

THE GOVERNMENT'S DRAFT CYCLING AND WALKING INVESTMENT STRATEGY (CWIS) Response from Cycling UK

INTRODUCTION

Cycling UK was founded in 1878 and has 68,000 members and supporters. Cycling UK's central mission is to make cycling a safe, accessible, enjoyable and 'normal' activity for people of all ages and abilities. It was previously known as CTC or the Cyclists' Touring Club. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits both for individuals and society. We represent the interests of current and would-be cyclists on public policy matters.

GENERAL COMMENTS

Ambition

Cycling UK strongly supports the stated ambition for the Cycling and Walking Investment Strategy (CWIS), namely:

“to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey.” (paragraph 2.2)

We also strongly support the stated aims to make cycling and walking *“a normal part of everyday life”* by 2040, to make them *“the natural choice for short journeys”*, and for *“everyone in the country to have access to safe, attractive routes for cycling and walking”* (paragraph 2.1).

Similarly, we wholeheartedly support the aspiration for *“a transformative change”* to tackle congestion, to support local economies, to improve health, to benefit employers, to strengthen high streets and to create opportunities for all (paragraphs 2.3 - 2.4). We also welcome the recognition that *“realising our ambition will take sustained investment in cycling and walking infrastructure”, “long-term transport planning”* and *“a change in attitudes – amongst central Government, local bodies, businesses, communities and individuals”*, with *“walking and cycling [being] seen as transport modes in their own right ... rather than niche interests or town-planning afterthoughts”* (paragraph 2.5).

We also agree that getting this right will *“create places where people want to live, work and shop ... increase the number of cycling trips, [reduce] the likelihood of cyclists being killed or seriously injured, [create] streets that are safer for walking and a healthier nation [where] cycling and walking are the norm for people whatever their background or personal characteristics”* (paragraph 2.6).

Policy challenges

There are several political imperatives which investment in cycling and walking could address:

Air quality:

The Government is facing renewed legal challenges over its failure to meet European air quality standards¹. For more information, see Cycling UK's air quality briefing².

¹ See www.clientearth.org/judge-decides-uk-government-will-face-legal-action-air-quality/.

² Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/air-quality.

Energy consumption and climate change: If demand for road transport rises in line with the projections of the Department’s National Transport Model (NTM) – i.e. if road traffic grows by between 19% and 55% by 2040³ – this would result in increased energy demand. That in turn would outweigh even the most optimistic of estimates for improvements in the fuel-efficiency of the vehicle fleet – and by a substantial margin in the NTM’s higher-growth scenarios. This increased demand would make it even harder to meet the country’s overall energy demand in a way which was consistent with the decarbonisation target set in the Climate Change Act 2008 (namely to reduce emissions by 80% by 2050), and the 5th carbon budget proposed by the Committee on Climate Change (the Government’s statutory advisors on how to meet the Climate Change Act’s target). For more information, see Cycling UK’s briefing on climate change⁴.

Obesity and physical inactivity:

In 2012, 33% of men and 45% of women failed to meet the recommended levels of physical activity. Between 1993 and 2013, the proportion of adults in England who are overweight or obese increased from 57.6% to 67.1%, while childhood obesity rates have also been rising. The World Health Organisation has predicted that 33% of women and 36% of men will be obese by 2030. Obesity reduces life expectancy by 3 to 10 years on average, depending on the severity. 37% of coronary heart disease deaths are estimated to be related to physical inactivity. Inactivity and sedentary behaviour are also associated with breast and colon cancers, type 2 diabetes and cardiovascular diseases. For sources and further information see Cycling UK’s health briefing⁵.

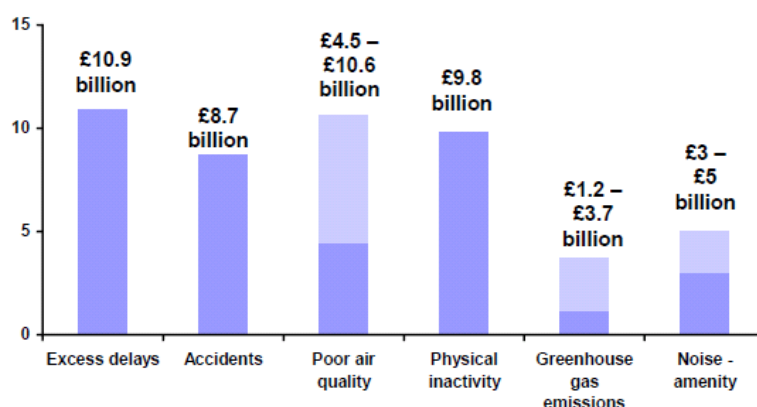
Road danger, particularly for vulnerable road users.

Despite Britain’s historically good road safety record, progress on reducing the risk of serious injuries has largely stalled since 2009. Vulnerable road users have fared particularly badly; the risk of a cycling injury per mile travelled has increased by 14% since 2009, with the serious injury rate increasing by 19%. Motorcyclists and pedestrians have seen similar increases⁶.

Economic costs of urban transport policy failures

A 2009 study by the Cabinet Office Strategy Unit report found that the “costs of transport harm in urban areas” are between £38-49 billion per year. Interestingly, the costs of congestion, road casualties, physical inactivity and air pollution were all of a similar magnitude: around £10bn each. Other costs include greenhouse gas emissions, noise and low enjoyment of space.

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



³ See www.gov.uk/government/publications/road-traffic-forecasts-2015.

⁴ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/climate-change.

⁵ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/health-and-cycling.

⁶ Department for Transport, *Reported Road Casualties Great Britain*, table RAS30013

(www.gov.uk/government/uploads/system/uploads/attachment_data/file/10158/ras30013.xls).

Targets and funding

Given the importance of these policy challenges, it is regrettable that the rest of the draft CWIS falls far short of what is needed to meet the admirable aspirations of its opening sections.

Its stated target – namely to double the number of cycling trip-stages between 2013 to 2025 – is not remotely consistent with the aim to normalise cycling by 2040. Assuming no great change in the total number of trips made by people in Britain, this target would amount to an increase in the proportion of trips made by cycle from less than 2% of trips to less than 4% of trips. If this rate of growth were to be continued, Cycling UK estimates that Britain would eventually reach Dutch levels of cycle use shortly before the start of the 23rd century.

