

Transport for London's Draft Cycle Safety Action Plan (CSAP) Consultation response from CTC, the national cycling charity

CTC, the UK national cycling charity, was founded in 1878. CTC has 67,000 members and supporters, provides a range of information and legal services to cyclists, organises cycling events, and represents the interests of cyclists and cycling on issues of public policy.

CTC welcomes the opportunity to comment on the draft of the new Transport for London (TfL) Cycle Safety Action Plan (CSAP). The draft published for public consultation contains much that we welcome, and is a great improvement on earlier stakeholder drafts. We are pleased that many of the concerns expressed over earlier drafts by CTC, the London Cycling Campaign (LCC) and others have been taken on board.

Where we have not commented below, our silence may be taken as assent.

Chapter 1: Setting the scene

Page 3 paragraph 3

The first sentence of this paragraph rightly cites various planned programmes for infrastructure improvements, including “new Cycle Superhighways, a network of new backstreet Quietways, a central London grid of linked cycle routes and greater segregation of cyclists from traffic where necessary and appropriate”. The next sentence then refers to “a major programme of work ... to target some of the worst junctions for cycling in London and to improve their safety”.

This is welcome, however we suggest that junction redesigns need to retain or (preferably) improve cyclists' priority, as well as their safety. This is consistent with the inclusion of directness, comfort and coherence among the 6 criteria for assessing the quality of cycle provision, as proposed in the draft London Cycling Design Standards. We therefore propose adding the words “and priority” at the end of this paragraph.

Page 3 paragraphs 4 and 5.

CTC has consistently voiced concern over TfL's target to reduce the numbers of people killed and seriously injured (KSI) by 40% by 2020, as it takes no account of the quintupling of cycle use also envisaged by TfL. As TfL's figures show, the numbers of KSI injuries to motor vehicle occupants has fallen sharply while KSIs to vulnerable road users (VRUs, particularly cyclists and motorcyclists) have remained comparatively unchanged. As a consequence, the proportion of London KSIs accounted for by VRUs has increased from 54% in 1994-98 to 80% in 2012, comprising 37% pedestrians, 22% cycles and 21% powered two wheelers¹ (n.b. it should be remembered that cycle use has increased significantly in that time, so the risk of cycling has fallen, however it remains the case that cycling now represents a much greater proportion of KSIs than in the 1990s).

It is therefore hard to see how a quintupling of cycle use can be achieved together with a 40% reduction in KSIs, unless there was also to be a sharp reduction in walking (which would also be undesirable), or a drastic reduction in motor traffic (which would be highly desirable, however TfL does not have plans in place to achieve this).

Another way of looking at the problem is to consider what would happen if there was to be a 40% reduction specifically in cyclist KSIs, as well as a quintupling of cycle use. This would

¹ See <https://www.tfl.gov.uk/cdn/static/cms/documents/safe-streets-for-london.pdf> p16 and <http://www.tfl.gov.uk/cdn/static/cms/documents/collisions-and-casualties-2012.pdf> table 3.1.

mean that cycling would be 8.3 times as safe per mile (or per trip) as at present. Other figures suggest that the risk of cycling in London is about 2-3 times higher than in Dutch or Danish towns and cities. The combined effect of TfL's targets for cycle use and cycle safety would therefore require it to become around 3-4 times safer than it currently is in those countries.

CTC would of course love to see this happen, but fear that it is an unrealistically high expectation. Given that the health benefits of cycling far outweigh the risks involved, it is far more important for public health to achieve the target to quintuple cycle use. We clearly also want to see a corresponding reduction in the risk per mile or per trip cycled, however this might in practice only mean stabilising the total number of cyclist KSIs, or even allowing some increase. There is a risk that being overly ambitious in seeking to reduce cyclist KSIs in absolute terms could undermine the aim of increasing cycle use. Moreover, the latter is more important in terms of overall public health – i.e. if actions aimed at casualty reduction were to undermine the growth of cycle use, this would result in a net increase in lives lost, given the extent to which the health benefits of cycling (in terms of increased life expectancy) far outweigh the risks involved.

CTC therefore reiterates its plea to TfL to rethink its KSI reduction target. Any KSI reduction target that encompasses cycling (and indeed walking) should be rate-based (i.e. it should be to reduce the risk of cycling KSIs per mile or per trip cycled), so that aiming to achieve it is not at odds with the aim of boosting cycle use.

