

A submission from Cycling UK to consultation on the TRANSPORT DECARBONISATION PLAN

INTRODUCTION

Cycling UK was founded in 1878 and has 72,000 members and supporters. Historically known as 'CTC' or the 'Cyclists' Touring Club', Cycling UK's central charitable 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 for society. Cycling UK is a member of the Walking and Cycling Alliance (along with the Bicycle Association, British Cycling, Living Streets, Ramblers and Sustrans) as well as the Healthy Air Campaign.

Cycling UK has been pleased to provide oral as well as written evidence to a number of Transport Committee inquiries in recent years, notably its inquiry on Active Travel in 2019, whose recommendations we strongly supported. Our written submission to that inquiry¹ provided an overview of the economic, environmental, health and quality-of-life arguments for investing in cycling, hence we do not repeat them here.

Cycling UK has strongly welcomed the 6-point vision for a zero-emissions transport system, as set out on the Government's document 'Decarbonising Transport: setting the challenge'.² We particularly welcome its stated aim that:

"Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less..."

We have also given our strong backing to the Government's recently published 'Gear Change' vision for cycling and walking,³ issued along with a new Local Transport Note LTN 1/20 on Cycling Infrastructure Design,⁴ and a consultation on revisions to the Highway Code to improve cycling and pedestrian safety.⁵ Although this response highlights some important omissions from the 'Gear Change' vision, overall we strongly support it, and this submission mostly focusses on specific policies needed to implement the vision.

The key omissions we wish to highlight are:

- The need for a wider *vision and targets to halt and reverse the growth of private motorised transport*, accompanied by appropriate policies and resource allocations, to ensure that road transport makes its 'fair' contribution to meeting the Government's 'net zero' target and, more imminently, updated carbon budgets in line with the 'net zero' target.
- A commitment to *lower the 'default' speed limits* for built-up streets and for non-built-up single-carriageway roads respectively.
- A commitment to *improve driver awareness of cycle safety* (through strengthening of driver testing and training, and through promotion of the Highway Code, including the

¹ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/transport-committee/active-travel/written/91593.pdf>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878642/decarbonising-transport-setting-the-challenge.pdf

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

⁴ www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120

⁵ www.gov.uk/government/consultations/review-of-the-highway-code-to-improve-road-safety-for-cyclists-pedestrians-and-horse-riders

changes now being proposed), backed by measures to *strengthen road traffic law and its enforcement*.

- Policies and funding allocations to *boost the diversity of people taking up cycling* (as well as their numbers), e.g. by supporting cycling projects for women, older people, people with disabilities and people from other disadvantaged groups or backgrounds (n.b. these policies should be additional and complementary to the proposals in ‘Gear Change’ to broaden the provision of cycle training, and to make cycling opportunities available through the NHS).
- Support for *bike sharing schemes*.

Our full set of recommendations for the Transport Decarbonisation Plan is as follows:

RECOMMENDATIONS

1. ROAD TRAFFIC REDUCTION	4
1.1. Set an explicit policy objective and an overarching road traffic reduction target to halt and reverse the growth of private motorised traffic, so that road transport contributes to meeting the Government’s ‘net zero’ CO ₂ emissions reduction commitment and consequent carbon budgets. Define targets for reduced trip-making and for increased use of active and sustainable transport modes, in line with this overarching target.	4
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2.1. Shift the balance of transport spending away from investment in new road capacity and towards active and sustainable transport as well as measures to reduce travel demand (e.g. broadband investment, car-sharing or lift-sharing initiatives), in line with the above targets for road traffic reduction and shift in transport modes.	15
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3.2. Ensure that Highways England and HS2 Ltd act as models of good practice in consistently adhering to (or exceeding) the standards set out in the new Cycling Infrastructure Design guidance	19
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4.3. Strengthen road traffic law and its enforcement by: (a) boosting the priority and resourcing of roads policing and other enforcement bodies (e.g. the Traffic Commissioners, Health and Safety Executive); and (b) carrying out a comprehensive review of road traffic offences and penalties, including the definitions of ‘dangerous’ and ‘careless’ driving.	26
4.4. Reduce the use of road freight, and the danger it poses to other road users, by: (a) maximising the use of rail and waterborne freight; (b) requiring the progressive adoption of ‘direct vision’ lorry cabs; and (c) maximising cargo-bike use for ‘last mile’ deliveries’.....	28
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5.1. Support the combination of cycling with travel by train, bus, tram and other public transport by: (a) improving access to and provision for cycling at stations, stops and interchanges; (b) improving opportunities to carry pedal cycles on trains and other public transport vehicles; (c) improving information and customer service for those wishing to combine cycling and public transport; and (d) strengthened stakeholder consultation and monitoring to identify what is working and where improvements are needed.....	29
5.2. Support the development and use of public bike hire and sharing schemes.....	36
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6. CYCLING OPPORTUNITIES FOR ALL	40
6.1. Support programmes (in addition to the planned expansion of cycle training and the plan for ‘cycling on prescription’ through the NHS) to boost cycle use among groups who are under-represented in cycling, including women, older and disabled people, people from black and minority ethnic communities and other disadvantaged groups.....	40

A short summary of this response, and an abbreviated version of it, are also available at: www.cyclinguk.org/decarbonising-transport-being-led-science

1. ROAD TRAFFIC REDUCTION

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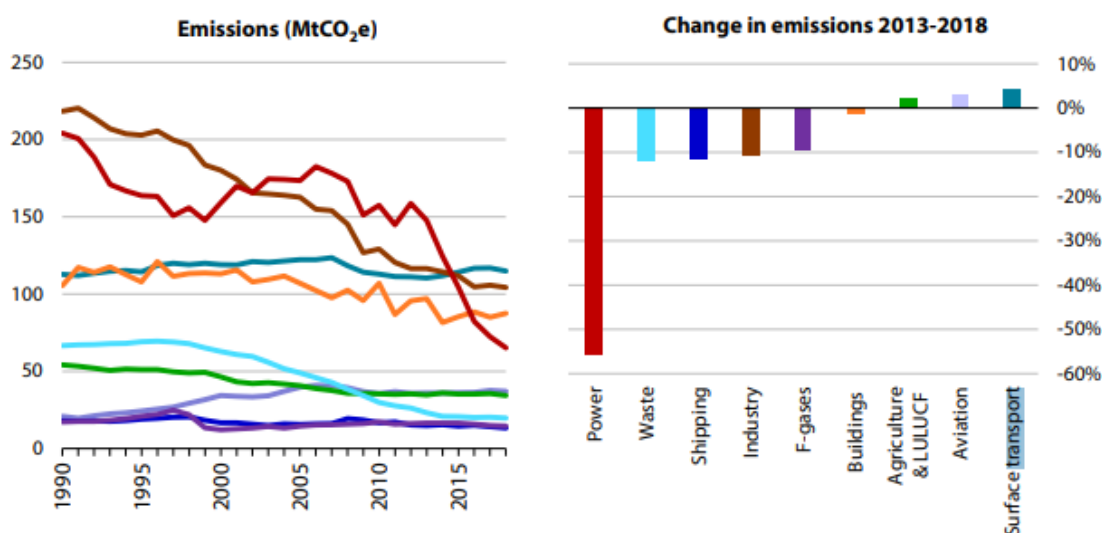
The need for road traffic reduction

Cycling UK strongly supports the 6-point vision for a zero-emissions transport system, set out in 'Decarbonising Transport: setting the challenge'.⁶ We particularly welcome its stated aim that:

"Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less..."

The UK's territorial emissions of CO₂ in 2018 (i.e. excluding international aviation and shipping) amounted to 365.7Mt. Transport accounted for 136.8Mt of CO₂ emissions by end user, i.e. 37.4% of all domestic CO₂ emissions. Road transport was responsible for 123.3Mt of CO₂ emissions (i.e. 90% of total domestic transport emissions, and 33% of all territorial emissions). Cars accounted for 74.8Mt of these emissions.⁷

Alternatively, transport's share (by end user) of total greenhouse gas emissions amounts to 31% (139.0 MtCO₂-equivalent out of 451.5 MtCO₂e).⁸



Source: BEIS (2019) 2018 UK Greenhouse Gas Emissions, Provisional Figures; BEIS (2019) 2017 UK Greenhouse Gas Emissions, Final Figures; CCC calculations.

Notes: The chart on the right-hand side shows changes in sectoral emissions between 2013 and 2018 for all sectors except for Agriculture, LULUCF, Waste and F-Gases which cover the period 2013-2017; buildings emissions in this chart are temperature-adjusted.

⁶ See reference 2.

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875508/final-greenhouse-gas-emissions-tables-2018.xlsx, table 20

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875508/final-greenhouse-gas-emissions-tables-2018.xlsx, table 19

In contrast to marked reductions in overall emissions of greenhouse gases (notably in the energy sector), transport's greenhouse gas emissions have changed little since 1990. Initial increases in the early 1990s were reversed due to reductions in road traffic following the 2008 recession, but have generally been rising again (albeit slightly) since 2013.⁹

Transport's share (by end user) of total greenhouse gas emissions has therefore increased steadily from 18% in 1990 to 31% in 2018 – or from 24% to 37%, if we consider only CO₂ emissions.¹⁰ Improvements up to 2016 in the average vehicle efficiency of new cars have been largely offset by increases in road mileage.

In any case, there has been a reversal in the average efficiency of new cars in the UK since 2016, due to a sharp rise in sports utility vehicle (SUV) sales. A recent report found that, although SUVs accounted for around 10% of car sales in 2010, this had risen to over 40% by 2019.¹¹ SUVs are not just problematic in terms of CO₂ and pollutant emissions. They also use road and parking space very inefficiently – the same report estimated that over 150,000 new cars sold in the UK in 2019 were too large to fit in a standard UK parking space. SUV's are also a disproportionate threat to pedestrians and cyclists.

The Committee on Climate Change (CCC, the Government's statutory advisor on meeting its carbon budgets under the Climate Change Act 2008) has strongly criticised the lack of progress on reducing transport emissions.¹² Calling for substantially increased progress in every sector, the CCC added that this need was “especially acute for those sectors such as transport ... where emissions have not fallen significantly over recent years.”

Other compelling reasons to reduce our dependence on motorised travel include:

- *Congestion*: This is estimated to cost the UK economy £30 billion a year.¹³
- *Air pollution*: Pollution, particularly nitrogen dioxide (NO₂) and particulate matter (PM_{2.5}) is estimated to contribute to between 28,000 and 36,000 early deaths annually in the UK,¹⁴ at an economic cost of £20bn or more.¹⁵ Road transport is a substantial contributor to these deaths. The UK Government has faced several successful legal challenges over its failure to reduce pollution to within legal limits.¹⁶
- *Road danger*: 1,782 people were killed and another 158,596 were reported as injured (25,484 of them seriously) on Britain's roads in 2018.¹⁷ The economic costs of these casualties was estimated to be £35bn.¹⁸
- *Physical inactivity*: Around 11.8m women and 8.3m men are insufficiently active to meet recommended guidelines.¹⁹ Physical inactivity increases the risks of cardiovascular disease, type 2 diabetes, colon cancer, dementia, fractures and depression, while increasing all-cause mortality by 30%. It is estimated to cost the UK £7.4bn annually.²⁰

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875522/Annex_1990-2018_UK_GHG_Emissions_final_figures_by_end_user_sector_by_fuel_and_uncertainties_estimates.pdf

¹⁰ See references 8 and 7.

¹¹ <https://static1.squarespace.com/static/5ebd0080238e863d04911b51/t/5f21659998148a15d80ba9be/1596024223673/Upselling+Smoke+FINAL+23+07+20.pdf>

¹² www.theccc.org.uk/wp-content/uploads/2019/07/CCC-2019-Progress-in-reducing-UK-emissions.pdf

¹³ www.clearview-intelligence.com/blog/were-jamming-and-not-in-a-good-way-the-cost-of-congestion-on-the-uks-roads-is-30-billion

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf

¹⁵ www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

¹⁶ www.clientearth.org/government-loses-third-air-pollution-case-judge-rules-air-pollution-plans-unlawful

¹⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820562/Reported_road_casualties_-_Main_Results_2018.pdf

¹⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833803/ras60004.ods

¹⁹ www.bhf.org.uk/informationsupport/publications/statistics/physical-inactivity-report-2017

²⁰ www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health#why-promote-physical-activity-in-your-professional-practice

However a distinction should be made between the policies needed to tackle transport-related CO₂ emissions and those most suited to addressing transport's other, more 'urban', impacts. This is important, given that 30% of road transport's CO₂ emissions arise from just 3% of road journeys. Shorter car journeys (particularly in urban areas) are more easily replaceable by walking, cycling and public transport. Yet if the Transport Decarbonisation Plan (TDP) were to rely solely on these options, it would fail to tackle the problems of longer-distance road travel. Replacing long journeys with shorter journeys (e.g. by incentivising travel to local shops rather than out-of-town superstores) would then of course make it easier to switch those journeys to more sustainable transport modes.

The TDP therefore needs to set out policies aimed at:

- Reducing travel overall – e.g. investing in broadband to reduce the need to travel for business meetings etc; and...
- Reducing the lengths of journeys – e.g. by planning and locating new developments such that housing, employment and retail opportunities are closer to one another (i.e. “destination shifting”); as well as...
- Enabling people to switch from car travel to healthier and more sustainable alternatives (i.e. “mode shifting”).

