

# Department for Transport's Cycling Delivery Plan

## Consultation Response from the Mayor of London

- The Mayor and Transport for London (TfL) welcome the Government's commitment to "delivering a step change in cycling" and the expectation in the Cycling Delivery Plan that local authorities must "take steps to cycle-proof their local roads" and "improve safety for cyclists and pedestrians."
- In London, TfL has for some time been seeking DfT approval for a number of regulatory changes which would allow us further to cycle-proof our roads and improve safety. We welcome changes in the new edition of TSRGD which will allow us to sign and signal cycle routes more effectively. However, we also have a number of outstanding requests, of which the most important are:
  - To create a "commencement order" to decriminalise cycle lane infringement, giving TfL the capability to enforce mandatory cycle lanes more effectively. Currently, this work can only be done by the police, who understandably have many other calls on their time. Allowing TfL to enforce bus lanes has substantially increased enforcement and compliance; we anticipate that the same would occur if TfL were allowed to enforce mandatory cycle lanes.
  - To create a specific civil offence for the infringement of an advanced stop line by motorised traffic when the signal is red (by amending schedule 7 of the Traffic Management Act 2004, section 36 of the Road Traffic Act 1998 and TSRGD 2002.) Advanced stop lines, if more widely observed, could prevent large numbers of serious cyclist injuries and deaths, especially straight-ahead cyclists being hit by left-turning traffic. However, enforcement and compliance is again very patchy.
- Apart from funding and leadership, the most important thing the Government can do to promote cycling is regulatory change. We very much hope that the DfT can move forward on these requests.
- Please find attached Annex 1 which provides further consideration of the draft DfT Plan.

## **Annex 1: Cycling Delivery Plan Informal Consultation**

### **Response from the Mayor of London**

#### Introduction

- The Mayor and his transport authority, Transport for London (TfL) welcome the publication of DfT's draft Cycling Delivery Plan and the opportunity to help develop it. London has seen the benefit of setting high-level targets to galvanise action and therefore it is particularly pleasing to see an aspiration to set national targets for improving infrastructure and increasing levels of walking and cycling.
- The Mayor supports the principle of considering walking and cycling together in one strategy in order to build a stronger case for investing in and prioritising active modes of transport. In London the Mayor's £913m investment in cycling will deliver better spaces and places for everyone in London, including pedestrians.
- Walking and cycling should become the natural choices for shorter journeys, or as part of a longer journey, regardless of age, gender, fitness level or income. This closely reflects the commitments that have been made in London through *The Mayor's Vision for Cycling*, published in March 2013, and through TfL's transport health action plan, *Improving the Health of Londoners*, published in February 2014.
- Having experience of the benefits of working in collaboration, TfL fully backs the partnerships between DfT and local councils, and would like to participate in these to support and encourage the implementation of DfT's plan.
- London offers experience in planning and implementing improvements for pedestrians and cyclists to encourage greater uptake of cycling. TfL would be happy to work closely with DfT to strengthen the targets for both walking and cycling, and share lessons learnt in tackling the complexity of delivering growth in these two modes. Initial comments and recommendations on the draft Plan are below, and TfL would be happy to discuss these further with DfT.

#### Headline recommendations

- The Plan acknowledges in Section 1.2 that 'it is natural to extend the cycling commitment to walking'. It has certainly been the experience in London that changes to improve cycling or walking can improve facilities for both groups and lead to general public realm improvements. However, the Plan's title does not include the word 'walking', which could undermine this important message.
- In fact, there is a heavy emphasis on cycling throughout the document. A word search reveals cycling is mentioned over double the number of times of walking. This risks walking appearing to be an afterthought, and could risk antagonising tensions between different road users.
- In extending the Government's commitment to cycling to include walking there is an opportunity to address how cycling infrastructure can help to promote more walking by creating better places for all. For example, TfL's Cycling and Pedestrian Design Guidance complement one another in promoting good design for both groups.

## Specific Comments and Recommendations

- TfL has recently published its Cycle Safety Action Plan which contains 33 new actions that TfL, the police, London boroughs and all organisations involved in making cycling safer will work together to deliver between now and 2020.
- In developing this, much research and data has been collected that could support activities by local authorities across England and Wales, and TfL would encourage DfT to disseminate these as far as possible. In *Safe Streets for London*, London's Road Safety Action Plan, an ambitious target for a 40 per cent reduction in KSI casualties was set.

**Recommendation 1: DfT should ensure that walking and cycling have an equal focus in the Plan. As a starting point, 'walking' should be added to the Plan's title.**

**Recommendation 2: A comprehensive, detailed list of actions should be developed, making clear where the distinctions and alignments are between walking and cycling.**

**Recommendation 3: The Plan should highlight how improved cycling facilities can also benefit walking and that complementary measures can be introduced through cycle proofing ambitions, particularly relevant in Section 3.2.**

**Recommendation 4: The Plan should set an ambitious target to improve cycle and pedestrian safety in order to strengthen the plan and focus local authorities on road safety improvements that prioritise vulnerable road users.**

- The target to increase cycling journey stages to double their 2013 levels is welcome. This could potentially be more ambitious, for example matching the target set in the Cycling APPG's report *Get Britain Cycling*, which set a 10 per cent mode share target.
- The walking ambition is only focused on a sub-group of children (aged between 5 and 10 years old) on one specific journey. If this relatively modest target increase of 7 per cent is achieved, then in 10 years' time 45 per cent of primary school children will still not be walking to school. This focus could also mean there is no change in the low levels of walking of all other groups in society.

