

The Department for Transport's call for evidence on
The Future of Mobility
Response from Cycling UK

INTRODUCTION

About Cycling UK

Cycling UK was founded in 1878 and has 65,000 members and supporters. Our central mission is to make cycling a safe, accessible, enjoyable and 'normal' activity for people of all ages and abilities. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits, both for individuals and society. Our activities include representing the interests of current and would-be cyclists on public policy matters, and running practical projects to enable people of all ages, backgrounds and abilities to experience the benefits of cycling.

Key recommendations

1. Funding

- Devote a greater proportion of total transport spending to cycling and other forms of clean and healthy transport. The Government's Cycling and Walking Investment Strategy (CWIS) should increase initially to 5% of total transport spending at the start of the next spending round (2020/21), rising to 10% over the next 5 years.
- Specific funding should be available:
 - (i) to support local authorities in delivering their Local Cycling and Walking Implementation Plans (LCWIPs);
 - (ii) to support the provision of 'Bikeability' cycle training for people of all ages;
 - (iii) for behaviour change programmes to promote cycling in schools, workplaces and in a range of community settings to increase cycle use among those who are under-represented in cycling (e.g. women, older people, health patients, people with disabilities and other disadvantaged groups); and
 - (iv) to support the uptake of electrically assisted pedal cycles (or e-bikes) both for personal travel and for local freight deliveries (see also point 3).
- Support local authorities in introducing local charging schemes to tackle congestion and pollution, with the revenues earmarked for clean and healthy transport.

2. Cycle-friendly roads, streets, junctions and new developments

- Support the planning and development of comprehensive local cycling networks, enabling people of all ages and abilities to make any local journey safely and conveniently by cycling.
- These networks should comprise:
 - (i) protected cycle lanes on or alongside faster or busier main roads;
 - (ii) local streets and lanes with low traffic volumes and speeds; and
 - (iii) off-road cycling routes (e.g. through parks and open spaces).
- Adopt new rules to give greater safety and priority for walking and cycling at junctions.
- High quality secure cycle parking should be widely available to meet the needs of different users at different location types.

- Ensure that DfT’s forthcoming new cycle-friendly design guidance, incorporating the above principles, is consistently applied in all road and traffic schemes, new developments and planned road maintenance work.

3. Alternatives to cars, vans and lorries

- Support the uptake of electrically assisted pedal cycles (or ‘e-bikes’) as alternatives to the car, particularly for journeys that are longer or hillier than people would otherwise be happy to cycle, and for people who would otherwise be deterred from cycling due to their age, health conditions or disabilities.
- Support the uptake of cargo bikes (including those with electric assistance) as a solution for smaller local deliveries, together with trans-shipment depots to reduce the use of lorries on local streets in built-up areas.
- Support the integration of cycling and public transport, and the complementary development of hire-bike schemes.

4. Other safety measures

- Improve cycle safety by influencing driver behaviour, through a combination of awareness campaigns, changes to the Highway Code and the driving test, and strengthened road traffic law and enforcement.
- Reduce the threat to cyclists and pedestrians from heavy goods vehicles, by establishing national standards for lorry operators, drivers and the vehicles themselves (particularly the design of their cabs), and by reducing their use on urban streets.

RESPONSES TO CONSULTATION QUESTIONS: PART 1

The Future of Urban Mobility Strategy

Q1: We have identified above the main technologies and trends that we believe will affect urban mobility in the coming decades. Are there any missing?

The call-for-evidence rightly notes that van traffic is increasing. Moreover DfT predicts future growth of 79-115% by 2040 based on 2010 levels.¹ If left unchecked, this trend could easily negate the opportunities provided by more positive developments (e.g. the decline in car use and driver licencing among young people, and the possible opportunities provided by connected and autonomous vehicles) to free up roadspace and improve road safety.

Action must be taken to reverse this trend, if we are to maximise the opportunities for safer and less congested streets, cleaner air, increased physical activity and more vibrant town centres and communities. See our responses to questions 9 (point (b)) and 11.

The call-for-evidence also notes that “The impacts of automated vehicles on road network demand and performance are uncertain”. Action is needed to ensure that AVs deliver road safety improvements and greater access to transport, particularly for those who cannot drive, without causing an increase in overall ownership and use of motor vehicles. See point (a) in our response to question 12.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/709047/tra9905.ods

Q2: We want our urban infrastructure to support these trends and deliver benefits to society. What changes are required to urban infrastructure?

We have five recommendations:

- a) *Support the planning and development of comprehensive local cycling networks, enabling people of all ages and abilities to make any local journey safely and conveniently by cycling.*

Cycling UK strongly supports the Local Cycling and Walking Infrastructure Plan (LCWIP) process which DfT has invited non-London highways authorities in England to follow. However there is no clear funding source to support those who do so in implementing their plans. This must be rectified at the earliest opportunity.

We also urge the Government to require highway authorities to prepare LCWIPs, rather than merely encouraging them to do so. As a minimum, LCWIPs should be required in Clean Air Zone areas.

- b) *Local cycle networks should comprise (i) protected cycle lanes on or alongside faster or busier main roads; (ii) local streets and lanes with low traffic volumes and speeds; and (iii) off-road cycling routes (e.g. through parks and open spaces).*

The principles of good cycle planning and design have been set out in guidance issued by Transport for London (its London Cycling Design Standards²), the Welsh Government (its Active Travel Act Design Guidance³) and Highways England (its Interim Advice Note IAN 195/16 'Cycle traffic and the Strategic Road Network'⁴). Cycling UK has produced a booklet, 'Space for Cycling: a guide for decision-makers',⁵ which provides a concise visually-appealing summary of these principles.

We are pleased that the Government has now commissioned cycle-friendly guidance for the rest of England and is optimistic that it too will enshrine these same principles. We look forward to its publication, which is due by the end of this year.