Sections 1 and 2 of this response focus primarily on reducing travel demand, by reducing both the number and the length of trips that need to be made. With shorter trip patterns, it then becomes easier to enable people to choose healthier and more sustainable transport options for those journeys (e.g. cycling, walking or public transport). Sections 3 to 6 are then concerned more specifically with the policy measures needed to boost cycling – recognising that there is a great deal of synergy between these policies and those needed to support walking and public transport.

The need for traffic reduction targets

Following the Secretary of State's recognition of the need to “use our cars less”, a key task for the Transport Decarbonisation Plan is to determine what level of motor traffic reduction is needed to meet the Government's 2050 'net-zero' target, and the revised carbon budgets which will necessarily flow from the adoption of this target (n.b. the current carbon budgets were aimed at meeting the previous target for an 80% reduction in CO₂ emissions by 2050, rather than aiming for 'net zero').

The level of traffic reduction needed will significantly depend on assumptions about: (a) how quickly the UK's motor vehicle fleet can be switched to fully battery-electric vehicles; and (b) how quickly the power supply for these vehicles can be decarbonised.

In a briefing for Friends of the Earth, consultancy Transport for Quality of Life (TQL) has estimated that, to be on course for a 'net zero' economy by 2045 (i.e. 5 years before the Government's subsequently-adopted target date), motor traffic (i.e. the total distance travelled by motor vehicles) will need to be reduced by at least 20% by 2030, even under the most optimistic scenario for switching to battery-electric vehicles and decarbonising their power supply. Under more pessimistic assumptions, that figure increases to 60%.²¹

It should be noted that this more pessimistic scenario assumes that the target date for banning the sale of new petrol, diesel and hybrid vehicles remains at 2040 – whereas the Government has recently closed a consultation on bringing this date forward to 2035.²²

²¹ <https://policy.friendsoftheearth.uk/insight/more-electric-cars>

²² www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans

However, the key point is that relying on a switch to electric vehicles will not be sufficient. There is also a need for significant traffic reduction, even under the most optimistic scenario about uptake of battery-electric vehicles and the decarbonisation of their power supply.

An evidence-based approach to target-setting

Given the above, the Transport Decarbonisation Plan therefore needs to set a target date for halting the growth of private motor vehicle traffic, with further targets for reducing it thereafter. These targets need to 'follow the science', ensuring that road transport is on track to meet its share of the Government's 'net zero' target and its carbon budgets.

Cycling UK urges that these targets should be informed by evidence-based modelling. The first step would be to determine the level of traffic reduction needed to meet the Government's 'net zero' targets and its consequent carbon budgets (let us call this X%), using an approach such as that used by Transport for Quality of Life. Then, using anonymised trip data from the National Travel Survey, modelling would be used to:

- Identify the X% of personal trips that could most easily switch either to a lower-carbon transport mode (walking, cycling, public transport etc), or not travelling at all;
- Identify the corresponding increases in trip-making by walking, cycling, public transport, not travelling, etc;
- Identify the policies and funding allocations needed to achieve these changes.

In short, it would deliver an evidence-base to inform both the setting of evidence-based targets for transport policy, and the allocation of funding needed to meet these targets.

Introducing traffic reduction targets: the Road Traffic Reduction Acts and Environment Bill

Given the Government's recognition of the need to reduce motor traffic, Cycling UK and its allies urge the enactment of a legal commitment to adopt new traffic reduction targets. This could be done in two ways.

The first is by reviving existing powers in the Road Traffic Reduction (National Targets) Act (RTRA) 1998.²³ The RTRA 1998 mandates the Secretary of State (SoS) either to set national targets for reduction of road traffic, or to write a report setting out: (a) his reasons for not doing so, (b) any alternative targets or measures he intends to adopt, and (c) an impact assessment of those other targets and measures.

In fulfilling these duties, the SoS is required to "*have regard to the adverse impacts of road traffic, including (a) the emission of gases which contribute to climate change; (b) effects on air quality; (c) effects on health; (d) traffic congestion; (e) effects on land and biodiversity; (f) danger to other road users; and (g) social impacts*".

Meanwhile the Road Traffic Reduction Act 1997 empowers the SoS to issue guidance on traffic reduction to local authorities. They would then be required either to set local targets to reduce road traffic (or to reduce the rate of growth of road traffic), or to publish a report setting out their alternative proposals, in accordance with the SoS's guidance.

The RTRA 1998's one failing is that it only required the SoS to adopt updated targets and /or to publish further road traffic reduction reports "at such times as he deems appropriate".

²³ See www.legislation.gov.uk/ukpga/1998/24/contents and <http://researchbriefings.files.parliament.uk/documents/SN00420/SN00420.pdf>

In practice, only one Road Traffic Reduction Act report was ever published, and that was 20 years ago.²⁴ Given the Committee on Climate Change's criticisms of the failure to ensure transport is on track to comply with the Government's carbon 4th and 5th budgets, and the success of numerous legal challenges over non-compliance with air pollution limits, it is strongly arguable that the RTRA's provisions already require the Secretary of State either to set new road traffic reduction targets, or at least to write a new Road Traffic Reduction Act report. We urge that he should do so.

Notwithstanding, we would also urge the adoption of an amendment to the RTRA that would require the Secretary of State to consider road traffic reduction targets and/or reports with a defined frequency (say, every 2 years), rather than merely "at such times as he deems appropriate". This would clarify the situation beyond doubt.

The second option would be simply to add "road traffic levels" to clause 1 of the Environment Bill. This clause defines "key priorities" for which the Secretary of State must set at least one long-term target.

1.2. Reduce travel demand through various pricing measures, to reflect the environmental and economic costs of consuming fuel and occupying both road and parking space. Earmark the proceeds for investment in active and sustainable transport alternatives.

We have previously cited the need for a suite of pricing mechanisms to reduce motorised travel demand, as well as providing a revenue stream that could fund improvements to healthy and sustainable transport options. However it should be noted that different policy levers are suited to tackling different adverse impacts of road transport.

The measures most suited to tackling greenhouse gas emissions are those which relate most closely to fuel consumption and/or which deter the longest journeys. Fuel duty is clearly a key policy tool, but so too are parking levies to reduce demand at out-of-town destinations.

These should nonetheless be complemented by policy measures aimed more at promoting healthy and sustainable travel in urban areas, bearing in mind the co-benefits of reducing not only greenhouse gas emissions but also congestion, pollution, road danger and physical inactivity, while creating improved opportunities for walking and cycling.

Fuel duty

The 'road fuel escalator' (now generally known as the 'fuel duty escalator') was introduced in the March 1993 Budget. Its stated aim was "to shift the tax burden from car buyers to car users; and to help both the environment and the industry."²⁵

However, successive Chancellors have frozen fuel duty increases under successive budgets since 2011. A report in 2018 by Greener Journeys estimated that fuel prices at the pump that year were 13% lower than they would otherwise have been if the 'fuel duty escalator' had continued to be applied from 2011 onwards. It also estimated that, as a direct result of these fuel duty freezes:

- Road traffic has grown by 4%, worsening both congestion and pollution;

²⁴ Department for the Environment, Transport and the Regions (DETR), 2000. *Tackling congestion and pollution: the Government's first report under the Road Traffic Reduction (National Targets) Act 1998*. Not available online.

²⁵ <http://researchbriefings.files.parliament.uk/documents/SN03015/SN03015.pdf>

- The increase in traffic has produced an additional 4.5 million tonnes of CO₂, including 2.8 million from cars and taxis and 1.7 million from lorries and vans;
- The increase in traffic has produced 12,000 tonnes of NO_x, and 816 tonnes of PM_{10s};
- The freeze on fuel duty cost the Treasury around £7 billion in lost tax revenue in 2017. Since 2011 the freeze has cost the Treasury around £46 billion. In addition, there had been less rail revenue and more rail subsidy;
- Public transport usage has decreased by between 1.3% and 3.9%, causing there to be up to 60 million fewer rail journeys and up to 200 million fewer bus journeys.²⁶

Paradoxically though, the prospect of success in decarbonising transport raises even more serious concerns about future reductions in fuel duty revenues. A 2017 report by the Policy Exchange think-tank found that the Treasury had projected that fuel duty revenues would increase from £28bn in 2017 to £40bn in 2030, yet this estimate took no account of the Government's decarbonisation objectives. It found that, if the Government were to reduce transport emissions in line with the trajectories called for by the Committee on Climate Change, fuel duty revenues in 2030 would be £17 - £31bn, i.e. around £9 - 23bn lower than the Treasury's projections.²⁷

(It should also be noted that the CCC's trajectories were, and still are, based on a target to reduce CO₂ emissions in 2050 by 80%, rather than the more ambitious 'net zero' target which has subsequently been adopted. Achieving reductions in line with the new 'net zero' target would leave an even larger shortfall in the Treasury's projections).

Hence there is an increasingly compelling case, both environmentally and from a budgetary perspective, for fiscal action to reduce both greenhouse gas and pollutant emissions from road transport, as well as its other adverse impacts (congestion, road danger, physical inactivity etc).

Private non-residential parking

One option for restraining road traffic demand, while providing a revenue stream to support alternatives, is a levy on either workplace parking or, more broadly, on all forms of private non-residential parking. The latter would include not only workplaces but also out-of-town superstores etc. There is good evidence that parking restraint is effective at restraining motor traffic demand.²⁸

The Transport Act 2000 already allows local authorities to raise a workplace parking levy. It has been successfully implemented by Nottingham City Council, with the proceeds being used to fund the city's tram system. However the levy was found to have been an effective traffic restraint policy even before the tram was introduced.²⁹

We urge that the Transport Act 2000 powers be broadened to allow levies to be raised on other forms of private non-residential parking. By enabling local authorities to reduce demand for travel to out-of-town locations, this could be a powerful means of reviving local high streets. It could therefore enable existing car-dependent shopping trips to be replaced by shorter trips, that could in turn be made more easily by walking, cycling or public transport. It could therefore achieve both 'destination shifting' and 'mode-shifting'.

²⁶ <https://greenerjourneys.com/wp-content/uploads/2018/06/THE-UNINTENDED-CONSEQUENCES-OF-FREEZING-FUEL-DUTY-JUNE-2018.pdf>

²⁷ <https://policyexchange.org.uk/cutting-road-transport-emissions-could-cost-billions-in-lost-taxes>

²⁸ www.tandfonline.com/doi/abs/10.1080/01441647.2019.1666929?journalCode=trv20

²⁹ www.researchgate.net/publication/318767555_Evaluating_the_impact_of_a_workplace_parking_levy_on_local_traffic_congestion_The_case_of_Nottingham_UK

Road user charging and other policy levers

Another Transport for Quality of Life (TQL) report for Friends of the Earth considered other policies that could be deployed both to reduce demand for road travel and to provide funding for sustainable and healthy alternatives.³⁰ It advocated three principles for raising transport funding:

- *Principle 1:* Transport budgets should be re-allocated from climate (and other environmental) ‘bads’ to climate ‘goods’;
- *Principle 2:* Local authorities should have powers to raise their own funds for sustainable transport;
- *Principle 3:* Increased funding for sustainable transport should be drawn from all the beneficiaries of better transport services, not just passengers and tax-payers.

It proposed that shifting roads spending to local sustainable transport (in accordance with Principle 1) could yield at least £7bn (based on past spending) and up to £10bn (based on future spending) on walking, cycling, buses and trams in Britain. In relation to principles 2 and 3, it additionally estimated that:

- Charging an ‘eco levy’ for urban driving in Britain could raise £8bn annually;³¹
- An ‘eco levy’ for driving on England’s Strategic Road Network (i.e. its motorways and trunk roads) could yield another £5bn (TQL propose that this should be used to substantially reduce rail fares);
- A distance-based HGV charge aimed at recouping the costs which HGVs impose on society could yield around £7bn annually;
- The adoption of Land Value Capture for housing (i.e. allowing local authorities to assemble land for housing by buying it at ‘existing use value’, rather than allowing landowners to gain windfall profits from the future increases in the value of their land once developed) would yield around £11bn annually;
- A local payroll levy (similar to the ‘Versement Transport’ levy in France) could yield up to £7bn annually;
- A visitor lodging levy in Britain, based on a flat rate of £2 per overnight stay, could yield £1bn a year;
- A land value uplift levy (i.e. allowing local authorities to raise funds for transport projects by taxing existing landowners based on the increase in the value of their land following the transport project) could yield substantial sums. For instance, a TfL study of the potential for land uplift relating to 8 proposed transport schemes in London worth £36bn could unlock land for development with £24bn, while adding £63bn to the value of existing properties nearby.

In short, the Government should adopt a package of traffic restraint measures that seeks to reduce demand for both longer-distance and urban travel, thereby aiming both to reduce the number and the length of car journeys, while earmarking the proceeds to improve the provision of (and support the use of healthy and sustainable alternatives.