**Recommendation 5: Both walking and cycling should have overarching targets to increase journey stages. Sub-targets should be developed to focus activity on improvements to key areas where changes would be beneficial such as addressing different demographics (e.g. children, women), trip type (e.g. the journey to school), spend per capita (as set out in Section 2.1 for cycling) and safety (Section 4 currently cycling only).**

- The plan sets out a vision to increase levels of cycling and walking and introduces the sound benefits on congestion, health and environment, which align with the Mayor's views on walking and cycling. The health impacts will be of particular interest to local authorities given their new responsibilities for improving public health as set out in the Health and Social Care Act which came into force last year. For example, it would be appropriate to apply the World Health Organisation 'HEAT' tool for walking and cycling to show how this plan will deliver against the national physical activity target.

- The important role of public transport in relation to walking and cycling does not appear to have been raised. In London half of all walking is as part of public transport trips, so public transport makes a significant contribution to walking levels. The incorporation of walking and cycling trip stages into longer journeys by public transport is an important consideration in delivering the walking and cycling ambition set out in the Plan.
- The draft Plan references the recommendations set out in recent policy documents: *Get Britain Cycling*; *Tackling Physical Inactivity: A Coordinated Approach*; and *Moving More, Living More* but does not identify any specific outcomes sought.

**Recommendation 6: The Plan should quantify how it will deliver health benefits to communities and increases in physical activity.**

**Recommendation 7: The Plan should highlight the relationship with public transport and include actions on integrating transport modes.**

- Section 1.3 of the draft Plan sets out action and funding to date on cycling, but there is no mention of walking actions and related funding.

**Recommendation 8: Existing walking actions and funding should be highlighted in the Plan, in order to set baseline.**

- TfL supports the idea of local authorities developing their own local walking and cycling delivery plans. However, it is not clear what role strategic transport authorities like TfL, and overarching strategies such as the *Mayor's Transport Strategy*, are expected to have. It would be helpful for DfT to clarify its position on this.

**Recommendation 9: The Plan should set out the role of strategic transport authorities and strategies more explicitly.**

- It is welcome that local authorities must “demonstrate that their walking and cycling plans include steps to meet the needs of people from hard to reach groups – including disabled people, older people and others - where those needs are different from the needs of other people”. However, there are a range of different needs and environments that need to be considered.

**Recommendation 10: The Plan should set out that that plans and infrastructure should not only address the needs of different user groups but also different types of street (as TfL has with the Roads Task Force) and different kinds of bikes (adapted cycles/hand cycles/tricycles).**

- Increases in funding for cycling and walking are very welcome. The national level of funding does not yet compare to the level of investment being made in London or in other European cities, which have had considerable success in creating attractive environments for walking and cycling.

**Recommendation 11: Authorities should be encouraged to coordinate and collaborate, and involve strategic transport authorities, to maximise the benefits of this funding.**

- It is positive that land use planning (included in Theme 3) is recognised as an area where opportunities exist to improve cycle infrastructure provision. However, the draft Plan is not sufficiently specific about what changes can or will take place. The involvement of DCLG is essential for ensuring that any commitment in this area is meaningful. The idea that places should be planned from the outset to be accessible, appropriate and welcoming to cycling and walking needs to be firmly embedded in planning, particularly when it comes to growth areas and areas of major redevelopment.

**Recommendation 12: There should be more emphasis on the creation of joined-up networks to allow for safer, more comfortable and more direct journeys in urban areas by walking and cycling. There should be a particular focus on connecting schools and other places of education to those networks.**

- TfL has been working to improve safety and perceptions of safety on London's roads in relation to freight and fleet vehicles. DfT should also consider what changes to regulations could be made to improve perception of safety and actual safety of vulnerable road users, such as:
  - Safer lorries with side guards and high direct vision cabs.
  - Driver training to improve the emphasis on watching for all road users, not just other cars.
  - Guidance to police and magistrates needs to consider the best way to enforce against and deal with cyclists committing Road Traffic Offences as well as other road users.

**Recommendation 13: The Plan should include actions to improve safety and perceptions of safety on roads in relation to freight and fleet vehicles.**

- TfL supports and contributes to approaches to share best practice, such as the Cycle Proofing Working Group. While TfL remains committed to such groups, it would be beneficial if this approach were extended to pedestrian-proofing. TfL has a suite of guidance documents (which are currently being updated) that set out best practice guidelines and standards for designing infrastructure for walking, cycling and the public realm, which could feed into this work. TfL's London Cycling Design Standards, Pedestrian Design Guidance, Streetscape Guidance provide information on how TfL addresses the interactions and conflicts between walking and cycling, and other road users and TfL would be happy to share this guidance.
- Similarly, there is a heavy focus on cycle safety, which we strongly support as a key goal. However, there is little reference to pedestrian safety and how it can be tackled. Again, TfL has considerable learning to share on this topic: the total number KSI casualties on London's roads fell by 23 per cent in 2013 compared to 2012 and has fallen to the lowest levels since records began.

**Recommendation 14: There should be more focus on walking and pedestrian proofing and DfT should encourage and facilitate sharing best practice.**

**Recommendation 15: Pedestrian safety should also be addressed in the Plan.**

- The Plan notes there are a range of experiential factors that influence people's choices to walk and cycle, including noise, air pollution, perceived safety and intimidation. TfL has developed an holistic assessment of street environments which is applicable to all street types.

- This is called the 'healthy streets approach' and TfL would be happy to discuss how it could be of use to DfT and local authorities across the country in effectively targeting resources.

**Recommendation 16: DfT should discuss with TfL how the healthy streets approach can support this plan.**