At the very least, we urge the addition of the words “in ways which support the growth of cycling” after “meeting this casualty reduction target” in the 5th paragraph of this page.

Page 4, 1st paragraph after the numbered bullet-points

“...road safety is a shared responsibility.”

This is true, however it is not an *equally* shared responsibility.

For one thing, police data show that, in collisions between cycles and motor vehicles, responsibility is about 3 times more likely to be attributed solely to the driver as to the cyclist. For another, it is not reasonable to expect a child cyclist to bear the same level of responsibility as a trained adult driver, particularly if they are driving a lorry or other large vehicle.

We therefore suggest adding, “Motorists and motorcyclists, particularly the drivers of large vehicles, need to be mindful of their responsibilities for the safety of more vulnerable road users travelling on foot or by cycle, particularly children and older people. However it is also valuable to raise awareness among those who cycle, or who are thinking of taking up cycling, of what they can do to maximise their own safety.”

Page 4 penultimate paragraph

We welcome the acknowledgement of the role of CTC and other cycling / road safety stakeholders in informing the Plan. We would however ask to be correctly named, as “CTC, the national cycling charity”. It is 12 years since we ceased using the name “Cyclists’ Touring Club” for anything other than our official Companies House or Charities House registration.

Chapter 2: “More and safe cycling”

Paragraph 2, line 1.

We suggest amending “even while” to say “at a time when” – and then to change “have risen” to “were rising”.

It is not surprising that cycle safety is improving at a time when cycle use is increasing. There is good evidence from both international and UK-based comparisons that high or rising cycle use is typically associated with better cyclists’ safety – the “safety in numbers” effect. Hence TfL is right to aim for ‘more’ and as well as ‘safer’ cycling.

Criticisms have rightly been levelled at abuses of the ‘safety in numbers’ theory, i.e. where it has been claimed that cycle safety can be improved simply by increasing cycle use. CTC has always argued that, although the ‘safety in numbers’ evidence clearly shows that more and ‘safer’ cycling can and should go hand in hand, action must be taken to tackle the actual and perceived risks of cycling, to ensure that this synergy occurs in practice. This redrafted CSAP clearly recognises this point, placing it above those criticisms. Hence there is no need to suggest that the improvement in cycle safety is happening in spite of an increase in cycle use. On the contrary, it is reasonable to expect this, and (more importantly) to anticipate that it will continue to happen if the steps proposed in this action plan are followed.

Section 2.4 (p 9-10)

Comparing cycle safety in different places on the basis of casualties, KSIs or fatalities per head of population is statistical nonsense, as it takes no account of differences in the levels of cycle use among those different populations. Hence the whole of this section, including the graph, should be removed and replaced with a comparison of risk per mile, per trip or per hour. Risk per head of population should not be used as a basis of comparison in any circumstances.

Page 10, paragraph 2.

“Policies seeking both a growth in cycling and a reduction in cyclist casualties are not incompatible, as long as the safety of cyclists is given priority...”

We suggest phrasing this more confidently, for the reasons given in our first comment on Chapter 2. However it is worth mentioning the need to tackle both actual and perceived safety to ensure this synergy. We therefore suggest the following wording:

“International and UK-based comparisons show that both a growth in cycling and a reduction in cyclist casualties are entirely compatible, as long as the actual and perceived safety of cyclists are given priority...”

Chapter 3: Understanding the causes

Roads policing, and particularly the section on Operation Safeway (page 22)

Chapter 3 contains a good deal of useful analysis. We are pleased that TfL has evidently now taken on board the point that actions to tackle cycle safety need to be based on good evidence and analysis of the most serious causes of danger. This is very positive progress.

We are now concerned to ensure that the Met Police start to take a similar approach. CTC has welcomed the increase in roads policing resources arising from Operation Safeway, however we are very concerned that some of this effort is being misdirected at trivial

misdeemeanours by cyclists with no negative safety consequences, at a time when the Met is still severely resource-constrained in its ability to tackle more serious road crime, including speeding, mobile phone use and a host of lorry offences.

We therefore propose that a section should be added to this chapter, setting out what is known about the degree to which law-breaking by drivers and cyclists alike is known to contribute to cyclists' own and other road users' casualties.