³⁰ <https://policy.friendsoftheearth.uk/insight/transforming-transport-funding-meet-our-climate-targets>

³¹ <https://policy.friendsoftheearth.uk/insight/eco-levy-driving-cut-carbon-clean-toxic-air-and-make-our-towns-and-cities-liveable>

- 1.3. Establish land use planning policies through the forthcoming Planning White Paper to ensure that new developments are located, planned and designed to reduce car-dependence and support active and sustainable travel. Ensure that roads, junctions and cycle routes associated with new development are designed in accordance with the new Cycling Infrastructure Design guidance, and that of suitable cycle parking is provided in all new developments.**

Role of planning system

For decades, planning policies both nationally and locally have paid lip-service to the aims of supporting sustainable transport objectives:

- Planning Policy Guidance note PPG 13, first issued in 1994 and revised in 2001 and in 2011,³² listed “*reduc[ing] the need to travel, especially by car*” as one of its three key objectives.
- Regrettably, England’s 2012 ‘National Planning Policy Framework’ (NPPF) included an unhelpful “presumption in favour of sustainable development”, with “sustainable” being inadequately defined, thereby hampered local authorities’ ability to reject developments in unsuitable locations. Nonetheless, one of its 12 key principles was that planning should “*Actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*”³³

Further revisions were made to NPPF in 2018 and 2019. The current version contains the following admirable-sounding statements:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

Yet, in practice, this is not happening, even in flagship “Garden Communities” developments.

The Garden Communities prospectus,³⁴ issued in 2018 by the Ministry for Housing, Communities and Local Government (MHCLG), says that communities should “*be largely*

³² <https://webarchive.nationalarchives.gov.uk/20120919201915/http://www.communities.gov.uk/documents/planningandbuilding/pdf/1758358.pdf>

³³ www.admin.ox.ac.uk/media/global/wwwadminoxacuk/localsites/estatesservices/documents/ouss/National_Planning_Policy_Framework_2012.pdf

³⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805688/Garden_Communities_Prospectus.pdf

self-sustaining and genuinely mixed-use”, with transport options that will “support economic prosperity and wellbeing for residents. This should include promotion of public transport, walking, and cycling so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services.”

However, an analysis by Transport for New Homes of plans for 20 Garden Communities³⁵ found that:

- All 20 of the Garden Communities examined in detail will encourage car dependent lifestyles with the car the primary mode of transport in every case. These 20 settlements will create up to 200,000 car dependent households.
- Nearly every Garden Village came with largescale investment in strategic and local road capacity to ‘mitigate’ thousands of new car journeys onto the road network – contrary to the notions of ‘self-sufficiency’ and ‘self-containment’. About half of Garden Communities studied were associated with new or bigger motorway junctions. 90% of garden community plans appeared to be associated with road capacity increases, such as dualling roads, enlarging numerous road junctions, new bypasses, fast link roads, and so on. A number of Garden Community locations appear to be actually selected to finance a new bypass or other new ‘strategic’ link. As Transport for New Homes noted, *“This seems to put the cart before the horse!”*
- A popular model for Garden Towns was new estates on a new ring road. This was chosen rather than extending the town along joined up streets for easy walking or cycling into the town centre.
- Only one settlement, Aylesham, offered amenities and a railway station within 1 mile of every home. Even there, the train service is infrequent and there are no safe cycle routes to access it.
- All other settlements failed to provide access to amenities and a railway station within 1 mile of all new homes with safe walking and cycling routes.
- None of the 20 settlements will provide bus services to all households all day, all week.
- Cycle routes from Garden Villages into nearby towns will often be long and dangerous.
- Residents will have to walk up to 7 miles to access a railway station or go to the nearest town centre.

Given that these are supposed to be flagship developments, it is hardly surprising that car-dependence in more routine housing developments is even more entrenched. These problems had previously been documented in an earlier report by Transport for New Homes.³⁶ Its findings can be summarised as follows:

- Housing developments were invariably associated with improvements to road infrastructure – with some housing locations being chosen specifically because they would yield developer contributions to fund road capacity increases. These locations typically provided quick access to the inter-urban road network, rather than proximity to town centres and public transport connections. Indeed, many were advertised as having quick and convenient road access.
- Large areas of land within new developments were given over to road and car parking, with little space left for tree planting, green space or an attractive public realm. This in turn resulted in low residential densities, often as low as 20 dwellings per hectare. (N.B. Low density development is in turn associated with high levels of car dependence,

³⁵ www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf

³⁶ www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf

- because (a) it increases the distances one has to walk or cycle to reach key destinations, and (b) it reduces the density of demand for public transport services³⁷).
- Conversely, good provision for walking, cycling and public transport within developments was the exception rather than the norm. Walking and cycling routes were often out of the way, sometimes being attractive for leisurely walking and cycling but unattractive for use at night or in winter. Bus routes were poorly planned or non-existent.
 - Good walking, cycling and public transport connections to other nearby destinations were even rarer, as this was outside the ‘red line’ of the development. The report identified only one new development (Cranbrook, near Exeter) which had had a new rail station built to serve it – and this had only happened thanks to huge persistence on the part of the local authority officers. This was in stark contrast to the Dutch approach to planning new housing developments.

In short: whilst the ‘fine words’ in national policy may support development that is oriented towards sustainable transport, their stated aim is clearly not being achieved. Indeed, they are evidently failing to prevent a lot of severely car-dependent development.

This situation is not helped by paragraph 109 of the NPPF, which insists that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This makes it very difficult for local authorities to reject developments even if they are expected to generate very significant volumes of additional motor traffic.

As a result, motor-orientated development continues to proliferate, hampering progress in tackling car dependence and the climate and other adverse impacts associated with it. Notable exceptions, such as Leeds’s Climate Innovation District,³⁸ do exist, showing what can be done. Yet the fact that they are exceptional proves the point.

An analysis by KPMG for Greener Journeys³⁹ sought to understand the root causes of these problems, and how they might be addressed. It identified the following problems:

- **Barrier 1:** Statutory responsibility for local public transport, highways and housing is fragmented, particularly in two-tier areas (where a county council is responsible for highways and public transport, but a district council is responsible for planning). This results in siloed plan-making and decision-making.
- **Barrier 2:** National planning guidance is insufficiently clear about the need to plan effectively for sustainable transport in association with new housing developments. This undermines the ability of planning authorities to secure good walking, cycling and public transport provision (or the funding required to provide these facilities).
- **Barrier 3:** Local authorities do not have sufficient long-term funding of their own, to plan strategically and deliver with certainty.
- **Barrier 4:** Current developer contribution mechanisms (section 106 agreements and the Community Infrastructure Levy) do not explicitly capture the uplift in land values associated with high-quality sustainable development, and are therefore insufficient to fund strategic sustainable transport.

³⁷ See www.sciencedirect.com/science/article/abs/pii/S0195925596000236, www.frbsf.org/economic-research/files/ResidentialDensity_Brownstone.pdf and www.researchgate.net/publication/319010918 Examining associations between urban design attributes and transport mode choice for walking cycling public transport and private motor vehicle trips

³⁸ <https://citu.co.uk/citu-places>

³⁹ https://greenerjourneys.com/wp-content/uploads/2019/02/20190213_KPMG-Sustainable-Transport-and-New-Housing-Report-for-TKH_FINAL....pdf

- *Barrier 5:* Current approaches to economic appraisal do not address the climate, air quality, health, well-being and other benefits of integrated sustainable transport (or indeed of good access to green space and a quality public realm).
- *Barrier 6:* The design, pattern and location of new housing development often preclude sustainable transport provision. Issues include pressure on planning authorities to accept large development sites in unsustainable locations (to meet housing targets), or to locate development on the edges of towns, where they have good road access but are disconnected from town centres (e.g. where they are separated by ring roads) or from rail and bus stations.

Its recommendations were therefore as follows:

Funding and incentives

1. Current capital and revenue funding for local transport and complementary policy areas should be consolidated into a longer-term, devolved budget to local authorities to enable them to plan and invest on a more strategic basis.
2. Local authorities should be empowered to capture a greater share of the increased land value resulting from changes in the use of land and public investment in high-quality sustainable transport, in order to help raise the overall level of investment in sustainable transport.
3. Local authorities should be provided with the resources to fund the staff capacity and capability that are necessary to plan strategically.

Policy and Plan-making

4. Forthcoming National Planning Policy Guidance should clarify expectations for sustainable transport provision with new development and provide local authorities with the necessary backing to put policy into practice (n.b. these recommendations predate the 2019 NPPF update).
5. Local authorities should develop spatial plans that integrate planning for transport, housing and employment land, and where appropriate over a single economic geography (n.b. more recent proposals to consider replacing two-tier authority arrangements with unitary authorities could facilitate better integration of land-use and transport planning, as KPMG / Greener Journeys propose).
6. The potential benefits of integrated sustainable transport and housing development are considered at the earliest stages of the plan-making process and appraised holistically in terms of their economic, social and environmental impacts when determining value for money.
7. Sustainable transport provision should be designed-in from the outset in order to support the introduction of public transport services.
8. Local authorities and transport providers should work collaboratively to deliver innovative and cost-effective sustainable transport solutions for new housing.

The ongoing consultation on the Government's Planning White Paper is clearly an important opportunity to address these issues. We assume though that the Transport Decarbonisation Plan is likely to be published before the Government has decided on its response to the Planning White Paper consultation. We therefore urge that it should include the following commitments:

- Decisions about development sites (and particular the proposed categorisation of locations into "Growth areas" suitable for substantial development, "Renewal areas" suitable for more limited development, and "Protected areas") should be informed by an Environmental Assessment process which takes full account of the CO₂ and other

anticipated impacts of travel (environmental, health etc) associated with the development. Planning authorities should have a clear mandate to refuse planning applications in locations that are likely to end up being car-dependent (i.e. which lack good access to public transport and are not within cycling and walking distance of other key trip generators), unless the development will include provision for good public transport and for local services and amenities *from the outset*. Exceptions to this rule should not be made on the basis that road improvements can be secured, either through developer contributions or through other funding sources.

- The process for securing developer contributions should fully capture the increased value of the land to be developed. It should secure the funding for whatever sustainable transport provision is needed to prevent the development becoming car-dependent.
- The planning and design of road and other infrastructure within the development should seek to maximise the use of walking, cycling, public transport and car-sharing or ride-sharing arrangements. Provision for parking of private cars should be minimised accordingly.
- New developments should incorporate cycling and walking networks which meet the criteria of being 'coherent', 'direct', 'safe', 'comfortable' and 'attractive', as set out in the Government's new Cycling Infrastructure Design guidance. Roads, streets and cycle routes within developments, and connections to other key destinations nearby, should be designed or redesigned in accordance with that guidance. Local streets should be designed on the assumption of a 20mph speed limit.
- Ample cycle parking provision should be made at all developments (including residential developments), for both their occupants (e.g. residents or employees, as appropriate) and for visitors.

2. FUNDING

2.1. **Shift the balance of transport spending away from investment in new road capacity and towards active and sustainable transport as well as measures to reduce travel demand (e.g. broadband investment, car-sharing or lift-sharing initiatives), in line with the above targets for road traffic reduction and shift in transport modes.**

As shown in section 1, UK transport policy lacks clear objectives and targets that are in line with the environmental imperatives of tackling climate change, or indeed air pollution, road safety and other critical issues. Still less does it have an evidence-base for deciding how transport funding should be allocated in accordance with those objectives.

Specifically in relation to cycling, the targets for increased cycling and walking in the Cycling and Walking Investment Strategy (and indeed in previous national cycling strategies) have been plucked out of thin air, based on what seems desirable and achievable. There is no science behind them, no linkage with any over-arching traffic reduction targets (let alone any wider GHG reduction or other targets).

In section 1 we urged that targets should be set for road traffic reduction and for increases in sustainable alternatives (including not travelling at all, as well as walking, cycling, public transport etc). We additionally urge that these targets should then be used to determine the allocation of transport funding in the forthcoming Comprehensive Spending Review.

2.2. Publish the ‘Cycling Insights’ report, updating it as required in the light of the above road traffic reduction targets and the corresponding increases in use of cycling and other active and sustainable transport. Allocate capital and revenue funding accordingly.

More positively, the Government has now commissioned research to determine the funding and other measures needed to meet its CWIS targets (even though the targets themselves are still of questionable validity). However this research remains unpublished, despite a commitment to do so.⁴⁰

Yet the principle established here is a good one, and should be more widely applied. There should be a clear, objective rationale allocating transport funding to different aspects of transport policy, so that the overall funding package is aligned with policy objectives that are “led by the science”, particularly in relation to the decarbonisation of transport.

We strongly suspect that applying this principle will highlight the need for significantly increased funding for the Government’s 2nd Cycling and Walking Investment Strategy (due to be adopted following the Comprehensive Spending Review later this year), and a reduction in the £27bn earmarked for the 2nd Roads Investment Strategy. We do not believe the current balance of funding properly reflects the adverse impacts of road investment, nor the benefits provided by cycling and walking investment.

We welcome the fact that the £2bn for active travel between 2020/1 and 2024/5 represents a 6-fold increase in earmarked funding for cycling and walking. However we are pretty sure it is only about a quarter to a third of what is needed even to meet the Government’s existing Cycling and Walking Investment Strategy (CWIS) targets to double cycling trips and to increase walking, let alone the much more ambitious targets that will be needed to support the wider objective of a ‘net zero’ transport system. In short, we believe the amount needed over the next 5 years is nearer £8bn than £2bn, particularly if the Government wants to boost cycling and walking in line with its “levelling up” agenda (as we explain in section 6).

