

TfL's Road Safety Unit
Email: STEngagement@tfl.gov.uk

Contact: Jorgina Cuixart
Direct line: 020 7934 9829

Email: jorgina.cuixart@londoncouncils.gov.uk
Date: 25 July 2014

Dear Sir / Madam,

TFL CONSULTATION ON THE DRAFT CYCLE SAFETY ACTION PLAN – LONDON COUNCILS' RESPONSE

London Councils is committed to fighting for resources for London and getting the best possible deal for London's 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

As a member of the Road Safety Steering Group and the Cycle Safety Working Group, London Councils largely welcomes TfL's consultation on the draft Cycle Safety Action Plan and the work that is being done through these groups to ensure boroughs and other stakeholders are fully involved in securing the safety of London's most vulnerable road users.

Our response has been developed following consultation with London boroughs. It provides general comments on the overall aim of the Plan and specific comments on the text, figures and actions.

Yours sincerely,

A handwritten signature in black ink that reads "Julian Bell". The signature is fluid and cursive, with a long horizontal stroke underneath.

Cllr Julian Bell

Chair of the London Councils' Transport and Environment Committee

TfL's consultation on the Draft Cycle Safety Action Plan

London Councils' draft submission

1. Introduction

London boroughs largely welcome the clear ambition to improve cycle safety and the broad range of initiatives that are set out within the Cycle Safety Action Plan ('the Plan') to achieve this. Measures to improve cycle safety need to be seen in the context of a balanced package of measures and programmes for highways and the public realm that address the requirements of the entire community.

In particular, London boroughs welcome the focus on improving safety of cyclists and Heavy Goods Vehicles (HGVs), especially the work being undertaken in conjunction with London Councils on the Safer Lorry Scheme. Whilst this is crucial to protect London's cyclists, the Plan should include more actions targeted to other road users, in particular cars which make up the majority of cyclists killed or seriously injured (KSI). Other issues London Councils would like TfL to consider are:

- Adopting a more proactive engineering programme which entails broader improvements to the cycling environment stimulating safer cycling in areas which currently do not have a lot of people cycling.
- Clarifying what support will be provided by TfL to implement 20mph schemes and enforce them, for example through CCTV.
- Including an additional action under 'Greater communication, skills and training for cyclists' to improve the safety of BAME (Black, Asian and Minority Ethnic) cyclists.
- Lobbying for a change in the Highway Code to have a hierarchy of priority to different road users beginning with pedestrians, then cyclists and finally motorised vehicles.

Detailed responses on the overall aim of the Plan, draft text, figures and actions are provided below.

2. General comments

- Whilst the Plan provides very useful information on cyclists' casualties and risks, it should expand on the main causes of danger or the road users (and their vehicles) who pose the biggest threat to others. So, for example, pedestrians and cyclists, pose no or very little threat to other vehicles when compared with the weight and speed of motorised vehicles. The Plan should clearly embed the principles of a road danger reduction approach.
- Also, the risk assessment focuses on STATS19 data which may mask locations that are so dangerous that cyclists avoid them. By ignoring these locations the physical barriers presented by major roads might be ignored, which in turn reduces the cohesion of the network and discourages cycling. Whilst it might still be appropriate to use STATS19 data, a broader assessment should also be made bearing in mind the need to encourage cycling, as well as making it safer.

- The plan does not include any reference to motorbikes in bus lanes as there seems to be an inconsistency across London as to whether they can or cannot use bus lanes. Cyclists are generally opposed to their use by motorbikes. London boroughs would welcome TfL guidance on this so practices can be standardised across London.
- Finally, prior to public consultation, TfL should have consulted with boroughs on some of the information included in the Plan which relates to individual boroughs (e.g. Figure 4, on page 10, which is discussed in more detail in the section below). Also, this consultation, and the accompanying consultation on the draft London Cycling Design Standards, should have remained open for longer than a month as boroughs find it challenging, from a resource perspective, to respond to both adequately, especially as the latter is very technically detailed. Further, given the consultation was issued in the midst of the political cycle, it would have been useful to have had more time to engage newly elected Members

