedestrian zones eg Rose Street and access lanes is excessive and should be reduced to 5 mph.</p>	<p>The Council can impose a range of speed limits and 20mph is the lowest speed limit at its disposal</p>
<p>Would it not be possible to have a standard speed on all roads within the city? For example 25mph as an average of the current limits. As proposed, my journey to work would be 20/30/40/30/40 and its only 5 miles from door to door!!!! It would be less complicated, easier to implement and would require less signage cluttering up our streets</p>	<p>The Council can approve a range of speed limits but 25mph is not a speed limit at the Council's disposal.</p>

<b>Expressions of Support</b>	<b>Number of Comments</b>
General support for 20mph programme	10
It will improve the environment of the city	8
20mph will encourage active travel	4
20mph will improve road safety	7
Good to see a shift in emphasis from motorists' needs to more vulnerable road users	2
Reduced speed will increase safety	1
There will be economic benefits	1

**Appendix 3 – Anticipated Costs and Funding Sources**

	2015/16					2016/17				2017/18			Total £k
	CEC Budgets		External Bids			CEC Budgets		External Bids		CEC Budgets		External Bids	
	CIP £k	CWSS £k	Comm Links £k	SG £k	SCSP £k	CIP £k	CWSS £k	Comm Links £k	SG £k	CIP £k	CWSS £k	Comm Links £k	
<b>Design + Construction</b>		150	150			300	250	550		100	150	250	<b>1,900</b>
<b>Awareness Raising</b>		30			65		60				35		<b>190</b>
<b>Monitoring</b>		35		35		30			30				<b>130</b>
<b>Total</b>	<b>0</b>	<b>215</b>	<b>150</b>	<b>35</b>	<b>65</b>	<b>330</b>	<b>310</b>	<b>550</b>	<b>30</b>	<b>100</b>	<b>185</b>	<b>250</b>	<b>2,220</b>
		<b>215</b>		<b>250</b>		<b>640</b>		<b>580</b>		<b>285</b>		<b>250</b>	

CIP	Transport Capital Investment Programme	430
CWSS	Cycling, Walking, Safer Streets (ring fenced funding from Scottish Govt)	710
Comm Links	Community Links (Sustrans)	950
SG	Other Scottish Govt funding	65
SCSP	Smarter Choices, Smarter Places (Scottish Govt)	65
		<b>2,220</b>