Finally, we urge that at least 20% and up to 30% of whatever funding is allocated to cycling and walking should be revenue funding. The lion’s share of cycling and walking investment should be capital funding to improve cycling and walking infrastructure: primarily for the implementation of Local Cycling and Walking Infrastructure Plans (LCWIPs) and Low Traffic Neighbourhoods / 20mph schemes, but also for public realm improvements, cycling and walking provision along and across Strategic / Major Road Network corridors, similar provision along and across the HS2 corridor, cycle-rail improvements and the establishment of bike share schemes. Nonetheless, some additional revenue funding is needed for cycle training and other behaviour change projects for people of all ages, backgrounds and abilities, as well as for Active Travel England and for professional support programmes. Section 6 will explain how revenue-funded behaviour-change programmes can help maximise benefits of boosting cycling particularly among individuals and demographic groups whose health, wealth and well-being has the most to gain from taking up cycling, but who are least likely to do so without additional support.

⁴⁰ www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2020-05-20/49717/

3. INFRASTRUCTURE FOR CYCLING

- 3.1. Ensure that the Government's new 'Cycling Infrastructure Design' guidance is consistently applied in all highway and traffic schemes, and in all new developments, by establishing the proposed Active Travel England as quickly as possible, and ensuring it is adequately resourced for its intended role. Meanwhile, strengthen existing programme of support for local authorities to develop and implement Local Cycling and Walking Infrastructure Plans (LCWIPs), and develop suitable professional training programmes.

Importance of the new Cycling Infrastructure Design guidance

Cycling UK has strongly welcomed the Government's new Cycling Infrastructure Design guidance (Local Transport Note LTN 1/20), which was published in July 2020, along with the 'Gear Change' vision statement and a consultation on new Highway Code rules.⁴¹

We had previously welcomed the Local Cycling and Walking Infrastructure Plan (LCWIP) process and guidance,⁴² launched in 2017. This was important, as it encouraged local authorities to plan cycling and walking *networks*, rather than disconnected routes and facilities that did not necessarily go to and from where people wanted to go, were poorly joined up and often gave up at the places where they were most needed.

We strongly support the new guidance's emphasis on quality (with protected cycle lanes being the required form of provision on faster or busier main roads) as well as its requirements for cycle networks to be 'coherent' and 'direct' – as well as being 'safe', 'comfortable' and 'attractive'. However, the LCWIP process has until now been underfunded, and backed by guidance that was both weak and discretionary. We are pleased that this now looks set to change.

The new guidance is not only a vast improvement on its predecessor, but there is now a much stronger incentive for local authorities to adhere to it. The ministerial Foreword to the design guidance states that *"It will be a condition of any future Government funding for new cycling infrastructure that it is designed in a way that is consistent with this national guidance"*, and that DfT will *"reserve the right to ask for appropriate funding to be returned for any schemes built in a way which is not consistent with the guidance"*. It adds that *"To receive funding for local highways investment where the main element is not cycling or walking, there will be a presumption that schemes must deliver or improve cycling infrastructure to the standards in this Local Transport Note, unless it can be shown that there is little or no need for cycling in the particular highway scheme."*

This emphasis on embedding the new guidance in the planning and design of all highway and traffic schemes is very welcome. It builds on the Department's updated guidance on local authorities' Network Management Duty, issued under the Traffic Management Act 2004.⁴³ Issued during lockdown, this makes it a legal duty for highway authorities to consider measures such as 'pop-up' cycle lanes, as well as more permanent measures identified through the LCWIP process, including whole-route approaches to cycle provision, 20mph and 'school streets' schemes, 'modal filters' (to reduce rat-running, while permitting cycling), pedestrian and cycle zones (e.g. in town centres), cycle parking at key destinations, changes to junction designs.

⁴¹ See references 3, 4 and 5

⁴² www.gov.uk/government/publications/local-cycling-and-walking-infrastructure-plans-technical-guidance-and-tools

⁴³ www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19

The challenge now is to overcome lack of capacity and skills needed to put the new guidance into practice. Cycling has been under-prioritised and under-funded for decades with the result that, until recently, most highway authorities lacked not only a cycling network plan but also the staff capacity and skills to draw up a cycle network plan, let alone the technical skills to design and implement cycle routes or to design other highway schemes in a cycle-friendly manner. This will not change overnight.

In section 2.1, we welcomed the fact that the £2bn allocated for cycling and walking in the next 5 years amounts to a 6-fold increase in dedicated funding for active travel, while adding that we do not believe it is enough to meet its own targets to double cycling and increase walking by 2025. We understand that the Government's own unpublished research shows that the amount needed is at least £6bn, and more like £8bn if it wishes to maximise the health and economic benefits of meeting these targets in a way that accords with its 'levelling up' agenda.

Yet we also recognise the Treasury's concern that local authorities may struggle to spend even the £2bn currently allocated, let alone the substantially higher figure we believe is still needed to meet the Government's targets. However, if their fears are correct, it follows that these targets will be missed. Given that active travel is a Prime Ministerial priority, we strongly urge action to prevent this from happening.

As well as increased funding for cycling and walking (as called for in section 2.1), we therefore urge two further actions to ensure the funding is well spent.

Active Travel England

The first is to set up Active Travel England as soon as possible, and ensure it is resourced to fulfil the role allotted to it in the 'Gear Change' vision document.

'Gear Change' ascribes significant responsibilities to Active Travel England. It says:

"Active Travel England will examine all applications for funding and refuse any that are not compliant with the new national standards. It will inspect finished schemes and ask for funds to be returned for any which have not been completed as promised, or which have not started or finished by the stipulated times. [It will] also begin to inspect, and publish annual reports on, highway authorities, whether or not they have received funding from us, grading them on their performance on active travel and identifying particularly dangerous failings in their highways for cyclists and pedestrians."

Other statements relating to Active Travel England's role include:

"Active Travel England's assessment of an authority's performance with respect to sustainable travel outcomes, particularly cycling and walking, will be taken into account when considering funding allocations for local transport schemes."

"One of Active Travel England's functions will be as a statutory consultee within the planning system to press for adequate cycling and walking provision in all developments of over a certain threshold, and provide expert advice on ways in which such provision can be improved."

"The commissioner and inspectorate will ... perform a similar role to Ofsted from the 1990s onwards in raising standards and challenging failure."

The sooner Active Travel is set up and able to fulfil these roles, the more likely it is that the funding needed to meet the Government's cycling and walking targets can be allocated, spent, and spent well in accordance with the Cycling Infrastructure Design guidance.

The LCWIP strategic support programme and professional training

In the meantime, we urge the Government to invest some of the £2bn into expanding the existing LCWIP strategic support programme, including professional training. The LCWIP strategic support programme has been delivered for the past 3 years, alongside an LCWIP technical support programme. It was (and continues to be) delivered by a Sustrans-led consortium which also includes Cycling UK and Living Streets. It has helped local authorities to exchange best practice in planning LCWIPs, to make the strategic case for funding their LCWIPs (both internally and externally to funders such as Local Enterprise Partnerships), and to integrate their LCWIPs into other plans and policies (e.g. their local transport plans, local plans or spatial development strategies).

We further propose that professional training should be arranged, either as part of or alongside the strategic support programme, particularly to disseminate awareness of the new Cycling Infrastructure Design guidance. Modules could include:

- Understanding and implementing the new Cycling Infrastructure Design guidance – including a short module for Councillors and senior managers, and a more in-depth version for practitioners;
- Cycle and pedestrian network planning;
- Making the economic case for cycling and walking investment;
- Consultation and stakeholder engagement (including handling 'bikelash' objections);
- Low traffic neighbourhoods;
- Inclusive cycling – broadening the diversity (as well as the numbers) taking up cycling;
- New developments.

3.2. Ensure that Highways England and HS2 Ltd act as models of good practice in consistently adhering to (or exceeding) the standards set out in the new Cycling Infrastructure Design guidance

The Secretary of State is the sole shareholder in two companies whose role is to deliver major national transport infrastructure projects, namely Highways England and HS2 Ltd. Given that Ministers are now expecting local authorities to consistently apply DfT's new cycling design guidance, it is clearly important that both companies consistently exemplify best practice. Unfortunately neither has been doing so in recent years. Ministers therefore need to insist that this is remedied.

Highways England

Highways England adopted some very good cycling infrastructure design standards in 2016⁴⁴ (n.b. these have since been revised⁴⁵). Unfortunately, some of Highways England's regional offices have not been adhering to them. For instance, Highways England's East of England division has cited some lax wording in the 2016 design standard as a pretext for opting to build cycle tracks associated with the A14 Cambridge to Huntingdon and the A428 Black Cat to Caxton Gibbet schemes to a previous standard which fails to ensure cycle safety and priority at junctions. Meanwhile its southern division has failed to uphold

⁴⁴ www.itf-oecd.org/sites/default/files/docs/safe-micromobility_1.pdf, see Table 3

⁴⁵ www.standardsforhighways.co.uk/dmrb/search/5bb8f60c-737b-49f8-8c40-522a49038eff

the new standard when dealing with a planning application adjacent to the A27 near Shoreham (Sussex), which involved the removal of a very good (and well used) cycle crossing and its replacement by a more indirect crossing that is wholly substandard.

We urge a ministerial direction to Highways England to revise its standards, clarifying that cycle tracks should be designed to standards that are suitable for cycling, and that the standards should be applied consistently in all schemes (including developer-funded schemes), not just those which specifically relate to cycling.

HS2 Ltd

During the passing of the HS2 Phase 1 Bill (now Act, covering the HS2 route section from London to the West Midlands), Cycling UK (which was then still known formally as the Cyclists' Touring Club) petitioned for and secured various legally-binding Assurances.⁴⁶ Some of these related to minimising the safety risks of road freight, including the use of 'direct vision' lorries (see section 4.4). Another effectively promised consultation with DfT's 'Cycle Proofing Working Group' (CPWG, of which Cycling UK is a member⁴⁷) on ensuring that best-practice design guidance was consistently applied in the planning and design of both temporary and permanent changes to highways and rights of way associated with the HS2 scheme. Unfortunately the latter has not happened.

In October 2017, members of the CPWG learnt that HS2 had adopted a 'Technical Standard' for highways and rights of way a year beforehand, without reference to CPWG, and had even revised it twice in the meantime. When we obtained a copy (it was not and still is not publicly available), it turned out to be worse even than DfT's old (and now superseded) Cycling Infrastructure Design guidance from 2008. Yet HS2 Ltd has been insisting that schemes, which it had started designing in accordance with its Technical Standard, could not be revised in accordance with other best practice guidance (which then included the London Cycling Design Standards and the Welsh Government's Active Travel guidance).

Yet this situation could still be rescued. By chance, Cycling UK presented our petition to the Lords Committee scrutinising the HS2 Phase 2a Bill (covering the route from the West Midlands to Crewe) on the same day that DfT published its new Cycling Infrastructure Design guidance. During our evidence session, HS2 undertook to consult with Cycling UK on revising its technical guidance in the light of DfT's new guidance. We therefore hope HS2 Ltd will now act on that assurance in good faith. Having done so, we also hope HS2 will apply its revised guidance as fully as possible to Phase 1 of the scheme, as well as Phases 2a and 2b,

3.3. Ensure that highway maintenance funding and procedures take account of cycle and pedestrian safety, e.g. by urging highway authorities to seek to improve cycling conditions when carrying out planned highway maintenance works (e.g. when resurfacing roads or carrying out bridge strengthening work).

One factor affecting the safety of cycling (and indeed of walking) is the poor maintenance condition of local roads and pathways, due to many years of underfunding. Whilst highway maintenance defects can adversely affect all road users, cyclists are disproportionately vulnerable to serious or even fatal injuries:

⁴⁶ www.gov.uk/government/publications/high-speed-rail-london-west-midlands-bill-register-of-undertakings-and-assurances

⁴⁷ www.gov.uk/government/groups/cycle-proofing-working-group

- ‘Poor or defective maintenance’ was recorded by the police as a ‘contributory factor’ to 368 incidents in which cyclists were seriously injured and 22 were killed on Britain’s roads between 2007 and 2016.⁴⁸ Around 12% of the legal claims handled by Cycling UK’s solicitors on behalf of our members are due to poor maintenance.
- A Cycling UK investigation found that the average pay-out for a successful maintenance-related damages claim is 13 times higher for cyclists than for drivers – and that is without including their own (significantly greater) legal costs. This is doubtless because cyclists’ claims, and indeed those from pedestrians, are much more likely to involve serious injury, whereas motorists’ claims are more typically for property damage only.⁴⁹
- Total spending by English highway authorities on road maintenance in 2016/7 was £3.63bn. It has recovered somewhat in recent years, having fallen sharply from £4.19bn in 2008/9 in 2009/10 to £3.46bn in 2013/4. However, spending on minor roads (i.e. ‘B’, ‘C’ and unclassified roads) has continued to decline: from £2.51bn in 2009/10 to just £1.87bn in 2016/7. The proportion of maintenance spending on minor roads has thus fallen markedly, from 60% in 2009/10 to just 51% in 2016/7.⁵⁰
- This is despite evidence that cuts to road maintenance budgets have significantly higher disbenefits on local roads (where pedestrian and cycle traffic is disproportionately concentrated) than on trunk roads. A £1 maintenance cut for local roads has an economic cost of £1.67, compared with just £1.12 for trunk roads.⁵¹

Cycling UK therefore believes that, alongside a shift of transport funding from national roads spending towards local sustainable transport solutions, a parallel shift is needed towards maintaining existing highways, and particularly the local road and path network.