We similarly doubt whether the funding available is sufficient even to meet this under-ambitious target. We note that the Prime Minister and cycling minister Robert Goodwill supported calls from Cycling UK (during our Vote Bike campaign ahead of the 2015 general election) for investment in cycling to reach at least £10 per person annually⁷. Moreover Robert Goodwill had previously told Parliament he hoped to achieve this by 2020/21⁸. Yet Cycling UK estimates that the Government's funding allocation for the CWIS will amount to just 72p per person in 2020, to cover walking as well as cycling. We do not believe the Government can remotely expect to secure funding worth at least £9.28 per person from local sources.

We therefore urge the Government to redeploy funding from the £15 billion Roads Investment Strategy (RIS) to the Cycling & Walking Investment Strategy (CWIS). We believe this would do far more to tackle the policy challenges listed previously, rather than exacerbating them. It would also perform far better in overall cost-benefit terms⁹.

Alternatively, we urge the Department to publish any evidence it has that the funding allocated is sufficient to meet its ambition, objectives and target, and/or any evidence it has of the funding and other measures needed to reach these goals.

We also call on the Department to spell out how it expects to secure additional funding from other sources, and how it will monitor whether the funding and other measures being delivered by other bodies are adequate to meet its aspirations and target.

How the strategy needs to be strengthened

In common with other cycling and walking groups, Cycling UK believes that the adopted version of the CWIS needs to include the following:

1. **A pathway towards achieving the Government's ambition for cycling and walking in England.** It should identify the necessary milestones for 2020, 2025 and 2040 for each of its stated objectives. More ambitious targets will be needed both for increased cycling and walking, and for improving their safety, across England by 2025.
2. **A plan to at least meet clear targets for both cycling and walking and other outcomes.** This should set out the measures proposed, together with the evidence that these are sufficient to deliver the strategy's targets and milestones for more and safer walking and cycling.

⁷ See www.cyclinguk.org/press-release2015-05-12/sixth-new-commons-strongly-support-cycling-0.

⁸ See www.gov.uk/government/speeches/cycling and www.theyworkforyou.com/debates/?id=2014-10-16a.487.0#g522.2.

⁹ See Cycling UK's briefings on national transport policy and on the economy, downloadable from www.cyclinguk.org/campaigning/views-and-briefings/national-transport-policy-cycling and www.cyclinguk.org/campaigning/views-and-briefings/cycling-and-economy respectively.

3. **A package of committed Government investment and other potential funding to deliver the Strategy.** This should show the sums allocated by national Government to deliver the Strategy over the current parliamentary term, together with additional funding opportunities from local and non-government sources, and the means by which these will be secured.
4. **A framework for assessing performance** with Key Performance Indicators and requirements. This should enable greater transparency, accountability and engagement of not just the Government but also sub-national bodies and local authorities, given their important role in delivery.
5. **Independent governance that challenges and supports** the preparation and delivery of current and future Strategies, in particular through monitoring and assessing performance.

We believe that these elements are necessary to ensure that this first important CWIS is strong and successful in helping to deliver the Government's 2040 ambition.

RESPONSES TO CONSULTATION QUESTIONS

Question 1: The Government would be interested to hear views on the approach and actions set out in section 8 of this strategy

Key missing elements: targets, funding and design standards

Our overarching concerns about the overall strategy, including section 8, are that:

- The draft CWIS's proposed target for increased cycle use is well below what is required to normalise cycling by 2040. We also call for the inclusion of targets for increased walking, and to do so with no increase in the risk per mile travelled for either cycling or walking.
- The central government funding identified in section 5 of the draft CWIS appears wholly insufficient to meet even the inadequate target proposed in the strategy – hence the weakness of the measures identified in section 8.
- The lack of design standards means that a significant proportion of the available funding is likely to be mis-spent on infrastructure that is of little or no value, and/or which is positively dangerous. It also means that opportunities to improve cycling conditions in the context of other highway and transport projects, new developments and planned maintenance works are likely to be missed, or delivered badly.

We therefore call on Ministers to make a substantial reallocation of funds from the Roads Investment Strategy (RIS) to the Cycling and Walking Investment Strategy (CWIS), given the significantly greater value-for-money of the latter, and the fact that it will tackle the aforementioned policy challenges of congestion, road danger, physical inactivity and ill-health, pollution and climate change, rather than exacerbating these.

We also call for the adoption of design standards to ensure that whatever funding is available is well spent, and to maximise the opportunities for improved cycling and walking conditions in the context of other policies, programmes and individual schemes.

Organisational arrangements

Para 8.1 bullet-point 1: Expert Committee

The expert committee (more fully described in section 6) will need teeth not only to be able to identify what support is needed for local authorities with genuine aspirations to normalise cycling, but also to be able to hold failing local authorities and other public bodies to account. At present, the Committee appears to have no enforcement mechanism and little funding that

it even steers, let alone that it gives out directly. It is therefore hard to see what influence it will wield. The Committee will also need good information about the picture of performance by councils, combined authorities, LEPs, public transport operators, police forces and others in order to fulfil its role in advising Government on whether the CWIS is achieving its stated aims. This too needs to be adequately resourced.

Para 8.1 remaining bullet-points and para 8.2: LCWIPs, LEPs, Sub-national Transport Bodies and supporting local good practice

Our comments on Local Cycling and Walking Infrastructure Plans (LCWIPs), the role of Local Enterprise Partnerships (LEPs), Sub-national Transport Bodies and arrangements to promote good practice in each of these contexts are discussed below in response to paragraphs 8.23-8.25.

Better Safety

“8.1.2 The design of cycling and walking facilities is the responsibility of the local traffic authority”

Whilst Cycling UK agrees that the design of individual facilities is a matter for local traffic authority, we do not believe this exonerates the Government from responsibility for issuing design guidance. For one thing, failings in the design of cycle facilities can be safety-critical. For another, there is ample evidence that the hostile design of most of our road networks, and the poor design of most cycle facilities, disproportionately deters children, women, older people and people with disabilities from cycling.

We therefore believe that, in preparing the final CWIS, the Government needs to have regard to its Public Sector Equality Duty (PSED) under the Equality Act 2010, to advance equality of opportunity between people who share a protected characteristic (e.g. young people, older people, people with disabilities) and those who do not. It also needs to ensure that the advice it offers to local authorities on planning and delivering their Local Cycling and Walking Investment Plans (LCWIPs) guides them on the standards they need to meet in order to comply with their own Equality Act duties, so that all highway and traffic schemes, off-road cycle links, new developments and indeed planned road maintenance works are planned and delivered with regard to the needs of protected groups.