The challenge then will be to ensure its consistent application – see point (e) below.

- c) *Adopt new rules to give greater safety and priority for walking and cycling at junctions.*

Cycling UK strongly supports British Cycling's 'Turning the Corner' campaign for new rules that would improve pedestrian as well as cycle safety and priority at both signalised and unsignalised junctions.⁶ In essence, we wish to see the adoption of a rule under which turning traffic should normally give way to pedestrians or cycle users going straight ahead across their path, unless signals indicate otherwise. This could not only make it much simpler and safer for UK highway authorities to introduce high-quality protected cycle lanes (this is still very difficult under current UK rules), but could also improve the efficiency and capacity of signalised junctions for motor vehicles too.

² <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>.

³ <https://gov.wales/docs/det/publications/141209-active-travel-design-guidance-en.pdf>.

⁴ www.standardsforhighways.co.uk/ha/standards/ians/pdfs/ian195.pdf.

⁵ www.cyclinguk.org/sites/default/files/document/2017/10/space_for_cycling_guide_for_decision_makers.pdf.

⁶ www.britishcycling.org.uk/campaigning/article/20161220-campaigning-Turning-the-Corner-author-explains-campaign-s-aims-0.

- d) *High quality secure cycle parking should be widely available to meet the needs of different users at different location types.*

High quality secure cycle parking should be widely available to meet the needs of different users at different location types (e.g. residents, employees, visitors, public transport users etc).

We anticipate that DfT's forthcoming guidance on cycle-friendly planning and design will include guidance on the appropriate quantity, design and placement of cycle parking at different types of location (residential, retail, employment, public transport interchanges), in urban and rural areas alike. In the meantime we recommend the advice provided in Chapter 8 of Transport for London's London Cycling Design Standards⁷ and Chapter 8 of the Welsh Government's Active Travel Act design guidance.⁸

- e) *Ensure that DfT's forthcoming new cycle-friendly design guidance, incorporating the principles from points a) to d) above, is consistently applied in all road and traffic schemes, new developments and planned road maintenance work.*

As noted earlier (see point (b) above), Cycling UK looks forward to the publication of DfT promised new cycling infrastructure guidance. The challenge then will be to ensure it is consistently implemented, not just when building dedicated cycling infrastructure but in all highway and traffic schemes, all new developments (including the many housing developments expected in the coming years) and when planned road resurfacing takes place. The latter is a highly cost-effective opportunity to make improvements to the cycle-friendliness of road and junction layouts.

To maximise these opportunities, the principles of the new design guidance will also need to be incorporated into other relevant documents, e.g. other sections of the Design Manual for Roads and Bridges (DMRB), as well as national and local policy and guidance documents relating to the design and planning of new developments (particularly housing developments). Professional training programmes will also need to be developed, along the lines of that developed by Highways England when it adopted its Interim Advice Note IAN 195/16 'Cycle traffic and the Strategic Road Network'.

Q3: What evidence do you have to enhance our overview of the impacts of these trends on cities and their use of urban space? Are any impacts missing?

In our response to question 1, we noted the risk that the growth of van traffic could offset the potential traffic reduction benefits of a decline in demand for personal travel (particularly among younger people in urban areas) and the advent of CAVs.

Transport for London's evidence shows that, contrary to the views of some politicians and other commentators, TfL's protected 'Cycle Superhighways' are already enabling more people to travel along congested road corridors than was possible before they were introduced⁹.

The EU-funded FLOW project report¹⁰ provides a summary of international evidence of the effectiveness of cycle infrastructure in tackling congestion pressures.

⁷ <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>.

⁸ <https://gov.wales/docs/det/publications/141209-active-travel-design-guidance-en.pdf>.

⁹ <http://foi.tfl.gov.uk/FOI-1235-1718/20170317%20STB%20CSEW%20Journey%20Times%20V1.9%20R.pdf>.

¹⁰ http://h2020-flow.eu/uploads/tx_news/ FLOW REPORT - Portfolio of Measures v 06_web.pdf.

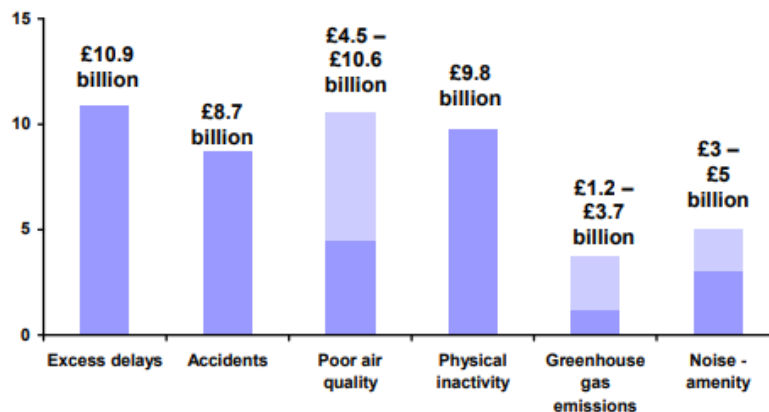
Q4: What possible market failures might emerging technologies and trends give rise to that could require intervention by Government?

Transport has many associated market failures, notably the ‘externalities’ of congestion, pollution, road danger, physical inactivity (which, in terms of transport, is largely a consequence of the actual and perceived dangers which deter people from walking and cycling, or allowing their children to do so) and climate change.

There are also several inequalities issues, notably the way that the burden of pollution¹¹ and road danger^{12 13} falls disproportionately on lower income groups. We discuss inequality-related market failures further in our response to question 5 (below).

The societal costs of congestion, pollution, road danger and physical inactivity were documented in a Cabinet Office Strategy Unit report ‘The wider costs of transport in English urban areas in 2009’¹⁴. In essence, it showed that the economic costs these four externalities were of similar magnitude: each was around £10bn annually.

