



# QUEENSFERRY and DISTRICT COMMUNITY COUNCIL



## FORTH REPLACEMENT CROSSING SUB-COMMITTEE

Regulations Consultation  
Forth Replacement Crossing  
Principal Contract Project Office  
King Malcolm Drive  
Rosyth  
*via email*

12 February 2012

FAO: Andrew Pope, Policy Manager

Dear Mr Pope

### **M9/A90/M90 Trunk Road (Kirkliston to Halbeath) (Variable Speed Limits and Actively Managed Hard Shoulder) Regulations 2012 and The A823(M) Trunk Road (Pitreavie to Masterton) (Variable Speed Limits) Regulations 2012**

Thank you for your letter and enclosures of 18 January 2012 inviting Queensferry & District Community Council (QDCC) to comment on the above proposed regulations. QDCC has considered the proposed regulations and sought feedback from the community and we wish to make the following comments:

1. QDCC welcomes the proposed arrangement of an actively managed hard shoulder to allow buses to use the hard shoulder as a bus lane at any time except when a red cross is displayed, rather than restricting the use of the bus lane operation to certain times of the day only. This will help buses keep to their time when congestion occurs out-with the normal peak hours, such as during an incident on the Forth Road Bridge.
2. QDCC requests the proposed minimum passenger carrying requirement of 28 for buses to use the hard shoulder should be revised to 24, which is typically the minimum passenger capacity of a public service bus. QDCC feels that stipulating a minimum capacity of 28 could discriminate against smaller operators from starting services with small vehicles. This could also cause difficulties for existing operators already using the M90 if operational reasons necessitated the use of smaller buses rather than the usual large coaches. The Regulations should be clarified to note if this minimum requirement relates to total passenger capacity including standees to avoid any confusion: for example a modern minibus has 27 seats but can carry 47 passengers including standees.

The consultation asks for respondents' comments on safety, to which QDCC makes the following observations:

3. QDCC welcomes the provision of emergency refuge lay-bys as provided on the M42 active traffic management scheme.
4. QDCC also welcomes the proposal to permit buses to travel at up to 40mph when using the hard shoulder as a bus lane, unless a lower speed limit is

indicated by VMS gantries. This is the current speed being observed on the M90 and has had no noticeable effect on overall journey times.

5. QDCC requests that safety procedures be in place where a vehicle enters an emergency refuge area. In such instances the Traffic Scotland operator should close the hard shoulder to buses until the intentions of the driver are known, and to allow a stopped vehicle to safely exit the lay-by to rejoin the main carriageway. This procedure is used on the M42 and would reduce the risk of any collisions between buses and other vehicles on the hard shoulder occurring.

I hope these comments are helpful, and thank you once again for giving QDCC the opportunity to comment on the proposals.

Yours sincerely,

[REDACTED]

Queensferry & District Community Council



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