

THE GOVERNMENT'S DRAFT CYCLING AND WALKING INVESTMENT STRATEGY (CWIS) Summary of the response from Cycling UK

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).

We also welcome the recognition that *“realising our ambition will take sustained investment in cycling and walking infrastructure”* (paragraph 2.5). We are therefore dismayed that central Government investment in cycling in England (excluding London) is apparently set to fall from £2.07 per person annually in 2016/17 to just 72p in 2020/21.

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.
- *Energy consumption and climate change*: The Government is forecasting road traffic growth of between 19% and 55% by 2040². Even with vehicle efficiency improvements, it is hard to see how this demand can be met at the same time as meeting the target set by 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 Act's target), without adding substantially to the pressures for low-carbon energy in the UK³.
- *Obesity and physical inactivity*: In 2012, 33% of men and 45% of women failed to meet the recommended levels of physical activity. The World Health Organisation has predicted that 33% of women and 36% of men will be obese by 2030. Inactivity and sedentary behaviour are also associated with breast and colon cancers, type 2 diabetes and cardiovascular diseases⁴.
- *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 increases⁵.

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

² See www.gov.uk/government/publications/road-traffic-forecasts-2015.

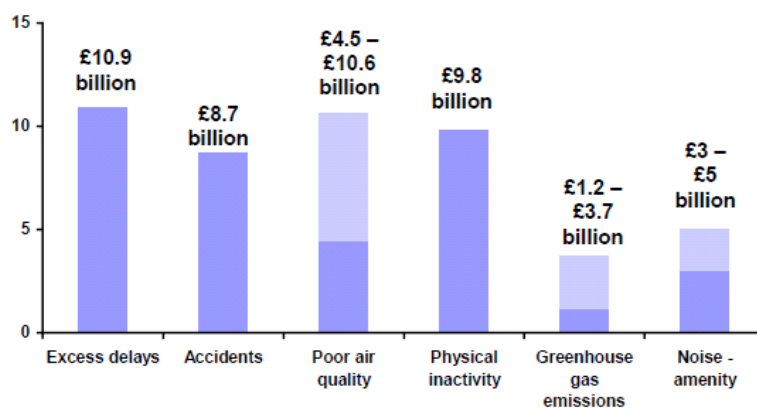
³ For further details, see Cycling UK's briefing on climate change www.cyclinguk.org/campaigning/views-and-briefings/climate-change.

⁴ For sources and further details see Cycling UK's health briefing www.cyclinguk.org/campaigning/views-and-briefings/health-and-cycling.

⁵ Department for Transport, *Reported Road Casualties Great Britain*, table RAS30013 (www.gov.uk/government/uploads/system/uploads/attachment_data/file/10158/ras30013.xls).

- *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)



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.

Our overarching concerns about the overall draft strategy are that:

- Its proposed target for increased cycle use implies a rate of growth which, if continued, would take us Dutch levels of cycle use shortly before the start of the 23rd century. More ambitious targets are needed if the CWIS is to set us on course for cycling, and indeed walking, to become the normal options for short journeys by 2040.
- The central government funding identified the draft CWIS appears wholly insufficient to meet even the inadequate target currently proposed.
- The lack of design standards means that a significant proportion of the available funding risks being 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 when carrying out 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 substantially reallocate funds from the Roads Investment Strategy (RIS) to the Cycling and Walking Investment Strategy (CWIS), to maximise the contribution of walking and cycling towards tackling congestion, road danger, physical inactivity and ill-health, pollution and climate change, rather than exacerbating these challenges.

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.

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.
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.

We believe the following aspects of the strategy need to be strengthened or added:

- *Level of investment:* this needs to be consistent with the strategy’s stated aims. The Government should either provide evidence that it can meet its stated aims with the level of investment proposed, or review the latter.
- *Design guidance:* We urge the Government to establish national cycle-friendly design standards, based on those already developed by Transport for London, the Welsh Government and/or the forthcoming guidance from Highways England. These should help ensure that opportunities to improve cycling conditions are identified at an early stage in planning not only road and traffic schemes, but also new developments and planned highway maintenance work. We believe this design guidance is needed for the strategy to comply with the Government’s Public Sector Equality Duty – and to enable local authorities to fulfil their PSED – by ensuring that cycle-friendly design meets the needs of younger and older people, as well as people with disabilities. This guidance should be written with sufficient clarity that it can be used to prevent poor or downright dangerous designs, as well as promoting best practice.
- *Traffic regulation:* Though Cycling UK welcomes the recent changes made to the Traffic Signs Regulations and General Directions (TSRGD), other changes are needed:
 - To give priority to cyclists and pedestrians going straight ahead over other vehicles turning across their path, at both signalised and unsignalised junctions;
 - To permit the introduction of ‘simultaneous green’ signalised junction designs⁶; and

⁶ 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).