The Code of Practice on ‘Well Managed Highway Infrastructure’⁵² should be revised to include references to the following factors that should be taken into account in assessing the risks a pothole poses to cyclists: (i) its position relative to the edge (or the effective edge) of the road; (ii) its alignment (i.e. whether it runs parallel to or across a cyclist’s line of travel, and thus the likelihood of it trapping a cyclist’s wheels); (iii) whether it is at or near a junction, particularly a major or complex junction; and (iv) whether it is on a gradient. Awareness of these issues should be incorporated into professional training for highway inspectors. Instrumented bicycles should be used to assess the evenness of road surfaces.

The safety of cycling should also be taken into account in setting up temporary traffic management arrangements when carrying out road and street works, e.g. to prevent cyclists being endangered by unsafe diversions, narrow lanes, ‘shuttle’ traffic lights with insufficient time for cyclists to get through a single-lane section of road, metal plates (which can be dangerous when wet), and grit or debris.

We also urge that highway maintenance guidance should mandate highway authorities to consider opportunities to improve conditions for walking and cycling when carrying out planned highway maintenance works (e.g. full resurfacing of a carriageway). This can be a very cost-effective opportunity to introduce widened cycle lanes or tracks, coloured surfacing and/or ‘light segregated’ cycle facilities using ‘traffic wands’ (i.e. plastic bollards used to create a protected cycle lane) and planters, at a time when the road is already being closed and a work-gang is already due to be on site.

⁴⁸ www.theyworkforyou.com/wrans/?id=2018-02-22.129317.h

⁴⁹ www.cyclinguk.org/press-release/156-local-authorities-spend-total-ps433-million-pothole-claims

⁵⁰ www.gov.uk/government/uploads/system/uploads/attachment_data/file/674332/rdc0310.ods

⁵¹ <https://trl.co.uk/sites/default/files/MISO10%20-%20Making%20the%20case%20for%20road%20maintenance%20spend%20in%20a%20competitive%20budget%20environment.pdf>

⁵² www.ukroadsliaisongroup.org/en/codes/

For more on these issues, see Cycling UK's briefing on highway maintenance,⁵³ and its submission to the Commons Transport Committee's inquiry on Local Roads Funding.⁵⁴

3.4. Integrate the Local Cycling and Walking Infrastructure Plan (LCWIP) and Rights of Way Improvement Plan (RoWIP) processes, to connect urban and rural cycling and walking networks, supported by access funding opportunities from the Agriculture and Environment Bills currently before Parliament.

We have previously noted Cycling UK's strong support for the Local Cycling and Walking Infrastructure Plan (LCWIP) process. However we are concerned that funding constraints may in practice lead to an urban focus in delivering LCWIPs, with more rural areas missing out. The Agriculture Bill and the Environment Bill, which are currently before Parliament, provide a potential opportunity to address this.

In essence, these two Bills respectively put in place the processes and the priorities which will determine how agricultural subsidies are allocated following the UK's departure from the European Union's Common Agricultural Policy (CAP). During Michael Gove's time as Environment Secretary, he adopted the principle that agricultural subsidies should be used to procure environmental benefits - "public goods for public subsidies" - and that these public goods should include public access.

This principle has already been written into clause 1 of the Agriculture Bill, which lists "*supporting public access to and enjoyment of the countryside...*" among the purposes for which the Secretary of State may allocate agricultural subsidies. However there is no reference to public access in clause 1 of the Environment Bill, which lists the "key priority" areas for which the Secretary of State must adopt at least one long-term target. Moreover, the Government's draft proposals for its Environmental Land Management (ELM) scheme,⁵⁵ which is intended to give effect to the "public goods for public subsidies" principle, contains virtually nothing about public access.

Cycling UK and its allies (e.g. Sustrans, the Ramblers and others) are concerned that an opportunity is being missed to strengthen the Rights of Way Improvement Plan (RoWIP) process, and to integrate it better with the LCWIP process. By doing so, it would be possible to connect up the (largely urban and utility-focussed) LCWIP networks with the (largely rural and recreation-focussed) rights of way networks, extending the former out into their surrounding rural hinterlands, and blurring the distinction between them. It would, for instance, enable school pupils in outlying villages to walk or cycle to schools in nearby towns using the rights of way network, as well as enabling families in those towns to go out for walks or cycle rides in the surrounding countryside without having to drive to get there.

Achieve this integration between urban and rural LCWIPs and RoWIPs will require post-Brexit agricultural funding to be focussed on overcoming 'missing links' particularly in 'urban fringe' areas. This is where the RoWIP network is most likely to be used for day-to-day (as well as recreational) journeys, and hence to require lighting and surfacing to standards which allow its use in all weathers and at all times of the year.

The experience of lockdown has really heightened awareness of the health and wellbeing benefits of access to nature. Cycling UK strongly urges the Government to seize the opportunity to boost the opportunities for access to nature, while at the same time

⁵³ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/highway-maintenance

⁵⁴ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/transport-committee/local-roads-funding-and-governance/written/90786.html>

⁵⁵ https://consult.defra.gov.uk/elm/elpolicyconsultation/supporting_documents/ELM%20Policy%20Discussion%20Document%20230620.pdf

increasing the opportunities for safe day-to-day cycling away from the road network, using the rights of way network. At present, only 22% of England's rights of way network carries rights for cycling – and that 22% is not necessarily the parts that are most suitable, it is merely the parts for which there is past evidence of use by horses and/or carriages! It is time we seized the opportunities of post-Brexit agricultural subsidies to provide real benefits for our health, for rural local economies and for the climate.

4. OTHER SAFETY MEASURES

4.1. Reduce the 'default' speed limits, to (a) 20mph for built-up streets; and (b) no more than 40mph for non-built-up single carriageways.

We have explained in section 3 that, to create the conditions where cycling becomes a normal activity for people of all ages, backgrounds and abilities - including women, children, older people with disabilities – we either need to separate cyclists from motor vehicles or ensure that they can mix safely with light volumes of traffic travelling at low speeds.

Lowering speed limits can reduce road casualties, both by reducing the severity of crashes and by increasing the likelihood that a crash can be averted altogether, with the risk of a crash reducing by 2-7% for every 1mph reduction in average speeds.⁵⁶ The risk of a pedestrian injury proving to be fatal drops from 5.5% at 30mph to 1% at 20mph.^{57 58} 20mph limit programmes in Calderdale⁵⁹ and Portsmouth⁶⁰ both achieved a 22% reduction in all casualties, while Fife recorded a 34% reduction in total casualties, a 28% reduction in child casualties and a 26% reduction in casualties in the most deprived areas.⁶¹ Bristol's 20mph limits achieved a 40% reduction in cyclist casualties.⁶²

Lower speed limits can also help reduce CO₂ and pollutant emissions⁶³, either directly or indirectly. In Germany, drivers using 30kmh (18.6mph) streets have been found to change gear 12% less often and to brake 14% less, thereby directly reducing fuel consumption by 12%.⁶⁴ However lower speed limits can also indirectly achieve emissions reductions by enabling more people to walk and cycle, thereby reducing motorised traffic. Bristol's 20mph limits were found to have increased cycling by 20.5% and walking by 23%. This in turn resulted in increased physical activity, as well as reduced pollution and casualties, benefits which were found to be worth £7.47 (cycling) and £24.72 (walking) respectively.⁶⁵ It is for these reasons that 20mph limits are advocated in several guidance notes from NICE (the National Institute for Health and Care Excellence),⁶⁶ as well as being strongly supported by Public Health England,⁶⁷ the Faculty of Public Health,⁶⁸ the Royal College of Paediatrics and Child Health⁶⁹ and the British Medical Association.⁷⁰

⁵⁶ <https://trl.co.uk/reports/TRL421>

⁵⁷ www.sciencedirect.com/science/article/abs/pii/S0001457510001077?via%3DiHub

⁵⁸ <https://pubmed.ncbi.nlm.nih.gov/24144499/>

⁵⁹ www.calderdale.gov.uk/nweb/COUNCIL.minutes_pkg.view_doc?p_Type=AR&p_ID=47348

⁶⁰ www.cyclinguk.org/sites/default/files/document/migrated/news/speed-limits-portsmouth.pdf

⁶¹ http://publications.fifedirect.org.uk/c64_PDF-SC-210116.pdf

⁶² www.whatdotheyknow.com/request/148770/response/367710/attach/2/Cycling%20City%20end%20of%20project%20report.pdf

⁶³ www.monash.edu/muarc/our-publications/muarc276

⁶⁴ Hass-Clau, C. *An illustrated guide to traffic calming*. Friends of the Earth, 1990 (not online).

⁶⁵ www.bristol20mph.co.uk/wp-content/uploads/2016/06/Cabinet-Report-26th-July-2012.pdf

⁶⁶ See www.nice.org.uk/guidance/ph31, www.nice.org.uk/guidance/ng90 and www.nice.org.uk/guidance/ng70

⁶⁷ www.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf

⁶⁸ www.fph.org.uk/media/1809/transport-and-health-position-statement_2018.pdf

⁶⁹ <https://stateofchildhealth.rcpch.ac.uk/wp-content/uploads/sites/2/2020/03/SOCH-ENGLAND-02.03.20.pdf>

⁷⁰ www.cycling-embassy.org.uk/sites/cycling-embassy.org.uk/files/documents/healthytransporthealthyvives.pdf

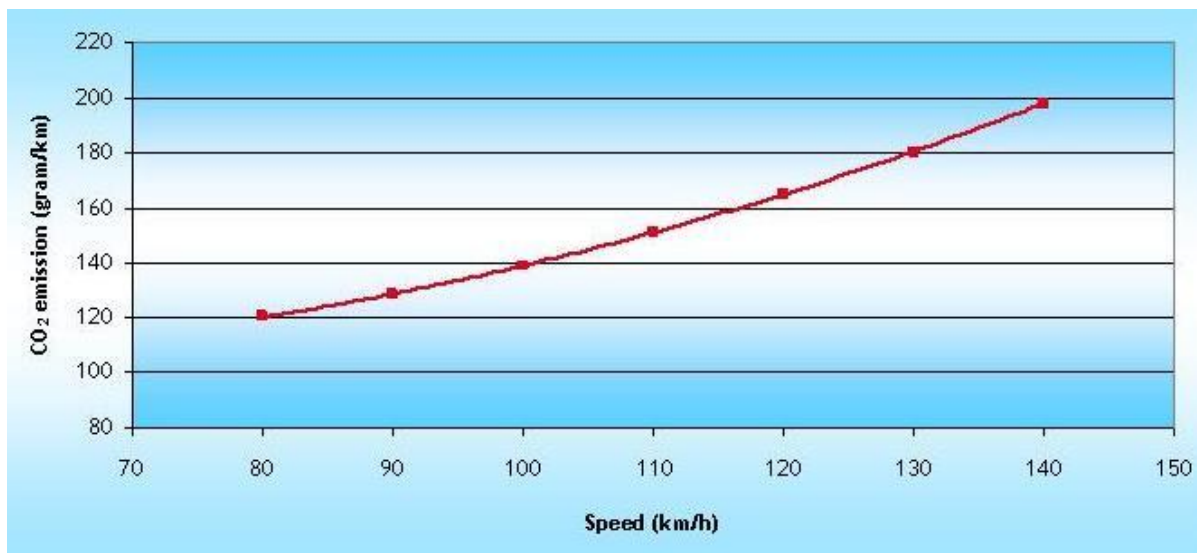
The National Heart Forum has supported the adoption of 20mph as the ‘default’ speed limit for built-up streets, in a position paper also supported by the Association of Directors of Public Health and others.⁷¹ This stance is also supported by Cycling UK and its allies in the Walking and Cycling Alliance⁷² and many other groups. In Wales, Public Health Wales⁷³ has led calls for a 20mph ‘default’ limit.

The Welsh Government has responded by adopting this position,⁷⁴ supported by the Senedd.⁷⁵ 20mph will therefore replace 30mph as the ‘default’ limit in Wales for built-up streets with street-lighting – i.e. it will become the limit that applies unless road signs indicate otherwise (e.g. a limit of 30mph or higher). Since 20mph limits are (rightly) expected to apply to around 65-85% of the length of the urban street network, it surely makes sense to concentrate the speed limit signs on the vehicle-dominated main roads rather than on residential streets where they are more visually intrusive.

There are, however, legitimate concerns about roads where existing speeds are significantly above 20mph. These are typically wider and straighter roads, which do not feel like 20mph streets, where the simple introduction of a 20mph limit is therefore unlikely to be ‘self-enforcing’. To address this, Welsh Councils will be given time to identify such roads in their area, and to decide whether these roads should remain as 30mph (or higher) roads (i.e. whether they should be exceptions to the general rule), or whether they should be redesigned these streets in a way that more naturally enforces the 20mph limit.

Cycling UK believes that adopting a similar policy in England would strongly complement the Government’s enthusiasm for Low Traffic Neighbourhood schemes (as expressed in its ‘Gear Change’ vision), which we wholeheartedly share. It would also be popular: 72% of the public supports 20mph limits for residential streets, with just 14% against.⁷⁶

We also advocate a similar approach to lowering speed limits on non-built-up single carriageways. This would, if anything, have even larger CO₂ reduction benefits, given the relationship between CO₂ emissions and speeds.