It could note for instance that:

- Of the c450 pedestrians injured in collisions on London's pavements each year, around 2% involve cycles, the other 98% involve motor vehicles. Similarly, of the c100 pedestrians injured in London each year due to someone jumping a red light, just 4% involve cycles, the other 96% involve motor vehicles².
- Westminster City Council's draft Cycling Plan 2013-26 revealed that, in collisions between drivers and cyclists in the City, the police attributed responsibility to the driver in two thirds of cases, and to the cyclist in just one fifth of cases. Similarly, in pedestrian/cyclist collisions, the police attributed responsibility to the pedestrian in three-fifths of cases³. This reflects similar national figures – for more information see ⁴.

None of the above exempts cyclists from the need to act responsibly, nor does it in any way contradict the case for police action against irresponsible cycling. CTC wishes to be supportive of Operation Safeway (page 22), as we strongly believe in increased roads policing – indeed we have repeatedly voiced concern over the 29% drop in roads police numbers in Britain within 10 years, with the Met's road police numbers having fallen by 43%⁵.

However, at a time when roads policing resources remain constrained, it does the Met Police no credit whatsoever when the Cyclists' Defence Fund has to step in to challenge a fine issued to a cyclist for stopping beyond an Advance Stop Line which was blocked by a driver (as happened with Alex Paxton), or for straying marginally from a woefully substandard and poorly signed pavement cycle track (as happened to Kristian Gregory, as part of Operation Safety). We are also aware of an allegation from cyclist that she was physically stopped and injured by a police officer for no other reason that she was not wearing a helmet during Operation Safeway. We are very doubtful of the claim in this paragraph that "Officers enforced against behaviour that creates risk and danger on London's roads". We are further concerned to note that the police in West Norwood are planning action to "make sure cyclists are wearing helmets", even though this is not a legal requirement, and despite strenuous debate over the effectiveness or otherwise of cycle helmets (see <https://twitter.com/CroydonCyclists/status/493036643876880385/photo/1>). We believe the Met has a long way to go to demonstrate that it is taking a genuinely evidence-led approach to cycle safety.

We therefore call for this chapter to include a section analysing the available data on law-breaking and cycle safety, to help inform the police in drawing up evidence-based roads policing priorities, in the same way that TfL is now taking an increasingly evidence-led approach to prioritising its own cycle safety actions.

² See http://www.ctc.org.uk/sites/default/files/file_public/cyclists-behaviour-and-lawbrf.pdf p5.

³ See <http://bit.ly/1pv51Kz> p 33.

⁴ See <http://www.ctc.org.uk/blog/roger-geffen/boris-wildly-wrong-to-claim-23-serious-and-fatal-cycling-injuries-are-due-to-law-b>

⁵ See <http://www.ctc.org.uk/traffic-police-numbers-fall-29-in-10-years> and

Subsection on 'ethnicity' (bottom page 12 to top page 13).

We note the finding that Black, Asian and Minority Ethnic (BAME) road users face higher risks on the roads regardless of their mode of travel, and that BAME cyclists have approximately twice the risk of non-BAME cyclists. We agree that this requires further investigation but urge caution with this information. It is also known that people from lower income groups more generally face significantly higher risks compared with those from more affluent groups. Hence it may be that these data simply reflect the higher deprivation levels among BAME groups, rather than any distinct road-safety-related problem specifically affecting BAME groups. The issue needs to be handled sensitively and with clear, demonstrable objectivity.

Chapter 4: Actions

N.B this section includes a number of comments relating to lorry safety issues which have already been submitted as part of a joint submission prepared by the Action on Lorry Danger (ALD) group, which comprises the London Cycling Campaign, Living Streets, British Cycling and RoadPeace. These are prefaced below by “[ALD]”

Introduction: Recent progress

Page 26: “Working in partnership”

CTC welcomes much of TfL's work in recent years to promote good practice on cycle safety among fleet operators, and particularly the construction logistics sector. We particularly welcome TfL's initiatives to promote cycle safety when procuring contracts involving lorry fleets, and its encouragement for the London boroughs and other bodies to do likewise.

