



City of Edinburgh 'Road Safety Plan 2020' (February 2010)

Consultation response

Friday 5th March 2010

Part One

The comments in this part, other than those in italics, are to do with difficulties we had in understanding both the tenor and structure of the report. In many places it is obscure except to those who actually compiled the report.

Section 1

The aims of the plan and the intentions of the Council are to be commended.

Section 2

For the sake of clarity there needs to be a subheading "objectives" between the page title and the first paragraph, and a subheading "key priorities" before the paragraph beginning "Edinburgh's key priorities..."

List of objectives and key priorities seems to be a strange mixture. For example, it is difficult to see why tram is selected as an objective: why not mega-trucks? Other items in the list I feel should be taken as read and necessary, and not need to be specified in this list, e.g. partnership working, publicity/promotion, technology. Any scheme should involve these elements.

We feel the objectives should be prioritised, and would suggest this order:

1. User behaviour
2. Speed management
3. Data management and analysis
4. Healthy/active travel

The following should be listed as techniques/methods rather than objectives:

- Partnership working
- Publicity/promotion
- Technology
- Network management

Key priorities

Is listing these in alphabetical order most appropriate? Seven of them refer to specific categories of users, and looking at these it seems to include in fact every kind of user, so why the need to list them? Almost every category seems to be signalled out as being "particularly vulnerable".

It is difficult to make comparison because in some cases absolute numbers of KSI are quoted and in others percentages. For this section to be meaningful like should be compared with like.

Sections 3 & 4

These targets are a step towards vision zero, and probably have to be accepted as a real intermediate target.

Section 5

[accuracy note: on page 9 there is reference to "Cyclists Touring Club" and also "Cycle Touring Club". This is one organisation and both titles given are inaccurate. The actual organisation was called "Cyclists Touring Club", but because it deals with more than just touring is now officially called "CTC".]

The organisations involved in the workshops seem to be representative of a wide range of users, and it is hoped that they will continue to be involved as the plan is developed and implemented.

Section 6

Considering that **User Behaviour** was one of the objectives, there are surprisingly few items of intervention in the driver's section. It also seems strange that while the priority of **Impairment** refers only to disability, in this section on interventions quite a number of things referring to user behaviour appear as Im2. Why is this not in the driver section?

Nowhere in the document as it seemed to be recognised that driving a motor vehicle is a highly specialised skill and something which the average person is probably not well trained for, and almost certainly the skill deteriorates with time. It may become "second nature", but often becomes "second level" to some other activity. Driving should not be accepted as being something that anyone can do or has a right to do. Retraining and retesting should not only be used after cases of very serious accidents but much more regularly and routinely. People who do not have the skills necessary should not be allowed to drive, and as well as retesting there is a need for more severe penalties and pursuit of those who drive without qualification.

Appendix A

Presumably "Only those that received a total score of 3 or more have been included in the Plan" means a score of three in each of the five categories, rather than a total score? Would it have been useful to have included in the previous tables the score which each intervention achieved? What is the refined list of interventions or is the list included in section 6 the refined one? This is not at all clear.

Part Two

Everything in this part is an attempt at an evaluation of the report.

It is not clear how this plan relates to other documents which may or may not yet be in preparation. It is obvious that for the implementation of the interventions outlined in this plan a lot more is needed.

The list of interventions has items labelled as short term, medium term or long term, but it is obvious that not even all the short-term ones can be started immediately (either because of the time needed to prepare or because of the availability of finance). Who is going to be responsible for making the decisions of that next stage of the plan? Will it be the Road Safety Plan Board – and if so, do they actually have a mandate from the people of Edinburgh for that role? Should the stakeholders also be involved in this part of the process?

There is no indication of how the regular updating and bi-annual review is going to take place.

The organisation of action is going to involve a lot of management – first of all is the coordination of the large number of bodies involved in the further consultation of the details of interventions. This will need to be

followed by the development of a schedule for the interventions, in many cases the procurement of contractors and the management of their contracts. Who will this management team be, who will appoint them and who will they be answerable to?

This raises the question of funding – where will the funds come from?

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Transform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns.

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