- To simplify the introduction of 'shared use' facilities (e.g. in parks and open spaces) by clarifying that cyclists should have primary responsibility for avoiding pedestrian conflict.
- *Local Cycling and Walking Infrastructure Plans:* The guidance to local authorities on preparing LCWIPs needs to provide advice on identifying comprehensive cycle networks for their area, supported by tools such as the Propensity to Cycle Tool (<http://pct.bike>), on implementing these to standards which comply with their Public Sector Equality Duties, and on securing input and support from local cycle users and cycling groups. See also our response to question 5.
- *Role of the planning system:* the CWIS needs to spell out how it will achieve its stated aim of ensuring that new housing developments (large and small alike) are designed in accordance with the Manual for Streets and similar guidelines.
- *Local support:* Local authorities, Local Enterprise Partnerships (LEPs) and Combined Authorities all need greater support in developing LCWIPs and individual cycling schemes.
- *Road traffic law and enforcement:* the Home Office and Ministry of Justice respectively need to lead on strengthening up roads policing, and on conducting a long-awaited review of road traffic offences and penalties. The latter should aim to ensure that driving which has caused obviously foreseeable 'danger' is no longer dismissed as merely 'careless' driving, while making greater use of driving bans for offenders who do not appear to need a custodial sentence for public protection.
- *Highway Code review:* the Highway Code is long overdue for an update, partly to reflect recent changes to traffic regulation and signing, but also to bring in the following changes:
 - Make it clear that the users of the heaviest and fastest vehicles have a greater responsibility for the safety of more vulnerable road users
 - Introduce rules on the space which drivers should leave when overtaking cyclists (including the need to allow extra space in adverse weather, or when driving lorries and other larger vehicles)
 - Remove prejudicial wording on the supposed need for high visibility clothing and helmets. Regardless of the debates about their supposed effectiveness, the rules on hi-viz and helmets should not be used by insurers to harass seriously injured crash victims or their bereaved relatives, causing them years of distress and costs defending unjustified 'contributory negligence' claims.
 - Boosting cyclists' and pedestrians' priority at both signalised and unsignalised junctions.
- *Lower speed limits:* 20mph limits should now become the norm for built-up streets, with highway authorities being free to adopt other limits as they see fit.
- *Lorry safety:* The Government should take action to minimise lorry use particularly at the busiest times and places, e.g. by maximising rail and waterborne transport. It should also adopt Transport for London's 'Fleet Operator Recognition Scheme (FORS) and the Construction Logistics and Cycle Safety (CLoCS) standards, while seeking to normalise the use of 'direct vision' lorries (i.e. those whose cabs give the driver as good a view of their surroundings as a bus driver has), e.g. by specifying their use for future work for Highways England and the HS2 Ltd (both Government-owned companies). DfT should also follow TfL's lead in setting up the London Freight Enforcement Partnership, bringing together the police, Health & Safety Executive and Transport Commissioners to tackle unsafe lorry operators – a similar model should be adopted elsewhere.
- *Driverless cars:* With legislation on driverless cars promised in the recent Queen's Speech, the Government needs to spell out how it will ensure that this development supports shared (rather than private) car ownership and hence reduced car use, while freeing up 'space for cycling' – and to avoid the risks that the opposite happens.
- *E-bikes:* The growth in e-bike usage elsewhere in Europe is boosting cycle use among older and less physically able people, while increasing the length of journeys for which people are willing to cycle. Cycling UK calls for the reallocation of some funding from electric cars to help stimulate the UK's e-bike market.
- *Cycle / public transport integration:* public transport operators should collaborate with public authorities to provide: safe and convenient access to public transport stations etc; cycle parking, hire and storage facilities; facilities for carrying cycles on public transport

services, governed as needed by reasonable rules and reservation systems; and good information about cycle carriage.

