

## CONSULTATION

The Scottish Ministers welcome comment on the proposal to make the Regulations and in particular in relation to the bus lane provisions, and would welcome any specific reference to safety considerations by consultees in support of their comments.

With regards to the above consultation ACPOS would offer the following comments:

### **Variable Speed Limits:**

Overall ACPOS is comfortable with the implementation of Variable Speed Limits on these roads as it can only be a positive measure in dealing with the congestion that invariably occurs at peak times.

There is mention in the supporting paperwork that “Traffic flow and speed on the M90 and A823 (M) will be monitored by detectors in the road” is the M9 Spur being monitored differently, or will there be a reliance on the CCTV cameras being fitted to the gantries? The question must also be asked in respect to how offences will be enforced? Will the relevant Safety Camera Partnership monitor cameras?

### **Actively Managed Hard Shoulder:**

Concerns have been raised that the use of the hard shoulder by buses capable of carrying more than 24 passengers will be alien to other road users who may feel threatened or intimidated being undertaken by such a vehicle if the speed on the main carriageway is slow or restricted.

It is my understanding that the actively managed hard shoulder will be monitored by a system of cameras, the images being viewed by an operative within the Traffic Scotland control centre. Does this system cover the full length of the actively managed hard shoulder? If so will it be monitored on a 24 hour 7 days a week basis?

The sightlines of vehicles using the Actively Managed Hard Shoulder need to be considered, for example if a vehicle breaks down or is involved in a collision and is unable to reach the emergency refuge area and comes to rest within the Actively Managed Hard Shoulder, will a bus be able to see the disabled vehicle in good time and react to its presence? If not there could be a collision or the driver of the bus may have difficulty obtaining a view in their offside rear view mirror, if for instance the obstruction was on the left hand bend, which a large portion of the proposed actively managed hard shoulder is within the Lothian and Borders Police area. This could be a potential danger for vehicles using lane 1 of the motorway, if the bus were to attempt to rejoin the main carriageway.

If an appropriate bus enters the Actively Managed Hard Shoulder will that bus be required to remain there until the sign-posted end of that lane, excepting an emergency situation? If not there is the potential for conflict with vehicles using lane 1 of the motorway.

There is a belief that un-authorised vehicles will use the Actively Managed Hard Shoulder as a third lane when congestion is present.

ACPOS can understand the desire to create the Actively Managed Hard Shoulder for the use of buses capable of carrying more than 24 passengers to ease congestion and

reduce the journey times of these buses, however we feel that the potential real time safety concerns need to be taken into consideration. If implementation takes place there will need to be a long-term publicity strategy put in place to re -educate road users to use of the hard shoulder by buses.