

# Living Streets Edinburgh Group: Comments on the City of Edinburgh Council's Draft Active Travel Action Plan 2023

## introduction and Summary

We are pleased to see a new draft Active Travel Plan which is a significant improvement on previous versions and which makes major strides to reflecting the sustainable travel hierarchy with walking and wheeling at the top. "We particularly want to increase our focus on walking and wheeling" (Cllr Arthur, Foreword) is a very welcome statement of intent.

Our reservations concern processes and delivery, rather than policy. There have been a plethora of plans in recent years with too little focus on delivery. While the ATAP is described as "a delivery plan", it is disheartening to hear that the next steps are a 'Business Plan' and 'delivery programme' rather than actual delivery. The 'Actions' listed in the Plan are far too far too much about 'process', not action: typically "developing plans", "setting priorities", "establishing criteria", etc.

We also are sceptical that the Council has in place the right resources to deliver the Plan's intended outcomes, both with regard to capital investment and in staffing. There needs to be an increased focus on routine, 'bread and butter' improvements for pedestrians, and less focus on glamorous 'flagship' schemes.

Our principal comment would be: "just get on with it!"

## Chapter 4: Improving Walking and Wheeling in Edinburgh.

There is a lot of very welcome emphasis on improved accessibility of pedestrian environments. Two key programmes (both very much reflecting long-standing LSEG aspirations) include:

- EASI (Edinburgh Accessible Streets Initiative): an enhanced programme of filling in dropped kerbs, continuous footways, tightening junction radii, decluttering, etc.
- ABC (Action for Better Crossings): reducing wait times for green man; promise for 'on-demand' green man for most standalone crossings; promise to review pedestrian crossing priority criteria, etc. More clarity is needed on exactly how many crossings will be improved - which can often be done with a very small budget.

Our main concern with this section is that there is no general commitment to widen footways: the Plan only appears to address 'pinch points'. We want to see a commitment to meet Edinburgh Street Design Guidance (ESDG) standards at least in High Streets/'strategic priority' streets - and not just 'absolute minimum' standards.

While we very much welcomed the introduction of the ESDG when it was first produced in 2015, it's become clear that it is too full of loopholes: for example, many design fails for Leith Walk are justified as 'compliant with ESDG'. It needs to be reconsidered, amended and above all, delivered.

## **Chapter 5: Improving Cycling in Edinburgh**

We welcome the continued commitment to making cycling easier and safer across the city. However, there needs to be more emphasis on tackling antisocial and aggressive driving, rather than almost entirely focussing on cycle infrastructure. Cyclists and pedestrians have strong common cause in reducing traffic danger, and this cannot be tackled by street design alone.

The acknowledgement that “there is a fixed amount of space in our existing streets” is welcome: there needs to be a sensible caution on over-committing to the widespread installation of dedicated cycle routes. These will not always be possible without introducing an unacceptable impact on space for other modes - very much including walking. We would especially welcome more bus lanes, providing safer space for cyclists as well as improving bus services.

We query if the aspiration to make a city where “cycling is a realistic choice for everyone” is appropriate - this may alienate many people (especially older and disabled people) who will never want, or be able, to cycle. Nothing is said about managing potential conflict between pedestrians/ bus passengers and cyclists at bus stops (bypasses etc).

## **Chapter 6 :Joint activity**

The Actions on traffic speed are all about extending lower speed limits to more streets; but there’s nothing on enforcing them: this is a big omission which we comment more about in our response on the draft Road Safety Action Plan.

There is very little specific action proposed about improving infrastructure around schools (J5: “Programme of street changes to deliver on actions identified by school travel plan reviews”). Are there sufficient staff resources to properly prepare and deliver a school travel plan for every school in the city? Edinburgh has a big opportunity to build on the high walking rates which the city enjoys which the Plan should seize.

## **Delivery and resources**

The *actions* in the Plan do not adequately reflect the professed increased emphasis on walking and wheeling. Many actions purely about cycling are badged as ‘joint’ actions and the existing Active Travel Investment Programme (delivery of this is J1) is overwhelmingly about cycling (the ATIP includes 9 actions principally for walking; 33 for cycling). The ATIP will occupy so much staff resource that we are sceptical that there will be resource to deliver the intended ‘walking’ improvements noted above (for better access, pedestrian crossings and wider pavements etc).

The Plan acknowledges that the scale of ambition requires significant additional resources, many of which are not yet guaranteed. We therefore suggest having two targets - one for delivery with existing budgets; another aspirational (assuming additional funding is secured).

We want to see a commitment to a much more assertive use of S75 funding (and voluntary arrangements) to ensure that developers contribute funding to pedestrian improvement - e.g. to

pay for pedestrian crossings, dropped kerbs, etc. The Council must leverage an appropriate contribution from commercial development, which it is currently failing to do.

We believe the Plan has too much emphasis on woolly 'behaviour change' activity; more staff resources should be directed towards tangible infrastructure change on the ground.

Better maintenance and routine improvements to pedestrian crossings, junctions and pavements need to be more prominent in these plans. Indeed, there is a case for increasing staffing in these areas, even if this means fewer staff dedicated to 'active travel' (see also change management below).

### **Monitoring, evaluation and change management**

We are disappointed that there is no review of to what extent the previous ATAP was delivered: including what wasn't and why? We have been frustrated over many years over the repeated failure to implement 'priority actions' for walking (such as improving pedestrian routes to bus stops and installing dropped kerbs). This isn't just an academic question; we need to understand why targets were missed and to understand lessons learnt. It is essential to consider this, otherwise what wasn't delivered in the last ATAP won't be delivered in this one.

This raises an important issue of change management - does CEC have enough staff with the right skills, expertise and commitment to deliver the for everyday walking? And for the accessibility improvements? Our experience over the past decade suggests not.

The section on monitoring arrangements for targets need to be significantly improved. There needs to be more robust collection of walking and wheeling data, which is routinely absent in decision-making. The draft Plan is far too dependent on Sustrans' Walking and Cycling Index (formerly BikeLife) <https://www.sustrans.org.uk/media/10445/edinburgh-walking-and-cycling-index-2021.pdf> which we consider lacks credibility and if used, needs to be much better triangulated with other sources, for example the annual Scottish Household Survey and direct monitoring by the Council. (We note that Edinburgh has a limited number of monitors that record pedestrians as well as cyclists. Most of these are however located in places of relatively high cycling use rather than high footfall (eg, there are none on Leith Walk, Junction St, South Bridge, Home St, etc <https://edintraveldata.drakewell.com/publicmultinodemap.asp>)

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