Comparison of the wider cost of transport in English urban areas (£ billion per annum, 2009 prices and values)



It is for this reason that Cycling UK calls for action to halt and reverse the growth of road traffic, particularly in urban areas.

Specifically, we advocate the use of charging to tackle urban congestion and pollution. We strongly urge the Government to reconsider its reluctance to support local authorities in introducing charging clean air zones, and instead to insist that charging should only be implemented as a ‘last resort’ – i.e. if compliance with air quality standards cannot be achieved ‘as quickly as possible’ (as required by law) without it. This is irrational. Any package of measures without charging that is effective in reducing pollution levels would achieve reductions more quickly if charging was added to the policy package. Charging was identified in the Government’s own technical assessment as the most effective way to improve air quality rapidly.¹⁵

¹¹ <http://eprints.uwe.ac.uk/28882/7/Barnes%20and%20Chatterton%20%25282016%2529%20An%20environmental%20justice%20analysis%20of%20exposure%20to%20traffic-related%20pollutants%20in%20England%20and%20Wales%20%2528FINAL%2529.pdf>.

¹² <https://injuryprevention.bmj.com/content/11/3/152>.

¹³ www.ncbi.nlm.nih.gov/pubmed/15607283.

¹⁴ <http://webarchive.nationalarchives.gov.uk/+/http://www.cabinetoffice.gov.uk/media/307739/wider-costs-transport.pdf>.

¹⁵ https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Technical%20Report%20%20Amended%209%20May%202017.pdf – see p189.

We therefore believe the Government should be supporting local authorities who wish to implement local road user charging schemes (rather than putting obstacles in their way), with the revenues being earmarked for investment in cycling and other clean and healthy alternatives. There is good evidence of public support for action to reduce motor vehicle use,¹⁶ for investing in cycling,¹⁷ and indeed for road user charging if the public has confidence that this will deliver benefits.¹⁸ The Government should therefore support councils in making the case that the proceeds from CAZs will be used for aims for which there is public support.

Q5: We are committed to a transport network that works for everyone. What role should Government play in helping ensure that future transport technologies and services are developed in an inclusive manner?

We firstly reiterate our calls for (i) protected cycle lanes on or alongside faster or busier main roads and (ii) lower speed limits. We note that:

- Although most people are currently deterred from cycling on Britain's roads, the deterrent effect is particularly strong for children, older people, women and people with disabilities;¹⁹
- The burden of road danger falls disproportionately on people (particularly children) in lower income areas.^{12 13}

We are therefore pleased that the Government has acknowledged the need for its revised Cycle Infrastructure Design guidance to overcome the current road environment's disproportionate deterrent effect on cycle use among 'protected groups' (e.g. women, children, older people and people with disabilities), in accordance with the Public Sector Equality Duty.²⁰

However there are two other measures which we urge Government should take to boost cycle use among groups who are currently under-represented in cycling. These are:

- a) *Provide revenue funding to support community projects to boost cycle use among under-represented groups*

Cycling UK's Big Bike Revival (BBR), Community Clubs and Cycling for Health projects, run with support from DfT, have consistently demonstrated their effectiveness – and cost-effectiveness – in boosting cycle use particularly among groups.

- The *Big Bike Revival* (www.cyclinguk.org/bigbikerevival) is run in conjunction with local bike-recycling projects and similar social enterprises, with support from DfT. It involves open days where people are encouraged to bring along bikes that have lain unused, which often need a simple fix. They are offered free cycle checks, servicing, cycle

¹⁶ www.gov.uk/government/uploads/system/uploads/attachment_data/file/724824/att0332.ods.

¹⁷ www.sustrans.org.uk/sites/default/files/file_content_type/bike-life-2017-summary-report.pdf.

¹⁸ www.ibtta.org/sites/default/files/unrestricted/win08_Zmud.pdf.

¹⁹ For evidence see www.ncbi.nlm.nih.gov/pmc/articles/PMC5259802/,

<http://content.tfl.gov.uk/understanding-cycle-route-choice.pdf> and

[\[manatee.cloudvent.net/compressed/5ab7ab985c867240c4f1883d77e0fbb1.pdf\]\(http://manatee.cloudvent.net/compressed/5ab7ab985c867240c4f1883d77e0fbb1.pdf\).](http://d1qmdf3vop2i07.cloudfront.net/quaint-</p></div><div data-bbox=)

²⁰ www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-04-13/70558/.

maintenance workshops, cycle training and accompanied rides. 37% of participants in *Big Bike Revival* events in England were non-regular cyclists, almost half were women and 42% were from the top 30% most deprived areas in the country.

- *Community Clubs* (www.cyclinguk.org/community-cycle-clubs) are run in partnership with a wide variety of community groups, whether for women, health patients, people with disabilities or other disadvantaged groups. They offer longer-term support for people interested in taking up cycling, for whatever reason. They can often be formed in the aftermath of a Big Bike Revival project. We have set up over 200 clubs in England and Wales, which have attracted 50,000 participants. Half of them were women, 47% are from the most deprived three deciles of neighbourhoods with 24% coming from most deprived decile. 20% of participants have a disability or long-term health condition and 30% are inactive, meaning they were not doing 30 minutes of exercise per week prior to joining the club.
- Our *Cycling for Health* project (www.cyclinguk.org/community-outreach/health) has been run through 8 'cycling hubs' throughout West Yorkshire, with support from the West Yorkshire Combined Authority. It enables people with inactivity-related physical and mental health conditions to take up cycling as part of a sociable and supportive group. The majority of participants are now referred to the programme by local health professionals. Of the programme's 270 direct beneficiaries, 56% were from recognised areas of deprivation with 31% coming from the highest decile of deprivation. 78% were female and 28% identified as being of non-white ethnicity. 90% were previously non-cyclists, yet 68% were still cycling regularly (i.e. more than once a week) 6 weeks after the programme had ended. Participants said they felt more confident, more relaxed, closer to other people, better able to think clearly and deal with problems, and more optimistic about the future.