See further discussion of Public Sector Equality Duty in our response to paragraph 8.23 below.

8.1.2 TSRGD changes

Cycling UK welcomes the recent changes to the Traffic Signs Regulations and General Directions (TSRGD), as listed in this paragraph. However further changes are still needed. The most important of these are:

- Ways to give priority to cyclists and pedestrians going straight ahead over other vehicles turning across their path, at both signalised and unsignalised junctions
- Permitting the introduction of ‘simultaneous green’ signalised junction designs (where cyclists and pedestrians simultaneously receive green signals allowing them to move simultaneously in all directions at traffic lights¹⁰).
- A traffic sign which indicates shared pedestrian cycle use but with a requirement for cyclists to have primary responsibility for avoiding conflict with pedestrians.

8.1.3 Highways England

Cycling UK has broadly welcomed Highways England’s Cycling Strategy¹¹. Though short on detail (which is due to be provided in a subsequent delivery plan), it includes a number of suggestions made by Cycling UK during the consultation.

¹⁰ Transport Research Laboratory (TRL), report PPR716: *Literature Review looking at Dutch Style (fully segregated) signalised junctions* (see www.trl.co.uk/media/399630/ppr716_literature_review_looking_at_dutch_style_signalised_junctions.pdf).

¹¹ See www.cyclinguk.org/news/20160108-fund-cycling-road-investment-strategy.

We also await the publication of Highways England's forthcoming Interim Advice Note (IAN) on cycle-friendly planning. An early draft which we were given sight of looked very promising.

A key issue will be to ensure that Highways England's staff and sub-contractors receive good training in the principles of cycle-friendly planning and design – bearing in mind that few of them will have learnt this as part of their formal education or within-work training.

We also urge that Highways England shows leadership in promoting lorry safety for work on its construction projects. For more see below.

8.1.4-8.1.5 Cycle training

Cycling UK welcomes the continued support for Bikeability cycle training. However we urge the Government to go further and commit to make Bikeability cycle training available for all school pupils at both primary and secondary school age. At present, it is available to about half of all school pupils, often at primary school age only.

We also urge a stronger commitment to make Bikeability cycle training widely available for adults wishing to discover or rediscover cycling later in life. The way cycle training is offered should be further "segmented" for different population groups, focusing on those from groups under-represented in cycling (e.g. older people, ethnic minority groups, people with disabilities, people from deprived neighbourhoods etc), given the strong associations of these groups with both physical and mental ill-health as well as economic disadvantage. For more on this, see our response to Question 4.

Issue not covered: Lorry safety

The Government needs a wider freight strategy aimed at reducing the nation's dependence on road freight. This should include the development of trans-shipment depots, and strategies to maximise the use of rail and water-borne freight (notably through planning policies).

In terms of cycle safety specifically, we urge the Government to positively endorse the Fleet Operator Recognition Scheme (FORS) and the Construction Logistics and Cycle Safety (CLoCS) standards for lorry safety, developed by Transport for London. We also urge that these standards should be strengthened to incentivise (and in due course to normalise) the widespread use of 'direct vision' lorry cabs (i.e. those which enable the driver to see what is around them as easily as bus drivers can, by placing the driver nearer the ground and surrounding them with as much window as possible).

The Government has an opportunity to show real leadership in promoting these standards, by adopting them for use on contracts for the High Speed 2 rail link and the motorway and trunk road network – given that both HS2 Ltd and Highways England are effectively Government-owned companies. We urge the Government to include a commit to these standards (especially the use of direct vision lorries) in the final CWIS.

Finally, we urge the Government to follow Transport for London's lead in setting up the London Freight Enforcement Partnership. LFEP facilitates data-sharing between the police, the Driver and Vehicle Standards Agency (DVSA), the Health and Safety Executive (HSE) and Traffic Commissioners, so that investigations into suspect lorry operators can be launched swiftly in the aftermath of incidents, leading to prosecutions and in some cases the withdrawal of licences from unsafe lorry operators¹². Cycling UK has documented two cases of unsafe 18 months (and the conviction of the relevant lorry drivers) for the matter to come to the operators whose lorries were involved in the deaths of cyclists, yet in both cases it took over attention of the Traffic Commissioners, and 2 years for them to finally lose their licences¹³.

¹² See www.cyclinguk.org/news/20151013-collaborating-unsafe-hgvs.

¹³ See www.cyclinguk.org/press-release/2015-11-24/ctc-demands-tougher-action-dodgy-drivers-lorry-operators.

Issue not covered: Road traffic law and enforcement

Road traffic law enforcement is highly effective both as a road safety measure and as a means of detecting other crimes. Yet it has suffered disproportionate cuts in recent years. Moreover, the introduction of the relatively new offence of 'causing death by careless driving' has led to a downgrading of the boundary between 'careless' and 'dangerous' driving offences, which in turn frequently leads to derisory sentencing. Cycling UK's Road Justice campaign calls on the Government to address these concerns by:

- Strengthening the resources for roads policing, thereby boosting its deterrent effect while improving the quality of investigations and victim support services;
- Stopping the dismissal of driving which has caused clearly foreseeable danger as merely 'careless' driving; and
- Putting in place a sentencing framework which makes greater use of significant driving bans rather than custodial sentences, where the offender has caused danger but does not appear to represent an ongoing danger to the public. Custody should remain the primary sanction where the gravity of the offence or the attitude of the driver suggests a likelihood of re-offending, or where they have a record of past driving offences (particularly breaches of past driving bans) which suggests the need for public protection is better served by a custodial sentence than a driving ban.

We call on the MoJ to address the second and third bullet-points above through its long-promised review of road traffic offences and penalties. We urge that this review is informed by a full, open and participatory consultation process, to forge as strong a consensus as possible on the way forward, in an area of law whose history is littered with well-intentioned but failed reforms.

For more, see Cycling UK's briefings on roads policing, prosecution and the courts, and the legal framework and sentencing¹⁴.

We also urge DfT, the Home Office and MoJ to collaborate on improving the linkage of STATS 19 data (on the circumstances of road collisions, the types of road users injured and the severity of their injuries) and data from the criminal justice system on the offences prosecuted and convicted, and the resulting sentences. At present it is impossible to find out how many offences leading to cyclists' injuries (or serious injuries or fatalities) result in a driver being prosecuted or convicted, nor what sentences they receive, nor whether this varies in comparison with other road users (either as perpetrators or as victims).

