

Living Streets Edinburgh Group: Comments on the City of Edinburgh Council's draft CEC Road Safety Plan 2023

Introduction and summary

The draft plan <https://democracy.edinburgh.gov.uk/documents/s52668/Item%207.7%20-%20Draft%20Road%20Safety%20Action%20Plan%20Delivering%20City%20Mobility.pdf> is very disappointing and unfit for purpose in making progress towards the overall aim of 'Vision Zero' with streets free from significant numbers of killed and serious injury (KSI) casualties. The treatment of pedestrian safety in the plan is complacent in the extreme, given that the trend in pedestrian KSI casualties (p8) or child KSI casualties (p12) show no evidence of any decline since 2011 up to 2019, with the 2020 figures being irrelevant in the Covid context. There is also no discussion at all of the trends or problems affecting older pedestrians in the section on older road users. This is unforgivable given the increasing proportion of older pedestrians and their heightened vulnerability when involved in collisions or falls in the road environment.

Vision Zero and Speed Management

We are particularly disappointed that the draft plan includes none of the modest measures proposed by Living Streets Edinburgh in our 'Slower Speeds, Safer Streets' Action Plan to reduce speeding: <https://www.livingstreetsedinburgh.org.uk/2021/11/17/slower-speeds-safer-streets-for-edinburgh-an-action-plan/>. Without such measures, some of which are cost free and others involve very little expenditure, there is no prospect of achieving anything approaching Vision Zero. We request that these proposals should be revisited with a view to their inclusion in the CEC plan.

Reduced speed limits with the extensive introduction of 20mph limits over recent years has made an important contribution towards safer streets in Edinburgh, despite a lamentable lack of enforcement. The recently introduced proposals to further extend the coverage of 20 mph speed limits is most welcome. If implemented in full, and all streets and street sections where there are concentrations of pedestrian activity are included, this will allow substantial reductions in casualties to be achieved.

The extent of any such reductions, however, will be dependent on further traffic calming engineering and enforcement measures that are effective in combating high speeds.

Some new traffic calming can be expected under existing programmes such as the welcome Low Traffic Neighbourhood and 20 Minute Neighbourhood Initiatives, but it seems unlikely that more than 2 or 3 of these will be finalised and fully implemented by 2030. Some follow up investigation (and implementation?) of possible speed reduction measures is promised (P18) where speeds on 20mph streets are found to be in excess of the 'normal tolerance'. But there is no analysis of the current and necessary levels of this activity. A major scaling up is certain to be required, backed by a budgeted implementation programme, in order to meet the needs. And what is proposed to happen where physical speed reduction measures are deemed not to be appropriate?

Enforcement

The enforcement regime must be made more effective and comprehensive, with better coverage of 20mph limit streets/areas in particular, if Vision Zero is to become a realistic aim. At present there are no fixed speed cameras capable of working in 20mph streets in Edinburgh: we call for such cameras to be introduced in key locations including where there are known road safety risks and near schools which are located on busy roads. Furthermore, Police Scotland rarely monitors speeds using mobile cameras on any of the 20 mph streets in Edinburgh.

It is appreciated that CEC lacks the power to undertake enforcement activities; it should be lobbying for more powers to be devolved, and for the camera partnership funding to be increased by retaining fines revenue to fund additional monitoring and enforcement activities.

Discussion and analysis of enforcement within the draft plan is minimal and non-existent in relation to the incidence and reduction of pedestrian (or other) KSI casualties. No analysis is included of the extent or effectiveness of current enforcement activities undertaken by the police; for example in following up where speeds have been found to be above the 24mph average speed in 20mph streets. More comprehensive monitoring of speeds across the city appears to be promised 'where non-compliance with limits has been raised' as an issue (p18), but there needs to be an equally comprehensive follow up in terms of enforcement activities.

Specific points

A number of new casualty reduction targets are set within the draft plan but no new or specific measures proposed that address these targets. Presumably therefore it is assumed that existing programmes alongside the extension of the reduced speed limits, and reliance on increasing traffic levels that continue to reduce speeding opportunities, will be sufficient to meet the targets.

It is also unclear how the targets have been set or from what base they are being calculated. Trend lines to meet the targets are illustrated from 2023 but from what starting point is not clear. Nor is 2021 data included in the previous trends charts although it is available; as now is some 2022 data. We have already suggested that, given data for 2020 and 2021 is unreliable owing to the effects of the Covid19 epidemic, the use of 2019 data as a base would be a pragmatic approach to take. Alternatively an average of the 3 years from 2017 -2019 would be appropriate.