Cycling UK believes that revenue-funded behaviour change programmes can provide excellent value for money even in the absence of good cycling infrastructure – though they are a lot more effective if the two go hand-in-hand (see our response to question 7). Recently-published DfT research²¹ demonstrates the impact of the three Sustainable Transport Demonstration Towns programmes (Darlington, Peterborough and Worcester) which focussed almost entirely on revenue-funded behaviour change programmes. Overall these achieved a reduction in total traffic levels in the order of 2% in the three towns, together with a reduction of 7-10% in the number of car driver trips per resident. A cost-benefit analysis, undertaken on a relatively conservative basis and considering congestion benefits only, produced a BCR of 4.5:1.

We further note that boosting cycle use among these under-represented groups could substantially boost the market for cycle manufacturing and retailing, thereby boosting the sector's contribution to the UK economy. For more, see our response to question 8.

b) Support the uptake of electrically assisted pedal cycles (or 'e-bikes') among older people, health patients, people with disabilities and job-seekers from lower income groups in areas of transport deprivation

We make the wider case for Government support for e-bikes in response to questions 10 and 11 below, as part of the Government's Clean Growth and Industrial Strategies. However, in terms of addressing inequality-related market failures, we think there is a

²¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/738305/ppr776-sustainable-travel-towns-final-report.pdf.

particularly strong case for supporting their uptake among the above groups, all of whom are under-represented among the UK's current cycling population.

E-bikes can be particularly effective in boosting cycle use among these groups,²² providing enormous benefits for their health and/or their independent mobility. Projects such as those run by CoMoUK and Pedal Power have demonstrated that 'try-before you buy' e-bike schemes are highly effective at overcoming the obvious barriers to promoting cycling among these groups.^{23 24} Moreover, relatively few people in these groups would be able to benefit from any support for e-bikes that may be provided through the Cycle to Work Scheme.

In order to maximise this benefit, we therefore urge the Government to provide dedicated support the uptake of e-bikes, particularly through community-based 'try-before-you-buy' projects for:

- People with disabilities who would benefit from using them as mobility aids;
- Older people and health patients who had been recommended to take up cycling via an 'exercise on referral' scheme;
- Job seekers in areas of transport deprivation, through 'wheels to work' schemes.

Q6: How can Government ensure that future urban transport systems support people's wellbeing and flourishing, healthy communities?

We have already outlined the need for cycle-friendly road, street and junction layouts in response to question 2, and for local charging schemes in response to question 4.

We also call for improvements to facilitate the integration of cycling and rail (or other public transport), to enable cycling to be used as a non-car option for longer distance journeys – in accordance with the stated aims of the CWIS. These need to include:

- Convenient *cycle access* to, from, within and through stations and interchanges – including wheeling ramps to assist with cycle carriage up and down steps (where a better solution cannot be achieved).
- Ample high-quality *cycle parking and storage* at stations and key interchanges. This should be conveniently located, well-designed, secure and sheltered.
- The provision of some *dedicated space for cycle carriage* on new and refurbished rolling stock – n. b. this includes light rail and tram systems as well as trains. Cycling UK fully accepts that operators may need to restrict the use of this space on busy routes at busy times. However this should not preclude cycle spaces being provided, so that they can be used at quieter times. Signing and other information should be provided on trains and/or on platforms to help people know where to board with their bikes.
- Clear *information* about when and where cycles can and cannot be carried.
- The ability to *reserve cycle spaces* on longer-distance trains (i.e. those for which seat reservations can also be made) in real time. At present, the processes for cycle reservations are very unwieldy.
- Good *integration of local hire-bike schemes with the wider public transport network*, including integrated ticketing and payment schemes.

²² For instance, www.cycleboom.org/wp-content/uploads/2016/08/cB_ICTTP_Aug16.pdf provides evidence of benefits for older people's mobility and well-being.

²³ <https://como.org.uk/shared-mobility/shared-bikes/shared-mobility-shared-bikes-projects/>.

²⁴ www.cardiffpedalpower.org/our-bikes.

Advice on relevant standards is provided in the Rail Delivery Group's Cycle Rail Toolkit.²⁵

Q7: What role should Government play in understanding, shaping and responding to public attitudes to emerging technologies and services?

The Government needs to develop and monitor public support for (a) traffic restraint policies, including local road user charging schemes and (b) increased provision for cycling. We have already noted (in answer to Q4) that there is public support for (a) traffic reduction; (b) investment in cycling; and (c) road user charging, if the public is confident that the promised benefits will be delivered (see references 16 to 18).

However the most effective behavioural interventions to boost cycle use involve the provision of tailored opportunities for people to 'give cycling a try', e.g. through schools, workplaces and in community settings (where they can be targeted at people from specific demographic groups or those with some other common interest). There is ample evidence that these 'smarter choices' measures provide excellent value-for money – e.g. see the results of the 3 Sustainable Travel Demonstration Towns, and Cycling UK's Big Bike Revival, Community Clubs and Cycling for Health projects quoted in our response to question 5. Further information on the cost-effectiveness of smarter choices measures is provided in Cycling UK's briefings on 'smarter choices'²⁶ and cycle training.²⁷

We therefore urge the Government:

- (a) *To provide a healthy ratio of revenue to capital funding for local transport, to support these kinds of projects*

DfT-funded research suggests that the optimal balance of capital and revenue funding for sustainable transport projects lies between 70-30 to 80-20.²⁸ Cycling UK recommends starting initially at around 70-30 in the early stages of a local cycling strategy, increasing to 80-20 as funding levels increase. This is because relatively low-cost revenue-funded behaviour change projects can achieve relatively quick wins at a local level, whereas capital schemes take longer to develop. However, once capital projects start to come on stream (i.e. once the authority in question has recruited staff, developed a network plan, and has then drawn up, prioritised and consulted on individual schemes), capital budgets will need to increase both in absolute terms and as a proportion of the total walking and cycling budget.