Issue not covered: Highway Code review

The Highway Code (HC) is typically reviewed about every 7-8 years, however the last review took place in 2007. The changes made recently to traffic signing and regulation now increase the need to review the HC.

Cycling UK wishes to see the following issues addressed in this review:

- A clear statement that road users with the fastest or heaviest vehicles have a greater duty of care towards more vulnerable road users – at present, their responsibilities are presented as being equal.
- Remove or reword prejudicial rules on use of helmets and hi-visibility clothing. Whatever the merits or otherwise of helmets and 'hi-viz', it is surely unjust that the insurers of drivers involved in collisions with cyclists routinely use these HC rules to pursue 'contributory negligence' claims against their victims or their bereaved families. This causes huge distress and cost, and is simply not justified in safety terms.

¹⁴ These are all downloadable from www.roadjustice.org.uk/information/legal.

- A minimum passing distance, as called for in <https://petition.parliament.uk/petitions/128190>. Although we are dismayed at the Government's response, we are pleased that the Government is keeping its position on this under review. We believe it should be incorporated into the next HC revision.
- Priority rules at junctions (see response to 8.1.2).

Issue not covered: Driverless cars

The recent Queen's Speech included the announcement of the Government's intention to introduce a Modern Transport Bill, which will (among other things) facilitate the introduction of driverless cars.

The adoption of driverless cars could be either a huge benefit or a huge disbenefit for the promotion of cycling and cycle safety, depending on how it is done:

- It could lead either to large increases or large decreases in car ownership, depending on whether it makes car ownership normal among people who currently cannot drive (including children), or whether it substantially boosts the popularity of car-sharing clubs (enabling people to order a driverless car to come to their front door as easily as they can currently order an Uber car).
- Similarly it could hugely improve or worsen the safety and convenience of cycling. Fears that pedestrians and cyclists can simply run or swerve out in front of driverless cars – knowing that they would stop – could result in regulation that would severely restrict cycle movement. Conversely, the total adoption of driverless cars could mean motor vehicles being steered as precisely and predictably as if they were on rails. This would be extremely space-efficient, freeing up space for cycling. Further space could be freed up by reduction in car parking demand that would result from a marked shift from car ownership to car sharing clubs.

Cycling UK seeks assurances that driverless cars will not be permitted on roads other than motorways until it has been shown that they can reliably detect cycles and cyclists, and respond accordingly. Since cyclists negotiate for roadspace using eye contact, this is hugely important.

However, once the detection technology is reliable, we seek the rapid and complete introduction of fully driverless cars. We wish to minimise the time-period in which there is a mix of human-driven and driverless cars on the road, given that this transition phase will provide only disadvantages and no advantages for cycle use and cycle safety.

Better Mobility

8.17-8.22 Cycling and public transport

We agree that “ensuring a seamless transition from public transport to and from walking and cycling ... is key to increasing the number of walking and cycling stages to train stations and other transport interchanges.”

To promote the integration of cycling and buses, Cycling UK urges DfT to support trials of bike racks mounted on the fronts of buses, as practiced on the majority of urban buses in the United States. We believe this is vastly preferable to rear-mounted bus racks, as it improves safety and security against theft, while reducing the delays involved in loading and unloading the bikes. We believe that a DfT-commissioned study which identified potential risks from front-mounted bus racks was simply incorrect in its conclusions, and that further trials should be conducted. An opportunity to do so has recently arisen in Bath, where the local MP, council and bus operator are all supportive of the idea.

As regards cycle-rail integration, we support the new ATOC cycle-rail toolkit. We agree that significant growth in cycle-rail travel will come primarily from off-train solutions (i.e. parking or hiring cycles at the origin or destination station). We nonetheless believe there should be adequate space for carrying cycles – even if this goes hand in hand with reasonable rules to prevent cycle carriage on packed trains at peak times and locations. It should be possible to

reserve cycle spaces on any train services for which seats are also bookable (i.e. primarily longer-distance trains). For passengers with cycles who have not made advanced reservations (e.g. those whose travel arrangements could not be made in advance), the technology now exists to allow platform staff to check the availability of cycle spaces on a train shortly before its arrival, so that the passenger knows whether they can board the train, or whether they will need to lock it up at the station before boarding.

Given the evidence for the effectiveness (and indeed the excellent cost-effectiveness) of investment in cycle parking at stations¹⁵, we urge the reinstatement of a budget-line for door-to-door journeys.

We also call for the adoption of a performance indicator in the CWIS to monitor trends in cycle-rail travel, and the effectiveness of measures aimed at increasing this.

Finally, we urge action to integrate local hire-bike schemes with local public transport smartcards, thereby facilitating their use as part of a longer door-to-door journey.

8.23 Local Cycling and Walking Infrastructure Plans (LCWIPs)

We welcome the development of guidance to inform the preparation of Local Cycling and Walking Infrastructure Plans. However we are concerned that there is as yet no incentive nor any requirement to prepare them, let alone to implement them. Still less is there any reason for a disinterested authority to implement an LCWIP to high standards. Some authorities will doubtless prove excellent role-models. However Cycling UK believes that, with neither a requirement to implement them nor any funding to incentivise them, the coverage and quality of LCWIPs is likely to be seriously patchy, particularly outside the larger cities.

We believe the guidance should spell out that the Public Sector Equality Duty implies a duty on highway and planning authorities to progressively create the conditions where people with protected characteristics (e.g. younger people, older people and people with disabilities) are as able to travel by cycle as other groups. It should also set out the design standards which highway authorities need to achieve in order to demonstrate compliance with their duty under the Equality Acts to consider the needs of protected groups – including older and younger people as well as people with disabilities. This could be expressed as a scoring using Transport for London's 'Cycle Level of Service' (CLOs) tool (or similar) that needs to be met if the resulting infrastructure is to be useable by people of all ages and abilities. Lower scores would not be debarred but would need to be justified, perhaps with a commitment to take further steps to improve them at a later date, when more funding and/or political support is available.