3. Comments on figures and draft text:

- Figure 2 - 'International cycling fatalities per million population' is misleading and does not offer a fair comparison between cities. The metric 'per million population' is not appropriate as it does not take into account how big a city is and the number of people that cycle in each city. For example, the graph shows that Amsterdam has a high fatality rate compared to London, but this is because Amsterdam is seven times smaller than London, in population terms, but in comparison it has many more people who cycle regularly. Recasting the metrics to present the risks 'per kilometre travelled' or 'per number of daily cyclists' would be more appropriate.
- Table 1 - 'Ratio of cyclist KSI injury & collision involvement by mode share (2010-12)' indicates that taxis and private hire vehicles (TPH) have the highest ratio (4.0) of cyclist KSI collision involvement compared to other vehicles. This is not particularly reflected in the draft text or the actions. The text accompanying this figure should explain the underlying causes behind the high ratio of TPH involvement in cyclist collisions and given TfL's control over this industry, and the actions to trial ISA/RIBS systems on buses and lorries, the Plan should include a specific action regarding TPH vehicle technologies.
- Also, on the text accompanying Table 1, there is little information about the causes for a high number of cycling KSIs which involve cars. The fact that three-quarters of all cyclist KSI collisions involved cars is significant and should be better reflected within the Plan. Following the road danger reduction approach mentioned above, the Plan should include actions which encourage people to walk and cycle more as opposed to using motorised forms of travel. This is captured to some extent in the 'designing safe streets for cycling' set of actions but needs to be more firmly embedded in the text.
- Figure 4 – 'Cyclist KSI casualty rate per billion kilometres by borough' is not appropriate and should be removed. The data on which the graph is based, April 2008 – March 2011, is out of date and the metrics used - 'KSI rate per billion km travelled' - are not clear and TfL should explain how these have been calculated. Also, the footnote indicates that there is an uncertainty of +/- 25 and that apparent

differences may not be statistically significant. If the variations shown in the graph are not significant, the graph does not serve its purpose.

- On page 14, an additional bullet point should be added stating 'working with the Police on campaigns to deal with bad driving and cycling'
- On pages 15-16, under the section 'Cycle conflicts: why?' the action plan should refer to international best practice on safety rules included in traffic laws/codes to protect cyclists (see our comments under Action 19).

4. Comments on the Actions:

Action	London Councils' comments
<p>1. Together with London boroughs, TfL will deliver the major infrastructure programmes of the Mayor's Vision for Cycling in London emphasising the importance of cycle safety on the TLRN and borough roads. This includes implementing:</p> <ul style="list-style-type: none"> • at least 50 per cent of the Central London Grid by 2016 and Quietways, achieving a safe and connected network for cycling • new Cycle Superhighways and upgrading the existing Cycle Superhighway routes • three mini-Holland schemes in the London Boroughs of Enfield and Waltham Forest, and Royal Borough of Kingston upon Thames • 33 Better Junctions to create a step-change in cycle and pedestrian safety at key junctions. Ten schemes will be delivered by 2016. 	<ul style="list-style-type: none"> • This action states that at least 50 per cent of Quietways will be complete by 2016. However, it is not clear if it refers to 50 per cent of the routes, or of the first eight prioritised routes or in kms. This action should also specify when the remaining Quietways will be delivered beyond 2016. • It is stated that the new Cycle Superhighways (CSH) and upgrading of existing ones will be 'complete' by 2016. However there are some Cycle Superhighways which are planned to commence in 2017/18. This action should therefore refer to the short-term plans as well as the continuation of the CSH programme beyond 2016. • This action should list the ten junction schemes that will be delivered by 2016. TfL should provide details on their prioritisation criteria and also consider the feasibility of developing temporary/emergency safety actions that protect cyclists and pedestrians the most problematic junctions, before these can be entirely re-developed.
<p>2. TfL will publish the London Cycling Design Standards (LCDS) to deliver world class cycle designs on the TLRN and require the application of the standards in all</p>	<ul style="list-style-type: none"> • TfL should ensure that the Pedestrian Safety Design Guidance, currently being developed by TfL, is fully coherent with the LCDS and do not conflict with each other:

<p>schemes, including those on borough roads through the Local Implementation Plan (LIP) programme.</p>	<ul style="list-style-type: none"> ○ Borough transport planners should not face the dilemma of not knowing what principles apply, whether the ones from the Cycling Standards or the ones from the Pedestrians Guidance. To this end, both guides should be complementary and cross-referenced. TfL should also give some consideration as how to ensure this continuity after initial release so that any amendments or updates made over time still have a clear linkage. ○ Potential conflicts between the two transport modes (pedestrians and cyclists) should be clearly identified and acknowledged in any designs so that the appropriate balance can be sought by those applying both guidance documents. • TfL should also ensure both the Pedestrian Design Guidance and the LCDS are presented to boroughs jointly and in a coherent manner.
<p>3. TfL will support and encourage best practice application of the LCDS on the TLRN and borough roads through offering continued professional development training for TfL and borough engineers, scheme designers and auditors.</p>	<ul style="list-style-type: none"> • London boroughs welcome the offer from TfL of professional development training for borough engineers, given that boroughs individual training budgets are currently strained.
<p>4. TfL will focus its road safety engineering programme on locations on the Transport for London Road Network (TLRN) where vulnerable road users can be made safer. London boroughs will be strongly encouraged to prioritise cycle safety through the three-yearly Local Implementation Plan (LIP) programmes and by publishing annual borough hotspot maps.</p>	<ul style="list-style-type: none"> • London boroughs agree to prioritise hotspots. However, in the first instance the preferred option should be to make places safer for cycling by encouraging mode shift, reducing speed and improving behaviour and tolerance between road users. More emphasis should be put on reducing the risk of a collision happening as opposed to reducing its severity. • Also some consideration should be given to improving certain junctions or links in outer London where cycling is currently very low

	<p>due to the nature of the road network itself which is suppressing cycling in the first instance. A more proactive engineering programme which entails broader improvements to the cycling environment would stimulate safer cycling in areas which currently do not have a lot of people cycling.</p> <ul style="list-style-type: none"> • TfL should make clear that prioritising cycle safety through the three-yearly Local Implementation Plan (LIP) programmes should not cause conflict with the actions included in the Pedestrian Safety Action Plan aimed at improving pedestrian safety.
<p>5. TfL, alongside the City of London, will trial 20mph speed limits on two stretches of the TLRN in the City of London, including London Bridge and Blackfriars Bridge, to create safer and more attractive environments for cycling. The trials will be closely monitored to help understand the potential of 20mph limits at other locations on the TLRN. TfL will also continue to encourage London boroughs to deliver more 20mph schemes through their LIP programmes.</p>	<ul style="list-style-type: none"> • As mentioned in our response to the Pedestrian Safety Action Plan, this action should aim at continuing expanding 20mph on the TLRN, where appropriate. This action should align with the categorisation of lengths of the TLRN under the Roads Task Force where these are high streets and high roads in town centres. • A number of boroughs have adopted, or are in the process of adopting, borough-wide 20mph speed limits and many others have created more 20mph zones. However, borough efforts to encourage speed reduction will only work if appropriate enforcement regimes are in place. London Councils would like greater clarification on what support will be provided by TfL to implement 20mph schemes and enforce them, for example through CCTV. • TfL should also acknowledge that the boroughs' core LIP programme funding has the flexibility to be spent within the parameters and priorities set out in the Mayor's Transport Strategy. Therefore, for some boroughs delivering more 20mph schemes may not be as important as other Mayoral priorities such as other cycling measures or smoothing traffic flows. This action should therefore read as: '<i>TfL will</i>

	<i>seek to support those boroughs looking to deliver more 20mph schemes...'</i>
6. TfL will improve the comfort and safety of popular cycling routes on the TLRN by inspecting them more often and maintaining them to higher standards.	<ul style="list-style-type: none"> The timeline for this action should be 'on-going' rather than 2015.
7. For the first time, TfL will publish planned and emergency diversion routes which take cyclists along the safest and most direct routes when usual routes are unavailable, and will seek to keep routes open for cyclists unless space constraints or safety are compromised.	<ul style="list-style-type: none"> Also in reference to Action 6, TfL should consider appropriately accommodating works in cycle lanes or on the nearside of roads more generally – particularly contra flow routes where street works might force cyclists into oncoming traffic.
<p>10. TfL will work with the freight, fleet and construction logistics industries to target an improvement in vehicle and driver safety standards by:</p> <ul style="list-style-type: none"> holding supplier seminars to stimulate the development of innovative vehicle safety technology encouraging and supporting small fleet operators to become accredited with the Fleet Operator Recognition Scheme (FORS) encouraging the uptake and retrofit of effective vehicle safety technology on all existing lorries increasing the uptake of FORS, particularly in the GLA family, London boroughs, the wider public sector and their suppliers. 	<ul style="list-style-type: none"> Many London boroughs have taken steps towards getting the council's own and/or sub-contracted vehicles fleet accredited with FORS. Challenges remain in terms of staff resourcing, both in highways departments and in the procurement/fleet management teams, both needed to oversee the application of FORS. In order to advance the implementation of the FORS programme, TfL should clearly explain what improvements are to be made to this initiative in years to come. TfL should also provide details on how they plan to 'encourage and support small fleet operators to become [FORS] accredited'.
Section on 'Improving driver standards and awareness of cycling' (Actions 15- 19)	<ul style="list-style-type: none"> This section should have its own target about car driver behaviour. This could build on the DVSA target and include more on education and promotion of safer driving