As stated (P18) the incidence of average speeds above a tolerance level (of 24mph) is being used as the criterion for triggering potential action to reduce speeding. In isolation this is not adequate since it is the existence of very high speeds that creates the most danger, and the 85% of speeds should also be an equal if not a more important criterion. Designing out such very high speeds should be a top priority on 20mph streets. It is often the case that a single hump or a raised crossing can eliminate the risk of such speeds.

There should also be a commitment to raise pedestrian crossings to be at grade for pedestrians rather than for traffic wherever possible. This would improve both the safety of crossing activity and the perceptions of safety by more vulnerable pedestrians such as the elderly or less mobile. Where speed limits are reduced to 20mph there should be a presumption that all new or improved crossings, whether formal or informal, will be raised. On local streets, raised crossings would act as additional traffic calming measures at the most important points of conflict with pedestrians, and assist in achieving greater compliance with the speed limit. On main roads, where traffic calming measures designed to reduce speeds to 20mph can be more problematic for larger vehicles, and for buses in particular, measures with less severe slopes can be introduced that reduce speeds without having other negative impacts on traffic. It is good to see examples of this already being introduced in Edinburgh, such as those on Grange Road, with extensive raised sections around crossing points.

Pedestrian Falls

Injuries from pedestrian on-street falls with no collision involved (Pedestrian Falls Injuries; PFIs) are omitted from consideration from the draft plan, despite the fact that they are of vital importance for the road safety of pedestrians. This gap has been customary in road safety practice simply because the police are not usually involved and the STATS 19 data on road accidents does not include them. Within Vision Zero this can no longer be seen as acceptable, given that hospital attendance and admissions records can provide relevant data, and that studies show these injuries constitute half and more of the KSIs of pedestrians. Plus that proportion can be expected to continue to increase as the population ages.

Sweden, where Vision Zero was initiated in 1997, has now (in 2020) set a national target to reduce PFIs by half. A recent study showed that PFIs are the largest group of *all* road users in Sweden and account for almost half of the injuries with long term consequences. PFIs constituted $\frac{3}{4}$ of all pedestrians admitted to hospital and that slippery surfaces and uneven pavements accounted for $\frac{3}{4}$ of all PFIs.

It is highly likely that such PFI serious injuries will have been increasing in Edinburgh alongside the ageing and the deterioration in the condition of the pavements owing to cuts in the maintenance budgets. Without an increase in the maintenance budget that is targeted on eliminating the growing multiplicity of trip hazards on pavements it seems that the incidence of falls and serious injuries to pedestrians will inevitably continue to increase.

In addition there is a huge backlog of improvements needed to rectify the problems faced on pavements that are grossly sub-standard in relation the CEC's Design Guidance. For example the recent cold spell resulting in icy conditions has rendered many driveway exits, with excessive crossfall slopes across the pavements, extremely treacherous, and particularly so for elderly and infirm pedestrians and those negotiating them with buggies or in/with wheelchairs. A programme of investment to eliminate such adverse crossfalls across the city, and ensure that no new ones are still being introduced, should be introduced into the Active Travel Action Plan, alongside the

existing Dropped Kerbs Programme. It should also be included as a vital policy component of the Road Safety Plan.

A similar improvement programme to eliminate the multiplicity of wide-splay junctions across the city is also essential: we strongly welcome the inclusion of measures to address this in the draft Active Travel Action Plan.

Cycling

Many of our comments, especially on reducing traffic speed, will of course make streets safer for cyclists. It is essential that plans include robust action to discourage poor and dangerous driving to protect cyclists as well as pedestrians.

Space should not be shared between cyclists and pedestrians unless there are exceptional circumstances: this designs in conflict between cycling and walking, to everyone's disadvantage.

It would be helpful to both pedestrians and cyclists for more warning to be given of impending interaction, by means of cycles being equipped with and cyclists using bells. For some reason few cycles now seem to have bells and cycles often appear without warning as they overtake pedestrians on shared paths. There should be a commitment in the Road Safety Plan to encourage the renewed fitting and use of bells. This would improve the safety of pedestrians and even more so of cyclists, and would perhaps help to prevent a few cyclists from ending up in the canal!

Living Streets Edinburgh Group

May 2023