The LCWIP guidance also needs to:

- Emphasise the need for councils to develop and secure public support for *comprehensive proposed local cycling networks*, together with core cycle route networks which will be prioritised for implementation to high standards. This should be done collaboratively, both with neighbouring authorities and with members of the public, who can provide valuable crowd-sourced information to help inform solutions and priorities for implementation. The network-planning process itself should also make use of the Propensity to Cycle Tool (<http://pct.bike>), whose development we strongly support.
- Encourage local councils to engage and seek the support of local people and groups with knowledge or interests in boosting cycle use. Information to help develop and prioritise individual schemes and/or projects can be crowd-sourced via tools such as the Cyclescape website (though Cycling UK is seeking to work with CycleStreets, the creators of Cyclescape, to improve its usability). Obtaining 'third party endorsements' for cycling plans can not only provide useful ideas for refining the initial proposals, while the involvement of local campaign groups can very usefully strengthen the authority's efforts to secure funding and/or to overcome local public opposition. We say more about this in our answers

¹⁵ Downloadable from www.stationtravelplans.com/guidance-and-reports?action=view&newsID=29.

to question 2 (see the section on the role of the voluntary and community sector) and Question 5.

- Provide *design standards and assessment tools* to ensure consistently high-quality and cost-effective cycle-friendly planning and design in the context of highways and other transport schemes, new developments and planned highway maintenance works. These can be based on the standards developed by Transport for London and the Welsh Government.

8.24 Support for LEPs through the Sustainable Transport Delivery Excellence Programme

Cycling UK supports this programme. However we believe it needs to be better resourced, so that support can also be provided for Combined Authorities, Sub-regional Transport Bodies, individual councils and potentially also for major developers.

To date, Local Enterprise Partnerships have shown little interest in funding active travel (see www.bettertransport.org.uk/media/26-09-2013-ltbs-report and www.bettertransport.org.uk/sites/default/files/research-files/sustrans_cfbt_sep_analysis_final.pdf).

There is also a risk that sub-national transport bodies (such as Transport for the North) focus on longer-distance travel, rather than local solutions that reduce the need for travel and which therefore boost the opportunities to make journeys by cycling and walking. Government needs to make LEPs, Sub-national Transport Bodies and others aware that it expects (not merely 'encourages') them to prioritise the development and implementation of local cycle networks in their areas, with an initial focus on core networks of high-quality routes in urban areas, together with links to key settlements in their rural hinterlands which are within a relatively easily cyclable range (up to c10km).

8.25 Support via the Cycle Proofing Working Group (CPWG)

Cycling UK is pleased to be a member of the Cycle Proofing Working Group. However the group has made slow progress, having so far only managed to draw up its remit and provide some good practice examples. We have yet to have fruitful discussions about design standards (other than to persuade DfT to provide endorsement for the London and Welsh design standards), nor to engage with the planning process, or to provide useful input to the revision of the UK Roads Board's advice on highway maintenance.

The two joint meetings held so far with the Cycling Cities group have highlighted that there is a good deal of common ground between the two groups. We therefore urge more frequent dialogue, as well as a widening of the Cycling Cities group to include other authorities, both urban and rural, who are keen to share and learn from best practice.

8.26 Behaviour change

Behaviour change programmes can be highly cost-effective measures at a small scale – for evidence, see Cycling UK's 'Smarter choices' briefing¹⁶. However, they should certainly not be seen as a substitute for investing in improved infrastructure. Evidence from the early phases of London's 'Cycle Superhighways' programme suggests though that they are particularly effective when provided in tandem with the creation of new cycle-friendly infrastructure.

Cycling UK also believes that the most effective 'smarter choices' measures are those which involve giving people a targeted opportunity to give cycling a try – e.g. cycle training or our own Big Bike Revival project – rather than those which rely purely on marketing and other appeals to 'hearts and minds.' The best way to influence people's hearts and minds is to given them a taster of the benefits of cycling. Moreover, the effectiveness of such measures is even greater if tailored for specific groups, e.g. the employees at a workplace, the parents and pupils of a school, for health patients, for women, for ethnic minority groups, for people with disabilities etc. There is real solidarity to be gained from discovering cycling in conjunction with other people like oneself.

¹⁶ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/smarter-choices.

Smarter choices do of course require revenue funding – and we reiterate our dismay at the 70% reduction in revenue funding available through the CWIS as compared with the previous funding through the Local Sustainable Transport Fund (LSTF).

We therefore urge DfT to renew its efforts to secure revenue funding from health budgets, not least given the opportunities to promote cycling among older people, people with disabilities, minority ethnic groups and people from deprived neighbourhoods. Focusing ‘smarter choices’ measures on these groups could be particularly effective in overcoming the lack of educational or employment opportunities and the associated economic under-achievement of these groups, as well as the greater burden of physical and mental ill-health among these groups.

For more, see www.cyclinguk.org/project/community-cycle-clubs.

8.27 Inter-Ministerial group on Clean Growth

We are interested to note the reference to this inter-ministerial working group. We request greater information about its membership and activities – this appears not to be publicly available¹⁷ – and whether it is a suitable ‘home’ for providing cross-departmental co-ordination of activities under the CWIS.

8.28 Role of employers

We urge that the Department of Business, Innovation and Skills (BIS) should take a more active role in promoting cycle-friendly employer initiatives, including workplace travel plans. These can include providing cycle access to, and parking or storage facilities at, workplaces; shower and locker facilities; incentive schemes; the provision of pool bikes and liaison with workplace-based Bicycle User Groups (BUGs). Cycling UK urges that the CWIS should include an active commitment from BIS to such initiatives – see also our response to Q2.

8.29 Role of DH, PHE and the health sector

We have noted above the potential role of the health sector in providing revenue funding to support behaviour change programmes. These should focus particularly on demographic groups who are under-represented in cycling. For more, see Cycling UK’s briefing on cycling and health¹⁸, also our comments on paragraphs 8.1.4-8.1.5 and our response to Question 4.

We also urge the health sector to promote cycling for its own employees, noting that the NHS is itself Europe’s largest employer, with 1.3 million employees. For more information, see our briefing on the role of health sector bodies in promoting cycling among their patients and staff¹⁹.

8.30 Evidence base

Cycling UK agrees on the need to evaluate the cost-effectiveness of different interventions. However we do not believe there is any need for further evidence of the overall value-for-money of investing in cycling. The evidence on this, including Government-commissioned evidence²⁰, is overwhelming. We simply need ministers to take heed of it and allocate funds accordingly.