- (b) *To support increased provision of 'Bikeability' cycle training, enabling it to reach adults and pupils at secondary school age, as well as at primary school.*

Bikeability level 2 cycle training is currently offered to just 50% of primary school age pupils. We wish to see this doubled, while substantially increasing the availability of level 3 training for people at secondary school, or for new and returning cyclists in adulthood.

Finally, we urge the Government to develop and monitor the willingness of the public (particularly in urban areas) to live without owning a car, and the likelihood of this

²⁵ www.raildeliverygroup.com/files/Publications/2016-04_cycle_rail_toolkit_2.pdf.

²⁶ www.cyclinguk.org/campaigning/views-and-briefings/smarter-choices.

²⁷ www.cyclinguk.org/campaigning/views-and-briefings/cycle-training.

²⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/606513/cycling-walking-rapid-evidence-assessment.pdf.

increasing further when connected and autonomous vehicles (CAVs) start to become commercially available. There is a risk that the advent of CAVs could substantially increase car ownership, particularly among those (including children) who currently cannot drive. However there is also the possibility of a reduction in private car ownership – particularly in urban areas – once people feel they can call a driverless CAV car in the same way that they can currently call an Uber car. This shift from private to shared car ownership – if well managed – could substantially reduce total car use and the pressures of car parking. That in turn could significantly improve our ability to use road-space efficiently, creating safer, cleaner and more vibrant streets and communities in the process. For more on this, see our response to question 12 below.

Q8: What changes do you expect to the mobility-related labour market? How can Government best support people and businesses affected by these changes?

The Bicycle Association has recently published a report on the economic benefits of increasing cycle use.²⁹ It found that, if the Government were to meet its targets to double cycle use by 2025, this would not only provide a £10bn boost to the British economy but would sustain more than 100,000 jobs. It is thus more valuable to the economy than steel manufacturing.

Q9: What other actions should Government prioritise to help people, businesses and cities prepare for the future?

To ensure that our town and city streets and communities are attractive both for people and for businesses, need to be designed to be safe and people-friendly, as described in response to Q2. However action is also needed to ensure that we have safe drivers and vehicles, as well as safe streets. We highlight two areas which merit attention:

- a) *Improve driver safety in relation to non-motorised road users, through a combination of awareness campaigns, changes to the Highway Code and the driving test, and strengthened road traffic law and enforcement*

Cycling UK strongly believes that all road users should respect the rules of the road and the safety of others.

To achieve this, it is clear from half a century's experience of tackling drink driving that education and enforcement measures need to be pursued hand-in-hand. Education is needed to raise awareness of the rules and why they matter, thereby improving compliance as well as building public support for enforcement activity. However this enforcement activity is also necessary to ensure that educational messages are respected and adhered to. Those who continue to act irresponsibly must be seen to face appropriate sanctions.

Cycle awareness should be integral to the process of driver training and testing, with actual cycle training being a requirement at least for professional drivers.

The Highway Code should be revised, to raise awareness of messages such as:

²⁹ <http://s27245.pcdn.co/wp-content/uploads/2018/06/The-Value-of-the-Cycling-Sector-to-the-British-Economy-FINAL2.pdf>.

- The need to leave plenty of space when overtaking cyclists, particularly on left-hand corners, and the reasons why cyclists are trained to position themselves in the centre of their lane in some situations;
- Opening car doors safely – Cycling UK advocates the use of the ‘Dutch Reach’ i.e. opening the door with the hand further from the door itself, forcing you to look over your shoulder.

Cycling UK strongly advocates the strengthening of roads policing. We are very concerned at the disproportionate cuts to roads police officer numbers in recent years, which have been significantly steeper than for policing overall. There is clear evidence that effective policing is a highly effective road safety measure (the fear of being caught is a far greater deterrent to unsafe behaviour than the resulting penalties). It can also be a very good way to detect and prevent other forms of crime. There is also a need to strengthen other regulatory and enforcement bodies such as the Health and Safety Executive (who are woefully weak in taking enforcement against work-related road safety offences) and the Traffic Commissioners (who lack the resources to tackle unsafe lorry operators). Evidence on these points is provided in Cycling UK’s briefing on traffic police and other enforcement agencies.³⁰

Finally there is a need to revise the law itself, particularly in relation to:

- The definitions of, and penalties for, offences such as ‘dangerous’ and ‘careless’ driving, and their equivalents involving death or serious injury;
- The ‘exceptional hardship’ loophole, whereby convicted drivers routinely evade driving bans;
- The penalties for involvement in ‘hit and run’ collisions where serious or fatal injuries had been caused, or where this possibility should have been obvious to the driver.

Further information on all these proposals is set out in Cycling UK’s response to DfT’s recent consultation on its CWIS Safety Review.³¹

- b) *Reduce the threat to cyclists and pedestrians from heavy goods vehicles, by establishing national standards for lorry operators, drivers and the vehicles themselves (particularly the design of their cabs), and by reducing their use on urban streets.*

Heavy Goods Vehicles (i.e. those over 3.5 tonnes) pose a disproportionate threat to both pedestrians and cyclists. Although they account for just 3.6% of non-motorway motor-vehicle mileage on Britain’s roads, they are involved in around 18% of cyclist fatalities and 14% of pedestrian fatalities. The problem is particularly acute in urban areas: lorries are involved in about a quarter of cyclist deaths in these locations and in well over half of cyclist deaths in London, even though they account for just 4% of miles driven there.³²

³⁰ www.cyclinguk.org/campaigning/views-and-briefings/traffic-police-and-other-enforcement-agencies.