It was regrettable that TfL's publication “Improving road safety through procurement” was marred by advice to fleet operators to place cycle safety warning stickers on the backs not just of lorries but also small vans. This undermines the original purpose of these stickers – which was to advise cyclists to against under-taking large vehicles with blind-spots on the inside. Whilst we believe the ultimate solution is to redesign the cabs of large lorries and/or to limit their access to busy streets at busy times (see actions XX), the only “quick win” for improving cycle safety in the shorter term is through education of lorry drivers and cyclists alike. It was on this basis that CTC was willing to support the original sticker – although we would prefer less prescriptive warning (e.g. “Cyclists beware” rather than “cyclists stay back”).

What CTC could not accept was the use of these stickers not just on the rear left of large lorries but in all sorts of locations on a whole range of vehicles, including small vans. As a result, the sheer ubiquity of the stickers means they are far less likely to be noticed when they matter (i.e. on large lorries). At the same time, it is also very clear that some drivers view these stickers as legitimising an attitude that it is for cyclists to stay back, and if a cyclist gets caught by them turning left, then it is the cyclist's fault. This message is dangerous and is entirely contrary to the messaging which we need to be getting through to drivers about cyclists' priority at junctions, if high-quality segregated cycle provision is to work as well in the UK as it does in continental Europe.

We are pleased that TfL has now accepted the need to revise its guidance on the use of these stickers, and to use different wording on lorries and buses respectively. We urge that “Improving safety through procurement” and other publications containing the unhelpful advice on the use of stickers should be revised at the earliest possible opportunity.

Actions 1-7: Designing safe streets for cycling

Action 1: Deliver the infrastructure programmes in the Mayor's Vision for Cycling in London

CTC welcomes the restated support for the central London grid, new and upgraded Cycle Superhighways, 'mini-Hollands and junction improvements.

We urge that the Plan should also reference the need to rework large one-way / gyratory systems. These can be both intimidating and dangerous, as well as undermining the directness, attractiveness and convenience of cycling journeys. See also action 4.

Action 2: Publishing the revised London Cycling Design Standards (LCDS)

Action 3: Encourage best practice in applying LCDS on TfL and borough roads

CTC welcomes the publication of the consultation draft of the new LCDS. Whilst we have yet to form a definitive view on the publication as a whole, our early impressions are largely positive. We are especially keen to see how the Level of Service (LoS) approach works in practice, as this appears to be a particularly promising development.

Action 4: Prioritise TfL's road safety engineering programme on locations affecting vulnerable road users

CTC welcomes this action. We believe it is entirely justified, given that recent years have seen far less progress in improving safety for the most vulnerable. As noted previously, falls in KSI injuries to motor vehicle occupants mean that the proportion of KSI injuries suffered by vulnerable road users (pedestrians, cyclists and motorcyclists) has risen from 54% in 1994/8 to 80% in 2012.

As a point of detail, we suggest adding the words "conditions for" before "vulnerable roads". Cycling per se is a safe activity, posing little danger either to cyclists themselves or to other road users. It is cycling conditions which need to be made safer.

Action 5: Monitored trials of 20mph on Blackfriars and London Bridges, plus encouragement for borough 20mph schemes.

This action is welcome as far as it goes. However CTC urges that the aim should be to go further, encouraging the boroughs to move towards 20mph being the norm for urban streets. Given that most of the length of the road network is local streets rather than major through roads, the aim should be on faster/busier main roads should progressively become the exception rather than the norm.

We would also advocate the removal of centre lines on roads where the 20mph limit applies as a normal practice, for TfL and the boroughs alike. Over time, this would help create an association in the minds of drivers between centre lines / lane markings and higher speed limits. The removal of white lines is itself known to have a 'psychological traffic calming' effect.⁶

Having said this, there is a balance to be struck when it comes to 20mph schemes on main roads. On the one hand, CTC is keen to see greater use of 20mph limits without physical traffic calming on streets where typical traffic speeds are already low – in these circumstances, 20mph schemes can often be implemented simply with 20mph roundels and the removal of centre line markings, i.e. without the costs and unpopularity of physical

⁶ See

www.20splentyforus.org.uk/UsefulReports/TRLReports/Psychological%20traffic%20calming_TRL_2005.pdf

humps, cushions etc. On the other hand, 20mph limits using signing only are likely to prove inadequate on roads which are straight, wide and which retain the white-lining associated with higher speeds. So, whilst we welcome the proposed trials, we would caution that TfL may need to introduce more comprehensive physical treatments on main roads if 20mph limits are to work as intended.