8.31 E-bikes

There is good evidence (from Germany, the Netherlands and elsewhere²¹) that the widespread adoption of e-bikes helps boost cycle use and reduce CO2 emissions, as follows:

- Enabling older people and/or people with disabilities to cycle without fear that they will be left stranded if they suffer injury or if their energy fails them, particularly on hills.

¹⁷ See www.businessgreen.com/bg/analysis/2445289/amber-rudd-declines-to-reveal-details-of-secretive-clean-growth-committee.

¹⁸ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/health-and-cycling.

¹⁹ Downloadable from www.cyclinguk.org/article/campaigns-guide/promoting-cycling-in-health-sector.

²⁰ See www.gov.uk/government/publications/cycling-and-walking-the-economic-case-for-action and www.gov.uk/government/publications/the-value-of-cycling-rapid-evidence-review-of-the-economic-benefits-of-cycling.

²¹ See www.carplus.org.uk/project_page/electric-bikes-a-summary-of-existing-research/.

- Enabling people of all ages to cycle for longer journeys than they might otherwise make.
- Substantially reducing CO2 emissions compared with the equivalent travel by electric cars.

The potential for e-bikes to encourage increased physical activity and improved health among older people is being documented by the CycleBOOM project²², whose final results are due out in September. This would be a timely moment for the Government to commit a proportion of the funding allocated to the Office of Low Emissions Vehicles (OLEV) to promoting e-bike use in the UK. The UK market for e-bikes is seriously under-developed compared with countries like Germany and the Netherlands.

8.32 Cycles as mobility aids

Cycling UK strongly welcome commitment to raise awareness of the use of cycles as mobility aids. As well as minimising the use of 'cyclists dismount' signs in public places, there is also a need to facilitate the carriage of cycles used as mobility aids on public transport services.

Better Streets

8.34-8.36 Quality street design and 'shared space'

We have previously called for CWIS to include a commitment to adopt clear and consistent standards for cycle-friendly planning and design for use throughout the country. These should cover not only the planning and design of highway and traffic schemes but also new developments (including cycle parking and trip-end facilities like showers), as well as planned road maintenance works. They should not only promote good practice but also to put an end to the widespread bad-practice which is endemic in this country. The existence of a plethora of guidance notes to choose from merely creates confusion, while allowing highway authorities and others to select low standards whenever these mean that cycle facilities (however useless) can be introduced more easily or cheaply.

8.37 20mph zones and limits

Cycling UK welcomes this statement of the benefits of 20mph limits as well as zones. We also agree that local bodies are best placed to determine the speed limits for their areas. However we do not agree that the default setting for urban streets should be 30mph, with 20mph being an exception that requires exceptional signing. We believe instead that 20mph should be the normal limit for built-up streets, with conscious decisions (and signing) being required for streets with higher (or indeed lower) limits. This would help normalise 20mph speed limits and zones, creating the potential for significant further reductions in ill-health, road danger, pollutant and greenhouse emissions.

8.38 Parking restrictions

In relation to parking restrictions, we believe it is high time the Government enacted Part 6 of the Traffic Management Act 2004. This would (among other things) allow councils to take on responsibility for preventing parking in mandatory cycle lanes. This is currently left to the police, even where they have been stripped of all other parking responsibilities (and hence where they have probably made all their parking wardens redundant).

8.40 Rights of Way Improvement Plans

Cycling UK believes that Rights of Way law in England requires a fundamental overhaul, to bring in a 'right of responsible access' across all open land that is not clearly within the curtilage of a building, or which is not required at the time for forestry operations, shooting or other activities requiring occasional short-term exemptions. Such rules have been successfully adopted in Scotland²³, while the Welsh Government has consulted on the possibility of following Scotland's lead²⁴. Cycling UK believes England should do likewise.

²² See www.cycleboom.org.

²³ See www.cyclinguk.org/campaigning/views-and-briefings/scotlands-land-reform-act-2003-and-outdoor-access-code.

²⁴ See www.cyclinguk.org/campaign/trails-wales.

8.41-8.42 *Review of the planning system / Designing cycling into new housing developments*
Cycling UK welcomes the commitment to “ensure” that new housing developments both large and small, are designed in accordance with the principles of Manual for Streets and subsequent guidance. However the CWIS needs to spell out how the Government will ensure this. We believe this will require mandatory guidance, or at least the ability for local authorities to bring legal challenges against developers who do not do this, and/or for concerned citizens to bring such challenges where the local authority is unable or unwilling to do so.

Question 2: The Government would be interested to hear views on the potential roles of national government departments, local government, other public bodies, businesses and the voluntary sector in delivering the strategy and what arrangements could best support partnership working between them.

National Government

Whilst the lead responsibility for the Cycling and Walking Investment Strategy will rightly sit with the Department for Transport, the cross-departmental and cross-sectoral nature of the actions required, and the benefits to be realised, mean that it requires explicit backing from the top of Government. The Prime Minister needs to ensure that the Strategy has cross-departmental buy-in, with individual departments playing the following roles:

Department for Transport (DfT):

- Developing the CWIS, including its objectives and targets.
- Integrating the aims of the CWIS into wider transport and land-use policy frameworks, in order to reduce the need for travel, especially by private car.
- Identification of funding available and allocation of this to programmes and projects, informed by the proposed expert group.
- Ensuring that other Government departments and other public, private and voluntary sector bodies play their part in delivering the strategy, providing financial contributions as appropriate.
- Drawing up and delivering cycle-friendly design standards to ensure that all highway and traffic schemes, new developments and planned highway maintenance schemes are ‘cycle-proofed’ to high standards.
- Integrating these standards into wider design guidance and standards, e.g. the revision of Well Maintained Highways.
- Drawing up and delivering complementary cycle safety policies, e.g. on speed limits, traffic law and enforcement and lorry safety (including the role of the Traffic Commissioners).
- Ensuring integration of cycling and public transport (including buses, transit, aviation and shipping as well as trains).
- Monitoring of progress and updating the CWIS in the light of experiences gained and the input of the Expert Committee and others.

For more, see Cycling UK’s briefing on national transport policy²⁵.

Department for Communities and Local Government (CLG)

- Integrating the aim of ‘cycle-proofing’, and specifically the process of drawing up LCWIPs’ into national planning and development control policy documents, and advising local authorities of the need to do likewise at the local level.
- Ensuring that national and local parking policies support the wider aim of motor traffic restraint.
- Monitoring whether new developments are being designed to high-standards of cycle-friendly design and accessibility, including residential and other cycle parking.