³¹ www.cyclinguk.org/sites/default/files/document/2018/06/1806_cuk_response-to-dft-call-for-evidence_finalv2.pdf.

³² Figures based on the 2017 versions of DfT’s *Road Traffic Estimates in Great Britain*, Table TRA0104 (www.gov.uk/government/uploads/system/uploads/attachment_data/file/722086/tra0104.ods); and *Reported Road Casualties Great Britain*, Table RAS40004 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/665165/ras40004.ods).

Many urban cycling fatalities or serious injuries involve left-turning lorries, partly because most lorry cabs place the driver high off the ground with a lot of metal (rather than window) surrounding them. Compared with buses, it is far harder for lorry drivers to see cyclists or pedestrians alongside or in front of them.

Transport for London has been taking action to promote safe lorries, lorry drivers and operators, notably by:

- Establishing the Construction Logistics and Community Safety (CLOCS) standard, in conjunction with the logistics industry.³³ This encourages and supports operators to commit to, and make progressive improvements on, issues such as the safety of lorries, lorry drivers and the management of construction site access;
- Drawing up a 'direct vision standard' for lorry cabs (which assesses how easily lorry drivers can see cyclists and pedestrians around them) and an associated 'star rating system' for lorry safety, as part of a scheme to progressively remove lorries which are unsuitable for use on urban streets;
- Establishing the London Freight Enforcement Partnership^{34 35} in conjunction with London's Police Forces and the Driver and Vehicle Standards Agency (DVSA), to strengthen collaboration in enforcing safety regulations against unsafe lorries, drivers and operators.

Cycling UK urges DfT to back these initiatives and standardise them nationally. Lorry operators themselves accept the need for some form safety regulation but would understandably resist having to comply with different rules in different cities.

Measures should also be taken to reduce urban lorry traffic, e.g. by making greater use of rail and water-borne transport. Another solution is edge of town 'trans-shipment depots', where HGVs or trains can transfer loads onto smaller, more street-friendly lorries or electric cargo bikes for delivery to their final destination.

More too should be done to maximise the potential for cargo bikes to deliver smaller consignments in urban areas – these could significantly reduce the number of delivery vans on busy streets. For more on this, see our response to question 11.

Again, further information on all these proposals is set out in Cycling UK's response to DfT's recent consultation on its CWIS Safety Review.³¹

Q10: Which 'missions' in the areas we have identified could be most effective in driving innovation and investment? Please refer to the criteria suggested in paragraph 2.6.

- a) *Boosting cycle use, particularly among those who are currently under-represented in cycling: older people, women etc.*

We have already set out (in answer to questions 4 and 5) the case not only for boosting cycle use in general, but also for widening the demographic of those who

³³ www.clocs.org.uk/page/clocs-standard.

³⁴ <https://tfl.gov.uk/info-for/media/press-releases/2015/october/enforcement-partnership-to-make-london-s-streets-safer>.

³⁵ <https://tfl.gov.uk/info-for/media/press-releases/2017/november/partnership-checks-more-than-33-000-vehicles-to-keep-london-s-roads-safe>.

take up cycling, e.g. by seeking to boost cycle use among women, younger and older people, people with health conditions, people with disabilities and people from ethnic minority groups and other disadvantaged groups who are under-represented in cycling. This would not only provide a range of economic, health, environmental and quality of life benefits, but would also increase the economic contribution of the cycling sector in its own right (see our response to question 8).

b) *Boosting the use of e-bikes, particularly among the above groups.*

There is a particularly good case for boosting the uptake of e-bikes, as part of the Government's Industrial, Clean Growth and Clean Air strategies.

The European market for e-bikes grew nearly 12-fold from 2006 to 2014 (from 98K to 1139K units annually).³⁶ Yet the UK's e-bike market is very under-developed, compared with countries like the Netherlands (where e-bikes account for 21% of bike sales) or Belgium (50% of sales).³⁷

There is very good evidence that projects to promote e-bike use are effective not only in promoting increased cycle use but also in reducing car use (and hence pollutant emissions). Initial feedback from demonstration projects run by the charity CoMoUK (previously known as Carplus Bikeplus) found that that 46% of participants were using e-bikes for regular trips that they had previously made by car or taxi.³⁸ A separate e-bike hire project in Brighton found that participants reduced their car use by an average of 20% during the project.³⁹ These results match findings of reduced car-use from other e-bike projects in the UK and the Netherlands,⁴⁰ Norway,⁴¹ Switzerland,⁴² Australia⁴³ and California.⁴⁴

Taken together these studies also indicate that:

- People are willing to use e-bikes for longer and/or hillier trips than they would be willing to make using conventional bicycles;
- Their additional speed means they can compete with cars on journey times over longer distances than conventional bicycles can;
- For drivers wishing to reduce their car use, e-bikes are in many ways a preferable alternative to e-cars. They cost less to operate, they provide additional health and (in many cases) time-saving benefits, they are easier to store (avoiding the need to find and pay for parking spaces), and their batteries are easier to charge.

³⁶ www.ziv-zweirad.de/uploads/media/European_Bicycle_Market_Profile_2015_by_CONEBI_01.pdf.

³⁷ <https://ecf.com/news-and-events/news/62-million-electric-bicycles-2030-eu-need-home>.

³⁸ www.carplusbikeplus.org.uk/wp-content/uploads/2016/03/Shared-Electric-Bike-Programme-Report-Year-1-2016.pdf.

³⁹ www.smart-ebikes.com/smart-ebikes/.

⁴⁰ www.sciencedirect.com/science/article/pii/S0966692316301934#bb0065.

⁴¹ <http://dx.doi.org/10.1016/j.trd.2015.02.005>.