Action 6: Inspecting and maintaining TfL roads to higher standards

The needs of cyclists should be reflected in TfL's and the boroughs' procedures for reporting, inspecting and repairing defects, and in the management of street works, winter maintenance, debris/vegetation clearance and lighting policies. This is an area where the draft LCDS needs strengthening (so far, it only really covers streetworks). The need to incorporate cyclists' safety into all of the above processes should be reflected in the revised CSAP.

CTC also strongly urges TfL to adopt a procedure for linking its cycling and planned road maintenance programmes, in order to maximise the opportunities for cost-effective synergies between the two. New York's Department of Transport introduced many of its recent pilots of light segregation (e.g. using traffic wands or planters) at the same time that the road in question was being resurfaced anyway. This enabled quality segregated facilities to be implemented at only marginal extra cost. We understand that Plymouth City Council and the London Borough of Hounslow are adopting a similar approach. We strongly advocate its use more generally.

Actions 8-14: Safe vehicles on our streets

Action 8: The Mayor's 'Safer Lorry Scheme'

[ALD] We support this and look forward to being consulted on details, particularly of the "appropriate safety measures".

Action 9: Trialling safety technology for buses

[ALD] We would like to see ISA trialled on lorries in London, where the updated digital speed map is now available. Most collisions by lorries with cyclists occur at slow speeds, but fast moving lorries are intimidating and deter the new cyclists envisaged by the Mayor.

Action 10: Partnerships to improve vehicle and driver safety standards in the freight, fleet and construction logistics industries

[ALD] We welcome the actions under this heading but think they should be enforced by use of the procurement process and given greater transparency. Specifically, we suggest:

1. All organisations in the GLA family and all organisations funded by the GLA/ TfL, including London local authorities, should contractually require their direct suppliers and their contractors to join FORS (at least bronze level);
2. The Police and the CPS should take into account membership (or lack of it) in investigations and decisions on collisions.
3. We welcome the Construction Logistics and Cyclist Safety (CLOCS) standard, with close links with FORS.

Action 11: design improvements for lorries: quiet lorries and under-run protection

[ALD]

- We support quiet vehicle technology, but want to be consulted on the effectiveness of measures to reduce lorry movements at peak times (especially in the morning peak hour and for construction vehicles)
- Under run protections should be as low as for buses
- Lorry operators will be more willing to fit safe sideguards to new and existing lorries if the design (weight, aerodynamics, etc) reduces costs. We would like to see an approved set of designs which can be incorporated in the Safer Lorry Scheme by the end of 2016.

Action 14: national and EU-level lobbying for improved lorry safety

[ALD]

- Possession of a driver Certificate of Professional Competence, including on-bike training, should be a condition of lorry drivers' licences. The DfT should also lobby the EC to extend this across the EU, as many lorry drivers operate outside their home country.
- We support lobbying the EC on direct vision lorry designs, but we advocate direct action in the UK. We would like the GLA/TfL to begin to require contractors on their major projects, such as the Northern Line extension, to use low cab lorries. Vehicle manufacturers would thus be encouraged to develop designs for such lorries.

[CTC] As a point of detail, we suggest that the first bullet-point of action 14 should be part of 15, given that the Certificate of Professional Competence process relates primarily to the safety of the driver rather than the vehicle.

Actions 15-19: Improving driver standards and awareness of cycling

Action 15: Partnerships with the freight, fleet and construction logistics industries to improve driver safety standards

[ALD]

- See first comment on Action 14.
- Off-site Health and Safety requirements should be defined, including compulsory incident reporting (with video recording equipment), driving licence checks and the extensive on-site requirements translated into off-site requirements.

Action 16: Extending the principles of FORS (the Fleet Operator Recognition Scheme)

CTC supports the wider extension of FORS. We would also advocate lobbying national Government to extend FORS to the rest of the UK. The freight logistics working group of the Public Transport Executive Group (PTEG, representing other large city authorities in the UK) is developing a freight strategy and we understand they too are keen to propose this. It is in everyone's interests that the criteria assessing safe lorries and operators should be consistent from one area to another, not least for the freight industry themselves.