See Cycling UK’s briefing on national planning policies.²⁶

²⁵ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/national-transport-policy-cycling.

²⁶ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/national-planning-policies.

Departments for Education (DfE) and for Business, Innovation and Skills (BIS)

- Promoting cycle-friendly schools and colleges (DfE) and cycle-friendly employers (BIS) respectively. Curriculum time should be made available for cycle training for pupils of both primary and secondary school age. Employers should be encouraged to promote workplace-based programmes which enable and incentivise employees to 'give cycling a try', such as financial rewards for not using valuable car-parking space, offering adult cycle training and pool bike schemes.

See Cycling UK's briefings on cycle friendly schools and employers²⁷.

Department for Health (DH):

- Providing direct support for nationally-coordinated behaviour-change programmes which can improve the physical or mental health of their beneficiaries. These should be targeted particularly for those who are inactive or otherwise leading unhealthy lives.
 - Promoting awareness among doctors, commissioning groups, public health directors and health-sector employers of the roles they can play in promoting active travel, both for their populations and their own staff.
 - Ensuring the NHS and other health-sector bodies are themselves cycle-friendly employers.
- See Cycling UK's briefings on cycling and health, and on promoting cycling in the health sector²⁸.

Department of Culture Media and Sport (DCMS) and Sport England

- Providing direct support for nationally-coordinated behaviour-change programmes which can improve the physical or mental health of their beneficiaries, particularly those from disadvantaged backgrounds.
- Maximising the value of sports-cycling as a means to promote regular cycling, whether for school, work or other day-to-day trip purposes.

Department of the Environment, Farming & Rural Affairs (DEFRA) and Ministry of Defence (MoD)

- Promoting cycling as a response to air pollution and other adverse environmental impacts.
- Improving access to off-road cycling opportunities, by reforming rights of way law and by promoting cycling in national parks, the Forestry Commission estate, the MoD estate, alongside the coast and inland waterways. This should include the 'cycle-proofing' of flood defences, thereby maximising their potential additional value as cycle facilities.

Home Office (HO) and Ministry of Justice (MoJ)

- Strengthening the resources for, and quality of, roads policing, including the training of police, the investigation procedures they follow (for non-fatal as well as fatal injuries) and the victim support services they provide.
- Reforming the framework of road traffic offences and sentences so that driving which has caused obviously foreseeable danger is no longer dismissed as mere 'carelessness'.
- Reforming sentencing to make greater use of driving bans in cases where serious harm has been caused but where the convicted driver does not obviously need to be locked up for public protection. Custody should however remain the primary sentencing option for drivers whose offence, attitudes or past offending history (including breaches of past driving bans) suggests that this is necessary for public protection.

See Cycling UK's various briefings related to its Road Justice campaign²⁹.

²⁷ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/cycle-friendly-schools-and-colleges-ctc-views and www.cyclinguk.org/campaigning/views-and-briefings/cycle-friendly-employers-ctc-views respectively.

²⁸ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/health-and-cycling and www.cyclinguk.org/article/campaigns-guide/promoting-cycling-in-health-sector respectively

²⁹ Downloadable via www.roadjustice.org.uk/information/legal.

The Police, Police and Crime Commissioner (PCC), Driver and Vehicle Standards Agency (DVSA), Health & Safety Executive and Traffic Commissioners

- The Police and PCC should liaise to ensure that road traffic policing has adequate priority and resources, with police officers and PCSOs being given adequate training.
- The Government should encourage collaboration and data-sharing arrangements between the above enforcement bodies, in order to investigate suspect vehicle operators, so that their licences can be swiftly withdrawn if necessary.

See Cycling UK's briefing on traffic policing and other enforcement bodies.³⁰

Local Government, including Combined Authorities

- Draw up, consult on, implement and monitor local cycling and walking strategies, including Local Cycling & Walking Infrastructure Plans (LCWIPs), as well as complementary measures to improve cyclist safety and to promote cycle use among diverse demographic groups.
- Integrate transport, land use and development control policies to (a) guide significant new developments to locations where they are (or can be made) readily accessible by cycling and other sustainable transport modes; (b) secure provision for cycle access (both to/from and within the development), parking and storage and other 'trip end' facilities (e.g. showers and lockers); (c) agree (and, where relevant, monitor) travel plans with developers and others – see the section on schools, colleges, employers and developers below.
- Ensure that other highways, transport, rights of way, planning and highway maintenance projects and schemes are "cycle-proofed", i.e. that opportunities to improve cycling conditions are consistently identified and implemented wherever possible.
- Engage with other partners, including neighbouring authorities, schools and colleges, employers, public transport operators, local voluntary sector groups and the wider public.

See Cycling UK's briefing on local transport³¹.

Local Enterprise Partnerships (LEPs)

- LEPs should proactively seek to support the development of cycle facilities and networks, particularly where proposed through Local Cycling and Walking Infrastructure Plans (LCWIPs).

Schools, colleges, employers and developers

- Businesses and developers should liaise with local authorities and, where relevant, with their employees and others, to improve cycle access to and within their sites, and to provide appropriate levels of well-designed and accessible cycle parking, storage and other facilities (e.g. showers), for employees and visitors alike.

Again, see Cycling UK's briefings on cycle friendly schools and employers³².

Public transport operators

Depending on the type of service, public transport operators and local authorities should liaise to ensure:

- Safe and convenient access to, from and within public transport stations/interchanges.
- Well designed, convenient and secure cycle parking and/or hire and storage facilities.
- Space for carrying cycles on public transport services, with reservation facilities available (but not compulsory) on any service for which seats are also bookable. The use of this space may if necessary be governed by reasonable rules to manage peak-time demand.

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

³¹ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/cycling-and-local-transport.

³² Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/cycle-friendly-schools-and-colleges-ctc-views and www.cyclinguk.org/campaigning/views-and-briefings/cycle-friendly-employers-ctc-views respectively.

- Clear, readily accessible information on the availability of cycle carriage, parking, hire and storage facilities, and how to use these (including where to stand on rail platforms to access the cycle spaces on trains).
- Monitoring of the use of the cycle / public transport combination, and the cost-effectiveness of measures to boost this.