- *Rights of Way law*: Cycling UK calls for an overhaul of English Rights of Way law, along the lines of the Scottish Access Code or the similar legislation now being considered in Wales.
- *Positive promotion and cycle training, for people of all ages and demographic groups*: Whilst 'smarter choices' measures are no substitute for quality infrastructure, they are a very cost-effective complement to it, helping to encourage of cycling among groups who are generally under-represented in cycling, e.g. women, children, older people, people with disabilities.
- *Monitoring, oversight and evaluation*: The Expert Committee proposed in the strategy needs adequate resources, both to provide it with the information needed to scrutinise and comment on cycle policy locally around England, and to give it some negotiating power in its dealings with local authorities, LEPs, Combined Authorities etc.

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.

In our full response, we identify the roles which we believe need to be played by the following Government departments and other bodies:

- The Department for Transport and its agencies;
- The Department for Communities and Local Government and the planning system;
- The Department of Health and the health sector;
- The Department for Education and the education sector;
- The Department for the Environment, Food and Rural Affairs (including rights of way and countryside access, as well as issues like air quality);
- The Department of Culture, Media and Sport, together with Sport England, in promoting cycling as active travel, recreation and tourism as well as 'competitive' cycling;
- The Home Office, Ministry of Justice and other bodies in the justice system (police, prosecutors, the courts and other safety regulators such as the Traffic Commissioners)
- Local authorities, Local Enterprise Partnerships (LEPs) and Combined Authorities;
- Public transport operators;
- The voluntary and community sector.

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

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 full consultation response to question 1 references 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).

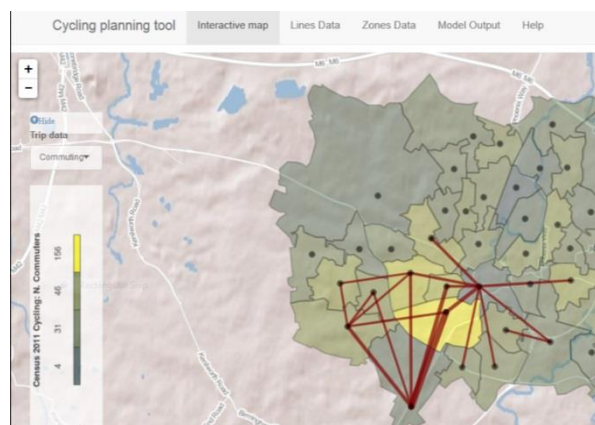
Our full response highlights the value of targeted ‘smarter choices’ measures at groups who are under-represented in cycling. Cycling has the potential to open up educational and/or employment opportunities which might be otherwise hard to access, thereby increasing their chances of fulfilling their 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 briefing⁷, as well as on the webpages for our Community Cycle Clubs and Big Bike revival webpages⁸.

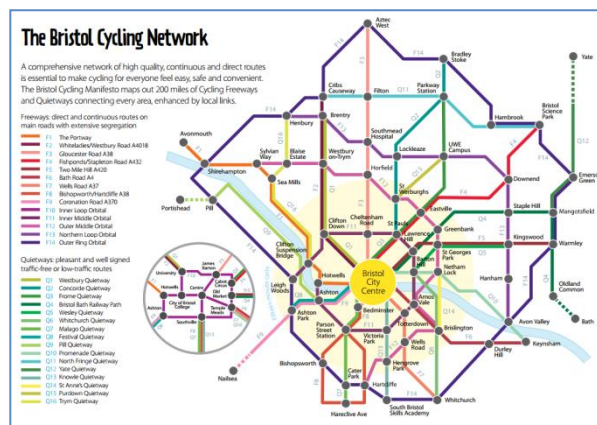
Question 5: The Government would be interested to hear views on what type of assistance Local Authorities and Local Enterprise Partnerships would find beneficial to support development of ambitious and high standard Local Cycling and Walking Infrastructure Plans.

Our full response highlights 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 to identify 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.

⁷ Downloadable from www.cyclinguk.org/campaigning/views-and-briefings/smarter-choices.

⁸ See www.cyclinguk.org/project/community-cycle-clubs and www.cyclinguk.org/project/big-bike-revival.