Action 17: Bus driver training

CTC welcomes this action, having noted the impressive monitoring results of bus driver training hitherto.

However we also note the concerns flagged up by Bus Driver X (<http://saferoxfordstreet.blogspot.co.uk/2014/02/bus-driver-x-guest-blog-no-1-theory-why.html?q=bus+driver+x>) and other postings on this blog by Bus Driver X, notably his guest

blog 3), namely that the pressures on bus drivers are counter-productive to bus driver safety. If that is the case, then bus driver training may merely be serving to counteract a disbenefit, rather than actually providing a net benefit. We therefore urge that the effectiveness of bus driver training continues to be transparently monitored.

Action 18: Raise bus driver/operator awareness of high cyclist risk locations

- High risk mapping should be extended to lorries in addition to locations on the bus network. It should be made publicly available and include risks to pedestrians from lorries.

Action 19: Pressing DfT to strengthen the Highway Code's advice on cycle safety

CTC strongly supports this and remains keen to contribute to this process.

Actions 20-22: Enforcement and the criminal justice system

Action 20: Strengthen enforcement of driver and vehicle safety laws

CTC unequivocally supports the first bullet-point under this action, and is in principle supportive of the others. Any enforcement operations, such as Operation Safeway, should be evidence based and should target the root causes of danger to cyclists. The evidence used to inform the enforcement action and safety advice given by Operation Safeway officers should be made public.

However we have some comments on the remaining bullet-points.

In relation to the second, CTC is concerned at suggestions that there are a limited number of places on training hub courses and that, for this reason, only officers on the Cycle Task Force are able to waiver first time offences on condition of attendance at a training hub event. If the police are to be encouraged to trial this scheme more widely, the training hub will need to be better resourced to cope with increased demand.

Courses offered to cyclists in place of FPNs should correspond to the type of offence committed. It would not be appropriate to send a cyclist who receives a FPN for cycling on the pavement to an Exchanging Places event (this may actually have the opposite effect of making them even more fearful of cycling on the roads, potentially leading them to cycle more often on the pavement). It would be more appropriate to send them on an on-road cycle training course.

In relation to bullet-point 3, we welcome the aim of targeting enforcement by the Cycle Task Force etc at locations where cyclists face high levels of risk. In practice we are concerned that Operation Safety appears to be targeted at least partly at locations where cyclists are using pavements either to avoid danger rather than causing it, or where they are committing utterly trivial offences⁷

CTC also urges TfL to work with the MPS and College of Policing to ensure that police officers and PCSOs carrying out enforcement as part of Operation Safeway receive adequate and appropriate training about the dangers cyclists face before embarking on enforcement. Cycling organisations should be consulted on the training officers receive.

⁷ For instance see <http://www.ctc.org.uk/news/put-end-zealous-fining-london>. We have also received reports of enforcement activity near Aldgate (where cyclist Phillipine De Gerin-Ricard was killed last year) against cyclists who are clearly using pavements in ways that are intended to avoid danger, without in any way causing it.

Specifically they should be trained to exercise discretion in dealing with pavement cycling where it is (or appears to be) motivated by a desire to avoid danger, and where the cyclist is taking care to avoid causing danger, intimidation or inconvenience to others.

In relation to the 4th bullet-point, the use of NDORS courses needs some caution. These should not be used where the driver has driven in a sufficiently irresponsible manner as to warrant prosecution, or has caused injury serious enough for the victim to want to see justice done in court. Moreover, checks should be made to ensure that repeat offenders cannot repeatedly take NDORS courses to avoid prosecutions on multiple occasions.

Action 21: Double the number of 'Exchanging Places' events

[ALD] The aim should be quantified by reference to numbers of cyclists and pedestrians as well as numbers of events. An aim of 100,000 per year would be appropriate, given the potential levels of cycling in London and the needs of pedestrians.

Action 22: Work with the Police and Courts in London to improve transparency and standards

CTC welcomes the progress made to date on publishing reviews of the performance of the Met and CPS in London in handling cases where cyclists have been killed. This is a valuable step towards greater clarity. We would also welcome regular data on the legal outcomes of collisions where cyclists are injured or killed (and whether these are different from those of other road users), e.g. what proportion of these drivers are prosecuted and convicted (and for what offences), what sentences they receive, and the reasons why prosecutions are dropped in other cases.