The voluntary and community sector

Voluntary sector bodies, local community groups and interested members of the public can play roles such as:

- Delivering or contributing to a range of projects to get more people cycling;
- Monitoring, and making simple improvements to, the quality of cycle provision (particularly off-road tracks).
- Providing local knowledge and input to help develop or refine local transport, planning, road-safety or cycle-specific strategies and plans, local cycle networks and individual infrastructure schemes (including roads and traffic schemes, new developments and planned road maintenance works), public transport integration initiatives, public awareness campaigns (including on road safety issues) and traffic law and enforcement.

We are pleased that the Department has asked Question 2. We believe the final CWIS would benefit from a clear statement of the roles to be played, and the resources to be committed, by these various partners, notably from other Government departments.

Our response to question 5 describes in more detail how local cyclists and/or cycle advocacy groups can contribute to the development of Local Cycling and Walking Infrastructure Plans (LCWIPs), and the prioritisation and design of schemes to deliver those networks, using the planning tools referred to in our earlier response to paragraph 8.23.

Question 3: The Government would be interested to hear suggestions and evidence of innovative projects and programmes which could be developed to deliver the objectives outlined in Section 4.

Our responses to question 1 have already highlighted a number of innovative projects and programmes. We would specifically highlight:

- Use of the Propensity to Cycle Tool (<http://pct.bike>) to support the development of local cycle route networks, plus the use of Cyclescape and a 'Rate my Route' tool to 'crowd-source' user feedback to inform priorities and support for funding submissions – see our response to Question 5.
- Regulations to permit 'cycle scrambles' or 'all green phases' at traffic lights.
- Promoting the adoption of 'direct vision' lorries, with DfT showing leadership by seeking (and in due course requiring) their use for construction work on the HS2 rail scheme and on Highways England projects.
- Cycling UK's Big Bike Revival project (www.cyclinguk.org/project/big-bike-revival).

Question 4: The Government would be interested to hear your views on how to increase cycling and walking in typically under-represented groups (for example women, older people, or those from black, Asian or minority ethnic backgrounds)

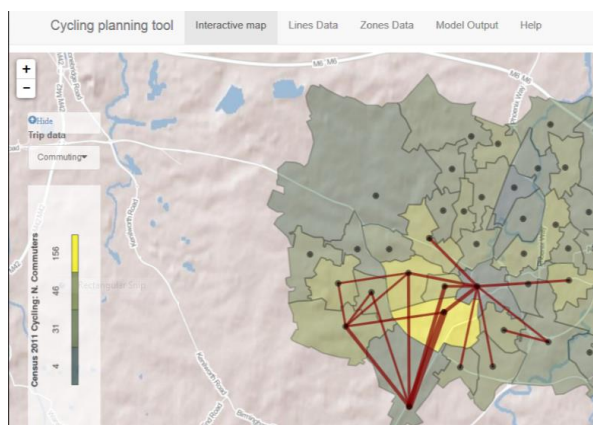
We have already highlighted the value of targeted 'smarter choices' measures at groups who are under-represented in cycling. Cycling has the potential to open up educational and/or employment opportunities which might be otherwise hard to access, thereby increasing their chances of fulfilling their economic potential. It can also address the greater prevalence of both physical and mental ill-health among these disadvantaged groups, reducing both their own suffering and that of their families or carers, and the societal costs of ill health.

Evidence of effective measures is provided in Cycling UK’s smarter choices briefing³³, as well as on the webpages for our Community Cycle Clubs and Big Bike revival webpages³⁴.

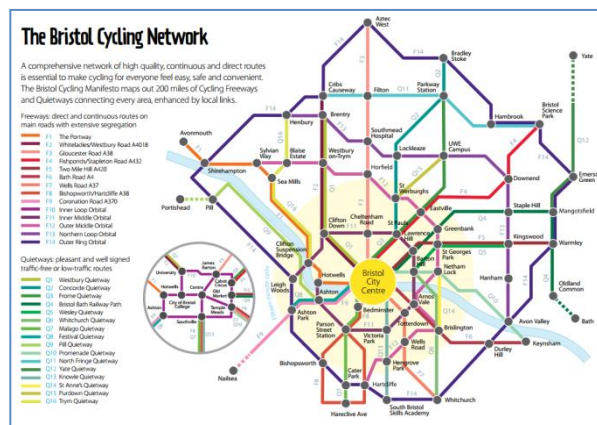
Question 5: The Government would be interested to hear views on what type of assistance Local Authorities and Local Enterprise Partnerships would find beneficial to support development of ambitious and high standard Local Cycling and Walking Infrastructure Plans

In response to paragraph 8.23, we highlighted three IT tools that could be valuable to local authorities in developing their Local Cycling and Walking Infrastructure Plans (LCWIPs):

- The Propensity to Cycle Tool (<http://pct.bike>), for identifying the route corridors with greatest short- and long-term potential for increased cycle use, and hence the identification of a network of core ‘desire lines’ that need to be met in planning a local cycle network.



The output from the Propensity to Cycle Tool



A ‘tube network’ map of potential Bristol cycle routes, proposed by the Bristol Cycling Campaign and adopted by the City Council

- The Cyclescape tool (www.cyclescape.org), developed by CycleStreets (www.cyclestreets.net), as a means to crowd-source ideas and priorities for improving local cycling conditions.
- A means for more engaged local cycling advocates to rate the quality of cycling conditions on road or cycle-route sections. This could be based on either the Cycle Level of Service Tool from Transport for London’s London Cycling Design Standards, or the equivalent assessment tool from the Welsh design standards, or the Cycling Environment Assessment Tool developed by Cyclenation.

Either way, Cycling UK is keen to work with local authorities to establish constructive dialogues between local cyclists, campaigners and campaign groups and their councils, combined authorities and LEPs, as part of the national Space for Cycling campaign which Cycling UK is looking to co-ordinate in conjunction with local campaigners and campaign groups from Cyclenation, the Cycling Embassy of Great Britain and others. We aim to play a constructive role in forging agreements on the planning of core cycle networks, then to develop and prioritise plans for the routes and schemes needed. We hope this process will help secure demonstrable public backing for the resulting funding proposals to LEPs and other sources. We are keen to discuss further with DfT how the Space for Cycling campaign could be integrated into the LCWIP process.

Roger Geffen
Policy Director, Cycling UK
May 2016

³³ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/smarter-choices.

³⁴ See www.cyclinguk.org/project/community-cycle-clubs and www.cyclinguk.org/project/big-bike-revival.