⁴² www.bfe.admin.ch/energie/00588/00589/00644/index.html?lang=eng&msg-id=54695.

⁴³ <http://dx.doi.org/10.1016/j.jth.2015.03.001>.

⁴⁴ <https://linkinghub.elsevier.com/retrieve/pii/S2214367X13000185>.

Q11: How should Government funding be targeted to help UK innovators build and scale transport solutions?

Boost the use of e-bikes for both personal and freight journeys.

Given the evidence of the effectiveness of projects to promote e-bike use (see point (b) in response to question 10 above), we find it extraordinary that Government's Office for Low Emissions Vehicles (OLEV) provides generous subsidies for the uptake of electric cars and vans, but no support whatsoever for e-bikes.

We know of no direct comparisons of the cost-effectiveness of support for electric cars and e-bikes respectively. However we strongly suspect that support for e-bikes is likely to be a lot more cost-effective than for e-cars in reducing greenhouse and pollutant emissions, bearing in mind the evidence of reductions in car use and also the far greater energy-efficiency of e-bikes compared with electric cars. The associated health, safety and congestion-reduction benefits would, of course, be added bonuses.

OLEV disputes claims that e-bikes would help reduce car use, however this is flatly contradicted by the many studies referenced above. Moreover, support for e-bikes could deliver reductions in congestion, road danger and physical inactivity that cannot be achieved by supporting electric cars. It would also strengthen UK-based e-bike manufacturers like Wisper and Urban Mover⁴⁵, contributing further to the Government's Industrial and Green Growth strategies.

Electric cargo-bikes also have the potential to replace vans, particularly for 'last-mile' goods deliveries in urban areas. The EU-wide Cyclelogistics project⁴⁶ (to which Cycling UK contributed) found that 51% of motor-vehicle trips in EU towns involving the transport of goods could be accomplished by cargo bikes.⁴⁷ Supporting the manufacture of electrically-assisted cargo bikes could also prove significant benefits for UK businesses.

We are heartened that the Government has committed to an announcement of some support specifically for electric cargo bikes later this year,⁴⁸ and there has been a suggestion of a possible further announcement of wider support for e-bikes through the Cycle to Work scheme.⁴⁹ However we have noted previously that this form of support would not be available to many of the people who have most to gain from e-bikes but who are least likely to take up cycling without proactive support – e.g. older people, people with disabilities and/or inactivity-related health conditions. We therefore reiterate our call not only for general support for the uptake of e-bikes, but also for some specific support to promote their use among these groups – see point (b) in response to question 5.

Q12: Which laws or regulations not currently being addressed need to be amended or created to help harness the benefits and mitigate any risks associated with new transport technologies or services?

a) *Regulation of Connected and Autonomous Vehicles*

⁴⁵ See <http://wisperbikes.com/> and <https://urbanmover.com/>.

⁴⁶ <http://cyclelogistics.eu/>.

⁴⁷ http://cyclelogistics.eu/docs/111/D6_9_FPR_Cyclelogistics_print_single_pages_final.pdf.

⁴⁸ www.gov.uk/government/news/birmingham-to-host-worlds-first-zero-emission-vehicle-summit.

⁴⁹ www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-07-19/166234/.

The prospect of ‘driverless cars’, or autonomous vehicles (AVs), is now being widely discussed by motor-manufacturers and politicians alike. Testing is now underway at three UK locations, and Parliament has recently passed legislation to clarify civil liability in the event of collisions.

In terms of enabling more people to cycle more safely and conveniently, AVs could be a huge blessing or a terrible curse, depending on how the technology and the legislation governing it evolves:

- *Viewed positively:* if people could summon a driverless car when they needed one, this might reduce demand for private car ownership. Given that the average car spends 23 hours a day stationary, this could free up vast amounts of parking space. Finally, space for cycle provision could be freed up thanks to AVs’ ability to steer very precisely – following one another as if they were on rails.
- *Viewed negatively:* AVs could massively increase car ownership if every child and adult were able to own one. Moreover, fears that pedestrians and cyclists could hinder the progress of AVs could result in new laws to ‘keep them out of the way’, reducing the freedom and flexibility of cycle and pedestrian movement, particularly on quieter and narrower streets and lanes. There is also the more immediate concern, already borne out by trials, that AV drivers could become increasingly inattentive, relying on technology that is actually very unreliable.

There may come a time when AVs become more reliable than human drivers not only at detecting pedestrians and cyclists, but also at predicting their movements. At that point, Cycling UK might take the view that we should switch as quickly and completely as possible to the use of AVs – alongside a rapid switch to the shared ownership of electric vehicles. The transition period should be as short as possible, given the problems of mixing AV technology with conventional human drivers.

Until then, however, Cycling UK would strongly resist their use on roads other than on motorways or to assist with parking. Also, given that today’s cyclists communicate with human drivers largely through hand-signals and eye contact, an equivalent will need to be found before they can mix safely with driverless vehicles.

In the meantime, legislation is needed to determine criminal (as well as civil) liability in collisions involving AVs, e.g. where a driver puts an AV into autonomous mode in inappropriate circumstances (which need to be clearly defined), or fails to resume control when the vehicle indicates that driver intervention is needed.

b) Proportionate regulation of hire-bike services (esp dockless)

The recent influx of ‘dockless’ hire bike operators (such as Ofo and Mobike) has understandably been greeted as a mixed blessing, not least by local authorities. On the one hand, it offers the potential to introduce hire-bike schemes at significantly lower costs than docked schemes (such as London’s Santander Cycles, aka ‘Boris Bikes’). On the other hand, there is the risk of irresponsible behaviour by users (e.g. vandalising bikes, hiding them in locations where other potential users cannot access them or dumping them where they are an obstruction or danger to others).