	practices.
<p>19. TfL will lobby the DfT to emphasise the prominence of cycling and the safety of cyclists and other vulnerable road users by identifying improvements in the Highway Code and better aligning it with advice from National Standards (Bikeability) training.</p>	<ul style="list-style-type: none"> • Discussions on improvements to the Highway Code based on Bikeability standards should include liaison with borough cycle instructors who are delivering cycle training. • London boroughs would like to see a change in the Highway Code to have a hierarchy of priority to different road users beginning with pedestrians, then cyclists and finally motorised vehicles. With this hierarchy, cyclists and motorised vehicles give way to pedestrians and motorised vehicles give way to cyclists. Holland and other European countries have this enshrined in their Highway codes. • TfL should also lobby DfT to change the Highway Code to introduce safer passing distances when drivers overtake cyclists. Several US states have introduced laws that require drivers to leave a distance of at least three feet when overtaking a cyclist. In Europe, minimum passing distances have been set in a number of countries.
<p>21. In partnership with the MPS and CoLP, TfL will double the number of Exchanging Places events aimed at cyclists to 100 per year by:</p> <ul style="list-style-type: none"> • delivering at least one event per month with London Buses • holding Exchanging Places events alongside commercial vehicle enforcement to promote a balanced approach to enforcement and road user safety • running pop-up Exchanging Places and cycle safety events • investigating introducing events at schools and workplaces • considering conducting a touring event of major town centres 	<ul style="list-style-type: none"> • TfL should consider introducing Exchanging Places events at Universities and professional colleges, in addition to schools and workplaces. Many university students and staff are within the highest casualty age band (25-39 years). Many of them might not be originally from London or the UK, therefore the importance of raising awareness of the risks of cycling in London and promoting road user safety. • London Councils particularly welcomes the idea of touring events at major town centres across London. Such events should reach town centres in outer London as well as in inner London, contributing to the local vitality of London's high streets.

across London.	
<p>Additional action under 'Greater communication, skills and training for cyclists' to improve the safety of BAME (Black, Asian and Minority Ethnic) cyclists</p>	<ul style="list-style-type: none"> On pages 12-13, the draft plan states that BAME cyclists experience approximately twice the risk of non-BAME cyclists and that further understanding of the risk inequality among BAME cyclists and the role of social deprivation on cycle risk is required. However, the action plan has not identified any action targeted to BAME road users. TfL should include at least one action to work with BAME communities, especially as the perception of cycle safety and the adoption of cycling varies depending on the different ethnic population and background. All actions that have been identified in the draft Plan should take this into account and where necessary modified to suit the local population needs. Harrow Council, where 50.1% of the people living in the borough are from minority ethnic groups, would be interested in trialling ethnic group specific actions.
<p>26. TfL will develop and launch campaigns to change behaviour among all road users to make cycling safer by sharing roadscape, and:</p> <ul style="list-style-type: none"> further developing the cycle safety tips campaign to ensure effective targeting of key messages providing clarity to cyclists and drivers on the use of new cycling infrastructure creating opportunities to raise awareness of cycle safety through all forms of media. 	<ul style="list-style-type: none"> London boroughs would benefit from advanced information on any road safety campaigns so that local engagement activities can be organised alongside the pan-London campaigns. Past experiences show that local engagement can amplify the impact of the campaign across London. Informing boroughs of any planned road safety campaigns will potentially save on work being duplicated later on. Campaigns should be developed in partnership with the boroughs in order to carry forward TfL's commitment to do more work with the boroughs. Also, on the second bullet point, it is important to provide clarity to cyclists on the use of existing infrastructure as well as new infrastructure.
32. TfL will continue to build an	<ul style="list-style-type: none"> TfL should undertake research to develop a

<p>evidence base by undertaking further research to understand and improve its knowledge of cycle safety, particularly in the following areas:</p> <ul style="list-style-type: none"> • Cyclist fatalities • Serious injury collisions • Cyclists and their bicycles • Other vehicles and their drivers • The law • Infrastructure • Casualty trends and risk. 	<p>more comprehensive understanding of the numbers of people cycling, without which, casualty rates can be misleading. This is particularly important at borough level, as well as pan-London statistics.</p> <ul style="list-style-type: none"> • As mentioned above, the draft plan states that further understanding of the risk inequality among BAME cyclists and the role of social deprivation on cycle risk is required. This action should specifically address this research gap.
---	--