Source https://www.ce.nl/publicatie/why_slower_is_better/948

⁷¹ www.adph.org.uk/wp-content/uploads/2013/08/NHF_PositionStatement20mph_2010.pdf

⁷² www.sustrans.org.uk/media/3693/3693.pdf

⁷³ www.wales.nhs.uk/sitesplus/documents/888/Position%20Statement%20Background%20Paper%20-%2020mph%200b.pdf

⁷⁴ www.bbc.co.uk/news/uk-wales-politics-48188233

⁷⁵ <https://seneddhome.com/2020/07/senedd-says-twentys-plenty/>.

⁷⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/905905/ntas0601 ods.

As with urban streets, it seems odd that lower speed limits are treated as the exception when they would be justified on the vast majority of the rural single-carriageway road network. Many narrow country lanes have 60mph limits by default, even though this is often an obviously unsafe limit. Hence it would similarly make more sense to lower the 'default' limit for non-built-up single carriageways to a speed that was safer for pedestrians, cyclists and equestrians, while allowing highway authorities to retain or adopt higher limits on the minority of non-built-up single carriageways with relatively high traffic flows (i.e. on wider and straighter main-road single-carriageways).

For both built-up and non-built-up speed limits, we support the use of average-speed camera systems to facilitate enforcement.

**4.2. Strengthen driver awareness of cyclists' safety needs and how to respect these, by:
(a) incorporating cycle training into the processes for driver training and testing;
and (b) mounting public awareness campaigns, notably to communicate the current draft Highway Code rule changes.**

Respect for the rules of the road, by all road users, is important to give people the confidence to take up cycling, and to prevent them suffering intimidation that can deter them from continuing.

Securing respect for the rules of the road requires a combination of education and enforcement, as has been shown by half a century's experience of tackling drink driving. Education is needed to raise awareness of the rules and why they matter. This improves compliance as well as building public support for enforcement activity. But the enforcement activity is also necessary to ensure that educational messages are not undermined by those who ignore them. Those who continue to behave irresponsibly must be seen to face appropriate sanctions.

Integrating cycle training into driver training and testing processes

One way to boost cycle awareness among drivers, as well as to boost cycle use directly, is to make cycle training integral to the driver training and testing process.

Cycling UK strongly supports the commitment in the Government's 'Gear Change' vision to make cycle training available to adults and teenagers, as well as younger children. We would further advocate that all learner drivers should be encouraged to undertake cycle training to level 3 of the Government-backed National Standard for cycle training. More specifically, level 3 cycle training should be compulsory for driving instructors and all other professional drivers (with suitable alternatives for people with disabilities that prevent them from cycling).

The driving theory test should examine candidates' awareness not only of the rules of the road but also the reasons behind them; while both the theory and hazard perception tests should examine their awareness of how to respect cyclists' safety.

Cycling UK supports the principle of 'graduated driver licencing'. This system sets a minimum period or a minimum amount of learning time before candidates can take their test, with provisional restrictions (e.g. on carrying passengers at night) for a period after passing.

The Government should also consider periodic driver retesting, including professionally administered sight tests, particularly for older drivers.

Disqualified drivers, those who have accumulated 12 penalty points, and those convicted of serious driving offences, should take a compulsory re-test linked to remedial training.

The Highway Code

Cycling UK strongly welcomes the current consultation on revisions to the Highway Code, aimed at improving safety pedestrians and cyclists, particularly at junctions and crossing points. However, if and when these new rules are adopted, it will be essential to ensure drivers are made aware of them. The Government must therefore make provision for a significant public awareness campaign, cover the proposed new rules on:

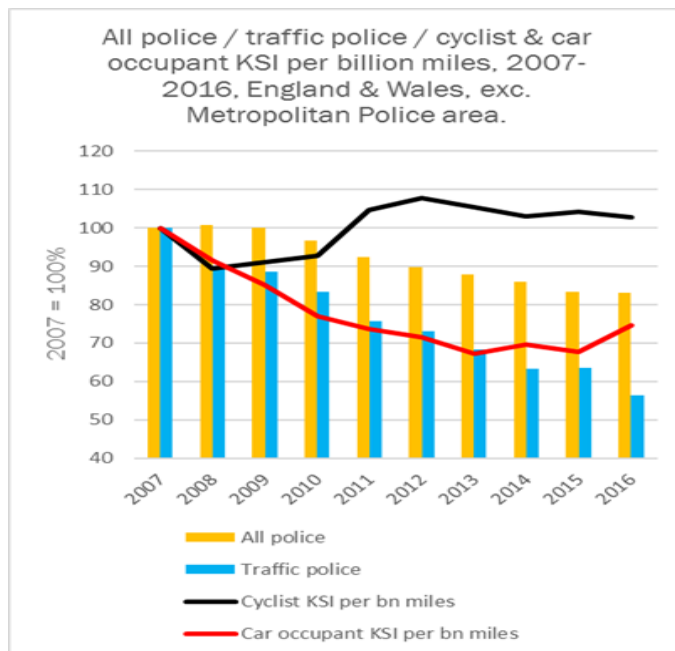
- Pedestrian and cyclist safety and priority at junctions;
- Leaving ample space when overtaking cyclists and equestrians;
- Opening car doors safely using the ‘Dutch Reach’ – i.e. using the hand on your opposite side to the door you want to open (e.g. using your left hand to open a door on your right) – making you turn your head so that you are more likely to see an approaching cyclist;
- Why cyclists are trained to position themselves in the centre of their lane in certain situations (rather than near the left hand side of the road), and why is important for drivers to respect this.

4.3. Strengthen road traffic law and its enforcement by: (a) boosting the priority and resourcing of roads policing and other enforcement bodies (e.g. the Traffic Commissioners, Health and Safety Executive); and (b) carrying out a comprehensive review of road traffic offences and penalties, including the definitions of ‘dangerous’ and ‘careless’ driving.

Roads policing and other enforcement bodies

Visible roads policing is known to be a highly effective road safety measure – evidence on this point has been well summarised in a recent report on roads policing by the Parliamentary Advisory Council on Transport Safety (PACTS).⁷⁷ This is because the fear of being caught influences people’s driving standards far more than the severity of the ensuing punishments.⁷⁸

Despite this, roads policing has faced disproportionate cuts in recent years. The number of traffic officers in England and Wales outside the Met Police area fell by 48% between 2007/8 and 2016/7, a far greater drop than the 17% fall in total police numbers over this period.⁷⁹



⁷⁷ www.pacts.org.uk/wp-content/uploads/Roads-Policing-Report-FinalV1-merged-1.pdf

⁷⁸ <https://etsc.eu/how-traffic-law-enforcement-can-contribute-to-safer-roads-pin-flash-31/>

⁷⁹ We have excluded the Met Police because, unlike other forces, they reported a huge rise in traffic police numbers between 2013/14 and 2014/15 (up from 264 to 1,433). However, we found that this was largely due to a ‘reclassification’ of roles, rather than a genuine rise in the numbers of roads police officers. When combined with other forces’ figures, this gave the misleading impression that overall road policing numbers had risen by c20% between 2013/14 and 2014/15. Data sources: Home Office. *Police*

Cycling UK, PACTS and other road safety groups suspect this may explain, at least partly, why a long-term downward trend in road casualty numbers has recently halted, while serious cycle and motorcycle casualty numbers have now started rising.

Roads policing should thus be prioritised in national governments' policing strategies, e.g. the 'Strategic Policing Requirement' for England and Wales. Police and Crime Commissioners and individual police forces would then have the backing to allocate the resources that roads policing needs and deserves.

Road policing is an important deterrent, but it also ensures crashes are investigated effectively. Well-resourced and well-trained roads police officers are also important for improving the standard of support for road crash victims.

Other bodies with roles in traffic law enforcement and regulation (e.g. the Traffic Commissioners, Health & Safety Executive and the Driver and Vehicle Standards Agency) also need to be strengthened, and enabled to collaborate more effectively. For instance, Cycling UK has highlighted several cases where lorry operators have been allowed to function for months after fatal collisions involving serious breaches of licencing or other requirements, because the Traffic Commissioners (who can take action in such cases) were not alerted in good time. Similarly, the HSE needs to be mandated and resourced to take a more proactive role in enforcing the rules on work-related driving. Transport for London set up a Freight Enforcement Partnership (LFEP) to improve co-ordination between the relevant bodies.⁸⁰ We urge the adoption of similar collaborative arrangements across the UK.

Road traffic offences and penalties

Cycling UK has long been concerned that the framework of 'core' road traffic offences (i.e. 'careless' and 'dangerous' driving, and their equivalents involving causing death or causing serious injury) is not fit for purpose.⁸¹ In response to campaigning by Cycling UK and its allies,⁸² the Government promised a comprehensive review of road traffic offences in 2014,⁸³ however this has still not materialised.⁸⁴

During the Transport Committee's 2015-16 inquiry on Road Traffic Enforcement,⁸⁵ it considered this issue, even though it felt (incorrectly we suspect) that this was strictly speaking a matter for the Justice Committee. The committee's inquiry report reflected Cycling UK's concerns on this point, noting that:

"There has been a decrease in the number of convictions for "causing death by dangerous driving" (falling steadily from 241 offences in 2004 to 123 offences in 2014)¹⁹ and a corresponding increase in the number of convictions for "causing death by careless or inconsiderate driving"²⁰ As a result the overall number of convictions for these "causing death" offences has remained steady, from 303

Workforce England & Wales, March 2017. July 2017; DfT Road Casualty GB annual reports; PQ www.theyworkforyou.com/wrans/?id=2012-09-07b.119892.h

⁸⁰ <https://tfl.gov.uk/info-for/media/press-releases/2015/october/enforcement-partnership-to-make-london-s-streets-safer> and <https://tfl.gov.uk/info-for/media/press-releases/2017/november/partnership-checks-more-than-33-000-vehicles-to-keep-london-s-roads-safe>

⁸¹ www.cyclinguk.org/article/why-should-government-review-road-traffic-offences-full

⁸² www.cyclinguk.org/minister-backs-talks-to-improve-traffic-justice

⁸³ www.cyclinguk.org/news/government-announces-full-review-of-driving-offences-and-penalties

⁸⁴ www.cyclinguk.org/blog/duncandollimore/government-will-nothing

⁸⁵ <https://publications.parliament.uk/pa/cm201516/cmselect/cmtrans/518/518.pdf>

offences in 2004 to 311 offences in 2014, with little variation in the intervening years.²¹ The offence of “causing death by careless or inconsiderate driving” was introduced in 2006, and since 2009 there has been a decrease in the number of convictions for “causing death by dangerous driving”, falling from 225 in 2009 to 123 in 2014. In the same period, the number of convictions for “causing death by careless or inconsiderate driving” has increased from 81 to 163. As shown in Table 1, there is no overall trend in the number of convictions for “causing death” offences. There are concerns that, as the overall number of “causing death” convictions has not reduced, offences that would have once been “causing death by dangerous driving” have effectively been downgraded to “causing death by careless or inconsiderate driving”. This falls within the jurisdiction of the Justice Select Committee, and we would encourage that Committee to look into this matter.”

Similar concerns were voiced by MPs from across the political spectrum during a Westminster Hall debate on ‘Road Justice’ in November 2018.⁸⁶

We are therefore concerned that the ‘Gear Change’ vision document’s proposed law-changes include only the previously announced proposals to increase the maximum sentence for causing death by dangerous driving (a sensible proposal, but one that will only affect a very small number of extreme cases) and to introduce a new offence of causing serious injury by careless driving. The latter proposal risks further entrenching the downgrading of driving offences that have caused obviously foreseeable ‘danger’ into the legal category of ‘careless’. We believe it is far more important to clarify the definitions of, or amend, the offences of ‘careless’ and ‘dangerous’ driving, and their equivalents involving serious or fatal injury.

4.4. Reduce the use of road freight, and the danger it poses to other road users, by: (a) maximising the use of rail and waterborne freight; (b) requiring the progressive adoption of ‘direct vision’ lorry cabs; and (c) maximising cargo-bike use for ‘last mile’ deliveries’.

Although heavy goods vehicles (HGVs) are involved in relatively few cyclist collisions, these are much more likely to prove fatal: 2% of recorded collisions between cars and cyclists result in the cyclist’s death, while the corresponding figure for HGV collisions is around 20%.⁸⁷

HGVs account for only around 3.6% of non-motorway motor-vehicle mileage on Britain’s roads, yet 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 (GB); and in well over half of cyclist deaths in London, even though they account for just 4% of miles driven there.⁸⁸

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.

Fortunately, new cab designs are now available (and becoming common on refuse vehicles). These give the driver a much better view of their surroundings without having

⁸⁶ www.cyclinguk.org/news/mps-criticise-inconsistent-laws-road-justice-debate

⁸⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833931/ras40004.ods

⁸⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/801188/tra0104.ods

to resort to mirrors, cameras and sensors. Modelling suggests these ‘direct vision’ cabs are likely to prove far safer.



We welcome the commitment in the ‘Gear Change’ vision document to explore the potential to progress towards normalising the use of direct vision lorries, following the approach adopted by Transport for London.⁸⁹ Government could show leadership by ensuring that HS2 Ltd, Highways England and other departments or non-departmental public bodies act as models of best practice in procuring ‘direct vision’ lorries, and encouraging local authorities to do likewise (e.g. for waste disposal contracts).