It is accepted by all the key players in the hire-bike sector that some form of regulation is needed, to protect both the public and responsible hire-bike operators from ‘cowboy’ operators. This is likely to involve giving powers for councils to determine:

- The maximum number of hire-bikes, and hire-bike operators, in their areas;
- Any areas where hire-bikes may not be left, in order to avoid obstructions and ‘clutter’;
- Any parts of their area where hire-bike provision is required, in order to deliver public benefits (e.g. in areas of transport poverty that might otherwise not be served);
- Integration with public transport payment and ticketing schemes.

c) Proportionate regulation of pedicabs

At present, pedicab rides in London are seen primarily as a form of entertainment rather than as a serious transport option. However, with proper support, pedicabs could provide a clean, low-impact alternative to taxis as an adjunct to a town or city’s public transport system. They also offer healthy employment for their riders.

However, as with hire-bike schemes, there is a need to ensure that responsible pedicab operators can flourish without being undermined, both economically and reputationally, by ‘cowboy’ operators. Such regulation should cover:

- The safety of pedicabs, including their braking systems and safety belts;
- The safe management of pedicab fleets and riders, recruitment and employment practices, and financial good repute of pedicab operators;
- The training, geographical knowledge and lawful behaviour of pedicab riders, including an obligation on pedicab operators to maintain a register of riders.

Q13: How could the experience of working with local and/or national regulators be improved for transport innovators?

We have cited above the need for proportionate regulations to enable responsible hire-bike and pedicab operators alike to flourish, and to prevent them being undermined both reputationally and economically by ‘cowboy’ operators.

Unfortunately the experiences of the London Pedicab Operators Association (LPOA) do not bode well. They have long sought to introduce proportionate pedicab regulation. Yet instead they have been engaged in long-running battles with both Transport for London and Westminster City Council. Both authorities have at times seemed willing to agree to their proposals, but have then reverted to demonising irresponsible pedicabs without putting in place the regulations which would prevent them from operating.

In practice though, it would be vastly preferable to put in place some national regulations. It makes no sense that:

- In London, pedicabs are effectively operating as ‘stage carriages’, exploiting the fact that there is no statutory definition of these vehicles and no regulations governing their vehicles, riders or operators;
- Outside London, they could only operate as ‘hackney carriages’, which in turn would impose prohibitive insurance and other costs that are simply not necessary for non-motorised vehicles. In practice, this means they cannot ply for hire at all, even where the local authority wishes to support them. They can only operate sponsored services which are paid for by advertisers rather than the passengers they carry.

For more information, see ⁵⁰.

We urge the Government to step in and put in place sensible regulations that would allow responsible operators of hire-bike schemes and pedicabs alike to flourish.

Q14: What further actions should Government prioritise for resolving barriers to data sharing and use in the mobility sector while protecting privacy and security?

Open data and data-sharing are important for good transport planning as well as for travellers themselves. We have two recommendations in this respect:

a) Overhaul the National Transport Model

At present, the National Transport Model (NTM) is predicting a decline in cycle use, despite the Government aiming to substantially increase it. This is a self-fulfilling negative prophecy. When local authorities use NTM data to construct local models, and then decide whether to include cycle provision, the assumption that future cycle use will be low – and that motor traffic volumes will increase substantially – means that cycling infrastructure proposals emerge as poor value for money. Hence it becomes difficult to justify the investment, which then does not get made, and cycle use languishes as a result.⁵¹

The assumptions and workings of the NTM need to be open-source and readily accessible. It would then be a much more useful as a tool for planners and researchers to develop different future scenarios which are more in line with the Government's own stated objectives for increased cycle use as part of a wider future for safe, healthy, low-emissions transport.

b) Support the continued development of the Propensity to Cycle Tool (PCT) and the Cycle Infrastructure Prioritisation Tool (CylPT)

Specifically in terms of cycle planning, Cycling UK strongly supports the DfT-funded Propensity to Cycle Tool (PCT) and the Cycle Infrastructure Prioritisation Tool (CylPT), as excellent tools for helping local councils and others to identify where there is the greatest potential for investment in cycling. However PCT can currently only really plan for commute trips (as this is the only trip-type for which there is adequate origin-destination data at the very local level), and it does not yet cover multi-modal journeys (e.g. combining cycling and public transport). Meanwhile the outputs from the CylPT could be greatly improved there was consistent nationwide data about the state of road and cycle infrastructure.

We urge DfT to:

- Support the provision of local-level data for trip-types other than commute journeys, notably journeys to school, and the inclusion of cycle-rail travel as an option for longer-distance journeys
- Support the development of consistent national data on highway infrastructure (including carriageway and lane widths, the existence and widths of cycle lanes and cycle tracks), speed limits, banned turns and other banned movements etc.

⁵⁰ www.cyclistsdefencefund.org.uk/pedicabs.

⁵¹ www.cyclinguk.org/news/government-planning-to-fail-on-cycling.

c) *Integrated ticketing for cycle-rail reservations and hire-bike schemes*

We have previously noted the need to be able to reserve cycle spaces on longer-distance trains (i.e. those for which seats can also be reserved) in real time. The processes for doing so are unwieldy. This makes it difficult for cycle users to plan journeys, particularly in real time (e.g. when they are about to miss a connection due to a late-running train).

There would also significant benefits from being able to integrate cycle-hire schemes with public transport ticketing.

We urge Government to work with the Rail Delivery Group in supporting the development of systems that can meet both these needs.

Q15: Do you have any further suggestions or comments on the subject of this call for evidence?

The format of this call for evidence comprises an online questionnaire with a fixed set of questions, to be answered in a fixed order, with includes no scope for respondents to provide a summary of their key messages. This forces respondents to fit their key points to the set questions, which does not necessarily enable them to present those points as clearly as they would wish to do. It would be better if respondents were able to set out some key points at the outset of their responses.

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