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DRAFT 3/4/12

Our Reference: SES-Bus

Regulations Consultations
Transport Scotland
Forth Replacement Crossing
Principal Contract Project Office
King Malcolm Drive
Rosyth
KY11 2DY

M9/A90/M90 Variable Speed Limits and use of Hard Shoulder by Buses Consultation

SEStran welcomes this opportunity to comment on the proposed Regulations for Variable Speed Limits and Actively Managed Hard Shoulders.

SEStran fully supports the proposed Variable Speed Limit measures and see no need to comment further on this issue.

We do also support in principle the proposals for Actively Managed Hard Shoulders which will allow these to be used by buses. However, we do have reservations about certain details of these proposals as indicated below.

We consider that the proposal to restrict the use of the hard shoulders to buses which can carry more than 28 buses to be too restrictive and this limit should be lowered.

You state that this limit "will control the number and type of buses that can use the bus lane and allow the operation of the bus lane to be monitored to ensure that it is operating safely and in accordance with the design of the bus lane."

You do not however put forward any evidence why these objectives cannot also be achieved by setting the limit at a lower seat number.

There are 'midibuses' used for local bus services with lower seating capacities (e.g. the ML Slimline Optare Solo with 25 seats) and we would also support the use of the hard shoulders by 'minibuses' with even lower seating capacities.

Other legislation related to bus sizes typically categorise buses into those with 17 or more seats and also those with 9 or more seats.

It is also the case that the existing bus lane between Ferry Toll and the Forth Road Bridge is restricted to buses with 8 or more passengers.

We would therefore suggest that the proposed regulation should be reconsidered and that a lower minimum seating capacity limit should be adopted.

We are also concerned that "the bus lane will be discontinuous due to the presence of slip roads at junctions". We accept that this is 'unavoidable' at Masterton junction but we would argue that at Admiralty and Ferry Toll junctions, the bus lanes should be continuous down and up the slips which would improve the efficiency and safe operation of the bus lanes.

I would however reiterate that SEStran fully supports the principle of hard shoulders being used for the operation of buses and would argue that this principle should in due course also be adopted for The Edinburgh by-pass (in conjunction with our proposals for an 'Outer Edinburgh Bus Rapid Transit' as well as on the M8 for express bus services between West Lothian and Edinburgh.

I trust that this response will be of assistance.

Should you wish to discuss the issues further, please contact myself

[REDACTED]

Yours sincerely

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