One obstacle to the widespread adoption of direct vision cabs is that the rules limiting the maximum length of lorries prevent direct vision cabs from being fitted to the longest lorries without reducing the amount of goods they can carry. Still, this should not prevent their use on smaller lorries, e.g. construction and refuse vehicles, which account for a very large proportion of cyclist deaths in urban areas.

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. Again, we welcome the commitment in ‘Gear Change’ to explore this option.

More too should be done to maximise the potential for cargo bikes to deliver smaller consignments in urban areas. As the Local Government Association has noted,⁹⁰ these could significantly reduce the number of delivery vans on busy streets.

Finally, the bodies responsible for the regulation and enforcement of lorries, lorry drivers and lorry operators need to be better co-ordinated – see “other enforcement bodies” in section 4.34.3 above.

5. OTHER TRANSPORT MODES

5.1. Support the combination of cycling with travel by train, bus, tram and other public transport by: (a) improving access to and provision for cycling at stations, stops and interchanges; (b) improving opportunities to carry pedal cycles on trains and other public transport vehicles; (c) improving information and customer service for those wishing to combine cycling and public transport; and (d) strengthened stakeholder consultation and monitoring to identify what is working and where improvements are needed.

⁸⁹ <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>

⁹⁰ www.local.gov.uk/sites/default/files/documents/5.90%20travelling%20less_02.pdf

Cycling UK's response to the Williams Review of Britain's railways⁹¹ shows how strengthening the combination of cycling and public transport could provide significant benefits for travellers, for public transport operators and for the wider public good:

- *For passengers*, the combination of cycling and public transport is a healthy and convenient door-to-door alternative to the private car. This can be especially valuable for those who do not / cannot drive, including many people with disabilities who can nonetheless use pedal cycles as mobility aids.
- *For public transport operators*, enabling passengers to cycle to stations, stops and interchanges can increase the catchment area for public transport services sixteen-fold, compared with the distances that can be walked in the same amount of time. This can critically enhance the viability of public transport services, particularly in rural areas. It can also reduce the substantial costs of providing car parking for passengers, particularly on high-value land near urban stations and interchanges.
- *For society*, enabling more people to cycle reduces congestion, road danger, pollution, physical inactivity and greenhouse gas emissions. It can also strengthen local economies in rural areas by bringing in recreational cycle users, including families, touring cyclists and mountain-bikers. It can also substantially reduce crowding on connecting urban public transport networks. For instance, the serious peak-time overcrowding on underground services in central London could be considerably worse if it wasn't for the large numbers of people who have taken up cycling in recent years to complete the city end of their journeys. There is still plenty of scope though for cycling to deliver far greater reductions in overcrowding in London and elsewhere, e.g. through better integration of rail and hire-bike schemes.

The potential for cycle-rail

In the Netherlands, 42% of rail trips involve cycling at the 'home end' of the journey,⁹² while 11% of rail trips are completed by bike at the non-home end.⁹³ By contrast, just 2.8% of rail trips in Britain in 2015 also involved cycling (48 million cycle-rail trips out of a total of 1.718 billion rail trips).

Yet this figure represents a very encouraging increase of 40% in the number of cycle-rail trips being made in Britain compared with 2010. Much (though by no means all) of this growth has been achieved through investment in cycle parking at rail stations. Cycle parking provision at Britain's rail stations has more than trebled over that period, to 77,000 spaces, while the number of rail journeys involving a cycle being parked at a station almost doubled (from around 16m to 28m). However rail journeys involving cycles (including folding bikes) being carried on trains has also grown, from around 17m to around 20m.⁹⁴

We are therefore pleased that the Government's 'Gear Change' vision includes commitments to enhance opportunities to combine cycling with both rail and bus travel.

We recognise that there clearly have to be limits on the carriage of cycles on public transport services at peak times and places. Hence the main measure for increasing the numbers of passengers who can combine cycling with public transport is to provide high-quality cycle parking at stations, stops and interchanges, along with more managed cycle storage and hire facilities at larger stations. Provision should nonetheless be made for

⁹¹ www.cyclinguk.org/sites/default/files/document/2019/05/cycling_uk_williams_review_response_phase_2.pdf

⁹² http://bitibi.eu/dox/D4_4_BiTiBi_Global_evaluation_report.pdf.

⁹³ www.fietsberaad.nl/getmedia/1c52943f-8948-4539-8b0d-4fda6048b1a2/Tour-de-Force-Bicycle-Agenda-2017-2020.pdf.aspx.

⁹⁴ Unpublished reports to the Government's Cycle Rail Working Group (CRWG).

cycles to be carried on trains, buses and other public transport vehicles, which can be used on more lightly loaded services. This can provide a really useful boost to their economic viability, helping to safeguard public transport connections that also matter to other passengers and to local economies, particularly in rural areas.

Cycle access to, and facilities at, stations, stops and interchanges

Public transport stations and interchanges should clearly be key nodes in any Local Cycling and Walking Infrastructure Plan (LCWIP – see section 3.1). The immediate access into and out of a station is also important. Where a station is at a different level from the road(s) around it, ramped access is valuable both for cycling and for wheelchair users.



Sheaf Square: ramped access to Sheffield station as part of the “Gold Route” pedestrian / cycle link to the town centre



Ramped access to Grange over Sands station, Lake District

Access within the station should also be planned to benefit both cycle and wheelchair users. Where lifts cannot immediately be provided, wheeling ramps are a useful (and inexpensive short-term measure at least to facilitate cycle access.



The provision of ample, well-located, sheltered and secure cycle parking at stations is a highly cost-effective way to boost both cycle use and rail patronage:

- Under the DfT-funded Bike'n'Ride programme, four train operators installed 2,800 'standard' parking spaces, 1,161 secure cycle spaces (e.g. in lockable areas), 48 cycle lockers, 310 hire bikes and three cycle hub or cycle hire facilities. This led to an overall doubling in the proportion of rail passengers cycling to the stations in question: from 6% to

12%. It also increased the frequency of their rail journeys (the proportion who travelled 5 times a week increased from 47% to 57%).⁹⁵

- A 2004 Transport for London survey of cycle parking provision at Surbiton station (which was then new) found that a quarter of the users had only started cycling since the cycle parking at been introduced, with a third saying they would be unlikely to cycle if the cycle parking was not there. 13% of cycle users had switched from travelling to the station by car, freeing up car parking spaces for other users.⁹⁶
- Anecdotal evidence of several other cycle parking installations shows that they are quickly filled – for instance, the recently-provided new cycle parking at Chelmsford station was full within a month. This has been particularly true though for cycle parking provision at terminus stations, which has grown hugely over the past decade. The main cycle parking location at Waterloo station increased from just 30 cycle spaces in 2002 to over 630 spaces by 2014, with a further 500+ Santander Cycles (or ‘Boris bikes’) being hired out daily from 124 stands.

Despite the recent trebling in station cycle-parking provision (see page 29), the average number of cycle spaces at Britain’s 2,563 train stations⁹⁷ is 30 cycle parking spaces per station. By contrast, the Netherlands’s 410 stations have around 500,000 cycle spaces, an average of 1,220 per station.⁹⁸ We therefore urge that DfT continues to support the work of the Cycle Rail Working Group in boosting both the quantity and quality of cycle parking and storage facilities at stations.



Cycle parking at York



Double-deck cycle parking



A secure cycle storage hub at Horsham



Cycle parking at Utrecht station, the Netherlands

The type and location of cycle parking and storage needs to reflect the nature of how each station is used. ‘Home end’ stations (e.g. suburban or commuter-belt stations in rural hinterlands) will mostly require cycle parking during the day, whereas ‘destination

⁹⁵ www.raildeliverygroup.com/files/Publications/archive/2011-07_bike_n_ride_evaluation.pdf

⁹⁶ http://cycle-works.com/wp-content/pdfs/transport/TFL_Final_Report_-_Cycle_Parking_at_Surbiton_Station.pdf

⁹⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/761669/rai0104.ods

⁹⁸ www.itf-oecd.org/sites/default/files/docs/improved-cycling-transit-integration-synergies.pdf

end' stations in city centres are more likely to have cycles left overnight. Staffed cycle hire facilities can be valuable at rural stations with significant recreational cycling demand.

Cycle carriage on public transport services

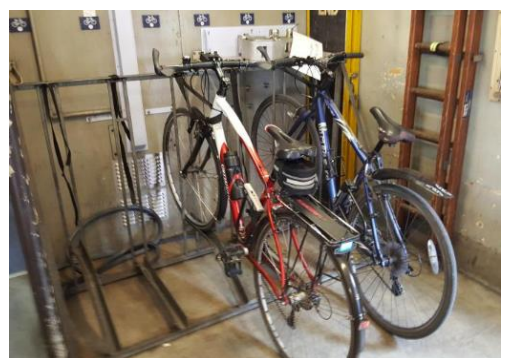
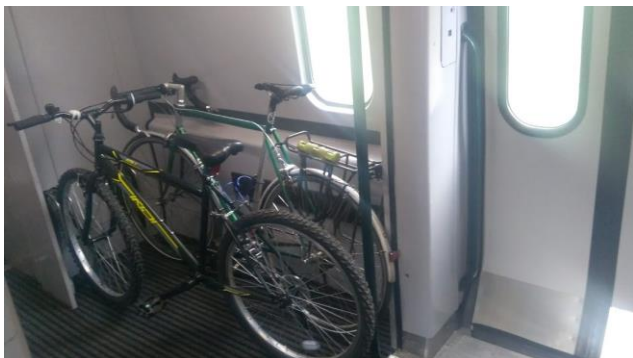
Regardless of the availability of station cycle parking and storage, the ability to carry one's pedal cycle (particularly on off-peak trains) is important to some customers, e.g. those engaging in recreational cycling. Making provision for cycle carriage can significantly help boost the economic viability of more likely-used train services that might otherwise be economically marginal.

Cycle spaces on trains need to be easy to use, including by people who are short, frail or those with disabilities. How this is best achieved depends on the type of train:

- On trains which are hauled by a separate locomotive, there is normally ample space for cycles in the 'guards van' area.
- On longer-distance trains without locomotives, the doors are typically located at or near the ends of each carriage. It is better that they are near (rather than at) the end, allowing space to be provided for cycles, tip-up seating or other luggage between the doors and the end-wall of the carriage.
- On local trains designed for regular stops (i.e. where the speed of passengers boarding and alighting is critical, and where seating is less critical), there are normally double-doors near the centre of the train, and plenty of standing room around the doors. For this arrangement, the preferred option for cycle carriage is flexible space just inside the doors that can also be used as standing room at peak hours.



Cycle storage inside the doors of local trains: examples from Merseyrail and South Western Rail



Cycle storage between the door and end-wall of a longer-distance train, and in the guard's-van of a loco-hauled train

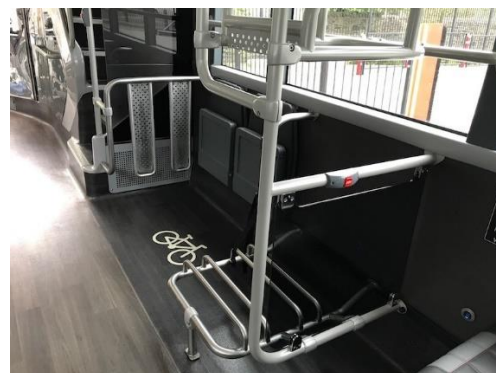


International good practice, from Germany and Austria



Bad practice from the UK: The Voyager and Intercity Express Programme (IEP) trains. Insufficient space, and very difficult to use – especially for shorter or disabled people – particularly when other passengers want to get past as the train leaves or arrives at a station.

Cycles can also be carried on buses or coaches, either on external racks, or inside buses (this is more appropriate for relatively lightly-used rural services in areas where recreational cycling is popular), or in the underfloor area of coaches.



A cycle rack on the front of an American bus, and cycle storage inside a bus in the Lake District.

We call for action to clarify the safety of front-mounted cycle racks. This arrangement is common in the USA (where 95% of buses had front-mounted cycle racks by 2010⁹⁹), yet is considered to be unsafe in the UK due to a questionable TRL report from 2004.¹⁰⁰

⁹⁹ www.peoplepoweredmovement.org/site/images/uploads/2012-Benchmarking-Report-Final-Draft-WEB.pdf

¹⁰⁰ <https://trl.co.uk/sites/default/files/TRL592.pdf>

Information and customer service, including cycle reservations

Passengers travelling with cycles on longer-distance services greatly value the ability to reserve a cycle space, giving them the confidence that they can complete their journey as planned. Cycling UK believes cycle reservations should be available on any train service for which seats are also reservable.

On the other hand, rules requiring cycle spaces to be reserved can seriously inhibit the flexibility of cycle-rail travel, unless reservations can be made at the station right up to the last moment. Computerised reservation systems are now making this possible on newer rolling stock. Cycle reservation requirements should not be imposed where these systems are not in place. They particularly affect season-ticket holders and other regular travellers, who do not necessarily know what time they will be travelling. Such rules force them to hedge their bets by making cycle reservations for several trains. This of course makes the situation even worse for their fellow cycling passengers.

Rail operators should assist cycle users to know where they should stand on the platform to load their cycles quickly and efficiently, without the stress of feeling they are delaying the train by having to run to the other end of it to find the cycle storage area. This can be done both by training platform staff to speak to cycle users on the platform before the train arrives and/or by marking the cycle spaces very clearly on the train itself.