There is also a need to improve communication with road crash victims, so they have a clear understanding of the justice process and reasons for outcomes. The Mayor, in his capacity as the Police and Crime Commissioner for London, is responsible for commissioning support services for road crash victims. CTC therefore urges the inclusion of a commitment to ensure road crash victims are given the support and information they need. We would also urge the Mayor to support calls to Government for all road crash victims to be included in the Code of Practice for Victims and for all victims of law breaking drivers to be counted as victims of crime. At present, injured and bereaved road crash victims are excluded from the services currently provided to victims of other forms of homicide or violent crime. There is no good reason for this, and the lack of support in understanding the legal processes ensuing from a road crash (particularly a fatal one) merely exacerbates the resulting suffering of seriously injured or bereaved victims. Too often, there failures to even notify the victims of key court dates. They also need to be able to challenge charging and decisions which they believe are wrong, and to be offered information on how to do this.

Finally, we urge TfL to work with the Coroners' Society to promote training for coroners on the handling of road traffic cases, and specifically those involving cyclists. Whilst some coroners are clearly sincere in wishing to fully understand and address the causes of cyclists' deaths, others handle cycling with an all-too-evident lack of knowledge or interest, making remarks which are either not evidence-based or which show a failure to understand issues of cyclists' road positioning etc.

Actions 23-27: Greater communication, skills and training for cyclists

Action 23: Launch of a 'virtual skills hub' where people can book cycle training, advanced skills and cycle maintenance courses

Action 24: Double the number of adults receiving advanced safety skills training by 2020, ensuring that 25% of adults who undertake cycle training achieve Bikeability level 3.

Action 25: Increase the numbers of children and young people receiving cycle training, aiming to ensure that, by 2020, 75% of training undertaken by primary school pupils is to a minimum of Bikeability level 2, and 75% of training undertaken by secondary school aged pupils is to Bikeability level 3.

Action 27: Work with the London boroughs to increase the uptake and effectiveness of Bikeability cycle training.

CTC strongly supports the aim to increase the availability, uptake and effectiveness of Bikeability cycle training, for younger children, teenagers and adults alike.

Whilst we welcome the commitments to boost the proportions of primary school aged pupils achieving level 2 of Bikeability cycle training, and of adults and secondary school aged children reaching level 3 of Bikeability, we do not have baseline data for the proposed targets, hence we are in no position to judge the degree of ambition they represent.

In any case, we would prefer to see targets set in terms of absolute numbers of people reaching these levels.

Action 26: Awareness and behaviour-change campaigns for both drivers and cyclists to improve cyclists' safety.

CTC supports the actions under this heading. However it is important that such campaigns are well targeted. It is politically tempting for authorities to run campaigns addressed to drivers and cyclists alike, in order to present themselves as “even handed”. This even-handedness is fine if the campaign is purely focussed on promoting positive behaviours and attitudes. However such campaigns become seriously problematic where they seek to address negative behaviours and attitudes. For one thing, this approach tends to reinforce the incorrect perception that responsibility for road danger, and for avoiding it, is evenly shared between drivers and cyclists, when this is simply not the case⁸. For another, the messages inevitably end up being poorly targeted.

If campaigns seek to tackle problem behaviours, they need to be targeted at the groups most likely to display those behaviours, and to be based on an understanding of why those behaviours occur. Lumping several problem behaviours into a single campaign – so that the campaign can be presented as “even handed” - inevitably means it will not achieve the requisite targeting. On the contrary, such campaigns merely aggravate perceptions that road users are being ‘tarred with the same brush’ as others who simply use the same mode of transport as themselves.

Rather than by castigating the behaviour of cyclists in ways which are designed to impress drivers (in the interests of “even handedness”), a more effective way to tackle problem behaviours among cyclists is by tapping into the desire of most cyclists to improve the levels of competence and responsibility among their peers. A particularly effective strategy may be to enlist the support of cycle trainers, particularly in tackling unsafe or irresponsible behaviour among teenage cyclists. For more, see CTC’s briefing on driver awareness campaigns.⁹

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⁸ See reference 4.

⁹ Downloadable from www.ctc.org.uk/campaigning/views-and-briefings/cycle-awareness-campaigns-for-drivers.