Cycle space clearly marked on a Danish train.

Stakeholder engagement and monitoring

Finally, it is important to gather information and data on what is working and what is not, both from surveys of cycle parking usage, passenger surveys and cycle user forums. This should be used to inform future plans and spending allocations.

5.2. Support the development and use of public bike hire and sharing schemes.

Bike hire and bike sharing schemes can take many forms. Cycles can be hired from a fixed location (normally staffed) and returned to the same location – this works well in locations where recreational cycling is popular. Other schemes offer a network of staffed hire-points. Unstaffed schemes can involve docking stations (such as the Santander Cycles scheme in London, the Velib scheme in Paris, and similar schemes in other cities), or can be dockless (using technology which ensures that the bike can only be unlocked by a known user whose credit card details are held on the system), or hybrid schemes (which seek to provide the flexibility of dockless schemes while avoiding the risks of obstructed highways, by requiring users to park the bike in docks in more heavily used areas).

Hire bike schemes can provide an excellent “try-before-you-buy” opportunity for people considering cycling. They can be particularly valuable for groups who are under-represented in cycling and/or those who stand to gain disproportionately from the accessibility and/or physical activity it provides. These groups include women, people on lower incomes, people from ethnic minorities, older people, disabled people, and people with health conditions that make exercise difficult but which could be assisted by taking exercise anyway.

Schemes which offer the hire of electrically-assisted pedal cycles (or ‘e-bikes’) or non-standard cycles (e.g. tricycles, which may be needed for people with some disabilities), can be particularly valuable. These types of cycle are expensive, and are unlikely to be affordable groups who most stand to benefit from these types of cycles are unlikely to want to risk of buying an e-bike without first deciding whether it is likely to benefit them.

This section of our responses concentrates on unstaffed schemes. These widely seen in effect as an extension of the public transport system. The latest survey of users of hire-bike schemes in the UK, run in 2019 by charity CoMoUK,¹⁰¹ found that 35% of users use bike share in conjunction with train travel, and 23% of users combined it with bus travel.

The CoMoUK survey also found that:

- 40% of bike share users were female (this is significantly higher than the overall ratio for cycle use in Britain);
- 46% of users said that the bike share scheme was the catalyst from them to take up or resume cycling.

In short, bike share schemes are a highly effective way to introduce people to cycling, to boost the diversity of those who cycle, and to complement public transport use.

Two years ago, the UK (and other countries) saw a wave of dockless bike share schemes, provided by private companies at no cost to the public purse, on the basis that the operators would collect commercially valuable data about their users and their travel habits. However this operating model has failed catastrophically, with the operators discovering that they had significantly underestimated the operating costs of running bike share schemes. These costs are partly due to the need to relocate bicycles (counteracting the tidal flows of bikes in towards city centres in the morning, and away in the evening), and partly to address the problems of theft, vandalism and irresponsible

¹⁰¹ <https://como.org.uk/wp-content/uploads/2019/11/CoMoUK-Bike-Share-Survey-2019-final-1.pdf>

parking. These costs are particularly high in more disadvantaged areas – yet it is in precisely these areas that bike share schemes could provide the greatest social benefits.

The bursting of the ‘dockless bubble’ has highlighted the need for some public funding to procure economically viable (and hence durable) bike share schemes. In some areas, all that is needed is some capital support to establish a scheme, which can then become economically self-sufficient. In other (particularly more disadvantaged) areas, some additional revenue is required, particularly to maximise the benefits of providing healthy mobility for people who may face multiple disadvantages (e.g. in terms of their health, their economic circumstances and/or a lack of transport options or access to amenities, employment and training opportunities etc).

5.3. Adopt a ‘Safety first’ approach to regulating new transport technologies, seeking to maximise potential environmental and other benefits whilst avoiding potential safety and other threads to cycling, walking and other sustainable transport options

New transport technologies, such as autonomous vehicles as well as ‘micromobility’ vehicles, offer the prospect of reduced car use as well as greater safety. However, in both these cases, there are risks as well as opportunities.

In order to maximise the potential benefits and minimise the potential risks, Cycling UK advocates a precautionary approach to legislating for their introduction.

Autonomous vehicles

In terms of increasing the convenience and safety of cycling, 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 fully automated vehicle when they needed one, this could 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:* Fully automated vehicles 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 drivers of semi-automated and highly automated vehicles could become increasingly inattentive, relying on technology that is actually very unreliable.

There may come a time when fully automated 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 is likely to 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 semi-automated and automated vehicle technology with conventional human drivers.

However, until that point is reached, Cycling UK urges that the evolution and progressive roll-out of automated and semi-automated vehicle technologies should be regulated so

as to maximise the safety of all road user types, in accordance with the 'Safe Systems' and 'Vision Zero' principles of road danger reduction. Unfortunately, it will initially be easier for Automated Vehicles (AVs) to avoid collisions with other motor vehicles than with pedestrians, cyclists and other non-motorised road users (NMUs). 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 AVs.

It is likely that AV manufacturers, keen to recoup their product development costs, will seek to have AV use widely legalised, as soon as AVs are achieving a net reduction in casualties, even if at this point they are still be more dangerous to pedestrians, cyclists and other unprotected road users. The safety of these groups must therefore be a key factor in deciding when and where to permit the use of AVs, and how to regulate them.

Legislation will be needed to determine criminal (as well as civil) liability in collisions involving AVs, e.g. where a driver puts an AV into self-driving mode in inappropriate circumstances (which need to be clearly defined), or fails to resume control when the vehicle indicates that driver intervention is needed. There should be a presumption that pedestrians and cyclists injured in collision with an autonomous vehicle are entitled to compensation, unless it can be shown that the injured party was at fault. UK law is already unusual in placing the onus entirely on the injured party to demonstrate negligence on the part of the driver (the only other European countries to do so are Ireland, Rumania, Cyprus and Malta¹⁰²). If this situation persists with AVs, injured pedestrians and cyclists will be further hampered by not knowing whether to bring an action against the driver or the vehicle / system manufacturer. Meanwhile the latter will also be strongly motivated to withhold any information that might highlight safety flaws in their systems, having doubtless spent many millions developing these.

For more, see Cycling UK's response to the Law Commission's consultation on Automated Vehicles.¹⁰³

E-scooters and other 'micromobility' vehicles

Electric scooters (or 'e-scooters') and other 'micromobility' vehicles could similarly deliver significant reductions motor traffic (and the associated CO2 emissions and other negative impacts. As with AVs, the balance between the potential upsides and downsides will depend on how they are regulated.

Viewed positively, e-scooters and similar micromobility vehicles could be a clean and space-efficient way to reduce congestion, road danger, pollution and greenhouse gas emissions caused by excessive car use. Clearly, the faster they are permitted to travel, and the more powerful their motors, the greater the potential to attract people from driving. However this comes at a cost of increasing the risks they pose to pedestrians (particularly more vulnerable pedestrians) and to health benefits of cycling. E-scooters risk being treated as 'throw-away vehicles', and could also pose safety risks of their own, given their sensitive steering (due to their narrow handlebars) and small wheels (which is likely to make them more vulnerable to road surface defects).

There is contradictory evidence on whether they are likely to attract more people from driving, or from walking, cycling and public transport. American evidence from Santa Monica (California) and Portland (Oregon) suggests the former, whereas Parisian

¹⁰² www.slatergordon.co.uk/media-centre/blog/2015/08/cycling-accidents-and-presumed-liability-uk-vs-europe

¹⁰³ www.cyclinguk.org/sites/default/files/document/2019/02/1811_cuk_lawcomm_cav_v4.pdf

suggests the latter (an OECD report¹⁰⁴ provides a summary of the available evidence). This would not only undermine their potential environmental benefits, but could undermine the health benefits of walking and cycling, given that e-scooter use does not entail physical activity.

It is also unclear whether or not the environmental benefits from the use of e-scooters outweighs the environmental impact of their manufacture and disposal. A study by North Carolina State University¹⁰⁵ attempted a whole lifecycle assessment of the net carbon impacts of hired e-scooters. Taking account of the costs of manufacturing and transporting the scooters, it found that whether e-scooters delivered a net saving in carbon emissions was very sensitive to how long they lasted. Manufacturers have rightly responded to criticisms of e-scooters as “throw-away vehicles” by making them more robust.

The safety trade-off is also unclear. The OECD report mentioned earlier found that a shift from car use to e-scooters and other ‘Type A’ micromobility vehicles (i.e. those which are speed-limited to a maximum of 25 kmh / 15.5 mph) was likely to achieve a net road safety benefit, because the increases in injuries and fatalities suffered by e-scooter users would be outweighed by the reduction in overall danger to other road users (including pedestrians and cyclists, as well as e-scooter users themselves) from motor vehicles.

However it is not clear that this beneficial effect could not be achieved more effectively by promoting a shift to cycling instead. The injury risks to e-scooter users themselves were similar to those faced by cycle users – though two studies found higher risks of hospitalisation for e-scooter riders, and the fatality risk was also slightly higher. The proportions of e-scooter injuries due to road surface maintenance defects (rather than collisions with other motor vehicles) was markedly higher for e-scooter users, which also suggests that e-scooter injuries are less likely to be reduced by installing high-quality protected cycle lanes.

Faced with these uncertainties about the net benefits and disbenefits of legalising e-scooters, Cycling UK advocated that the Government’s trials (which are now underway) should have been legalised for on a precautionary basis. Specifically, their speed should have been limited to 20kmh (12.5 mph) – as it is in Germany, Sweden and Norway¹⁰⁶ - and their power and weight should have been limited to 250W and 35kg respectively.

We were therefore very disappointed at the Government’s decision to adopt higher limits than those proposed in its consultation. We fear these limits may turn out to be too high, both for the safety of pedestrians and for avoiding the risk of undermining the health benefits of cycling. If our fears prove correct though, it may be very difficult to reverse this decision, as both manufacturers and individuals can now be expected to invest significantly in vehicles at the upper end of the permitted ranges. We believe that a more precautionary approach to regulation would have been more sensible, and should be adopted in regulating other new technologies.

¹⁰⁴ www.itf-oecd.org/sites/default/files/docs/safe-micromobility_1.pdf, see Table 3

¹⁰⁵ <https://iopscience.iop.org/article/10.1088/1748-9326/ab2da8>

¹⁰⁶ www.eltis.org/discover/news/e-scooter-regulations-germany-and-france

6. CYCLING OPPORTUNITIES FOR ALL

- 6.1. Support programmes (in addition to the planned expansion of cycle training and the plan for ‘cycling on prescription’ through the NHS) to boost cycle use among groups who are under-represented in cycling, including women, older and disabled people, people from black and minority ethnic communities and other disadvantaged groups.**

Cycle training

Cycling UK strongly welcomes the commitments in the ‘Gear Change’ vision document to extend the provision of cycle training for adults and children of all ages, including disabled people using adapted cycles.

The three levels of the Government-backed National Standard for cycle training are intended to offer a progression through from basic cycle control skills (level 1) to having the confidence to handle busy roads and junctions (level 3). Yet at present, cycle training is currently offered to just 50% of primary school age pupils, most of whom only get offered cycle training to level 2. Few pupils are offered level 3 cycle training at secondary school, at a time when their journey distances are increasing, as is their independence. We hope this will now be addressed, alongside widespread provision of cycle training for adults.

There is good evidence that adult cycle training is highly cost-effective in encouraging new people to cycle, to cycle more often and for longer journeys, and to feel more confident when doing so. For younger children the evidence is less strong, suggesting that cycle training may be necessary but not sufficient to give parents the confidence to allow their children to cycle independently. Nonetheless, international best practice still supports its inclusion as a vital component of any wider strategy to promote more and safer cycling.¹⁰⁷

Health, inclusive cycling and other community-based behaviour-change programmes

Cycling UK similarly welcomes the ‘Gear Change’ vision document’s commitment to work with the NHS on incentivising GPs to prescribe cycling, starting with pilots in areas with poor health and low physical activity rates. Nonetheless, we believe there is more that could be done to boost the diversity (as well as the number) of people taking up cycling.

There is good evidence that behaviour-change programmes, in schools, workplaces and community settings can be highly cost-effective ways to boost cycle use, particularly among groups such as women, older people, BAME communities, health patients and people with disabilities.¹⁰⁸

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) has been run since 2015 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 maintenance workshops, cycle training and accompanied rides. 46%

¹⁰⁷ www.cyclinguk.org/campaigning/views-and-briefings/cycle-training.

¹⁰⁸ www.cyclinguk.org/sites/default/files/document/migrated/info/smarterchoices7abrf.pdf

of participants in *Big Bike Revival* events in England were non-regular cyclists, almost half were women and 46% 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 Scotland, which have attracted 50,000 participants. Half of them were women, 53% are from the most deprived three deciles of neighbourhoods, 56% are from BAME backgrounds and 50% of attendees are non-regular cyclists on joining. 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) is a potential prototype of how the Government's 'social prescribing' scheme could work. It 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.

We urge DfT to reflect the importance of such revenue-funded behaviour change programmes, both in the Transport Decarbonisation Plan and in the Spending Review and the 2nd Cycling and Walking Investment Strategy which will follow it.

Roger Geffen
Policy Director

August 2020