

# London Road Safety Action Plan consultation

## response from CTC

### Introduction

CTC, the national cycling charity, was founded in 1878. CTC has 70,000 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.

### Summary

CTC believes that there must be a much stronger emphasis in the document on road safety's wider role in contributing to public health. This is far greater than simply numbers of casualties – we suggest that the system of road safety which measures casualties and fails to acknowledge the public health benefits of active travel and reduced motor traffic may be having a counter-productive effect on public health.

We also suggest that the Action Plan needs to move away from its current, victim-centred approach, and instead focus much more on reducing danger at source, by tackling the types of behaviour, road users and street design that cause harm to others.

We also offer some suggestions for various concrete actions that are missing from the Action Plan, including a stronger focus on compliance, lorries, the need to commit to 20 mph on TfL's road network and a commitment to roll out Intelligent Speed Adaptation in public service fleets, such as bus fleets, and through contractors working on construction and maintenance.

Finally, we suggest that there is far too strong an emphasis on educational and marketing campaigns aimed at the victims of road traffic crashes. We suggest that education be aimed principally at the source of road danger – the operators of motor vehicles.

### Framework for road safety

CTC is concerned that the framework in which the Action Plan sits ignores the wider issues of public health, notably the huge benefits to be accrued from a shift to active travel and a reduction in motorised transport. Evidence for the huge public health benefit – far outweighing the tiny changes to public health proposed from the Action Plan – must be taken into consideration when preparing a policy on road safety.

Whereas the Plan claims a reduction of 10,000 KSI over its course, other estimates of the public health damage from motor transport – and the health savings that could be achieved – are far greater.

For instance, research published in the Lancet suggests that the public health risk from road crashes is far lower than the public health benefits of increased cycling. If, by 2030, cycling levels increased eight fold, walking doubled and car use was cut by 40%, the increase in premature deaths per million of the population from road traffic crashes (11 per year) would be offset by savings of 541 lives – per year – from increased physical activity and reduced air pollution.<sup>i</sup> This research reveals that just reducing car use – coupled with a substantial increase in active travel – will achieve huge public health benefits, far greater than any reduction in injuries due to reduced road crashes alone.

Most of those benefits accrue because of the huge benefits of shifting from passive to active transport. However, a few of the lives saved – and disability affected years of life reduced – derive from an improvement in air quality thanks to the reduction in motor traffic. Indeed, one estimate of the effects of air quality – most of which derive from motor traffic – found that 4,267 deaths in 2008 could be attributed to poor air quality.<sup>ii</sup>

It is clear from this evidence that the health benefits that come from minor changes to road safety are outweighed several times over by placing road safety actions within an overall strategy to remove internal combustion engine motor traffic from London. We advise that the Action Plan acknowledges this fact and explains how its actions will contribute to the public health need to reduce motor traffic and shift to active travel.

### **Targets and indicators – a better framework for road safety**

CTC is deeply concerned that retaining a target of overall casualty reduction will result in perverse incentives for Transport for London over the next few years.

Over time the proportion of serious and fatal casualties which occur to pedestrians and cyclists has risen substantially and is likely to increase over time. The combination of falling motor traffic volumes, speeds, improvements in vehicle safety technology improves and shifts to walking and cycling are likely to lead to vastly increased exposure to road danger for people on foot or by bicycle, as well as a fast reducing risk for those inside vehicles. Already cycle fatalities have risen from 6% of the total in 1994-98 to 10% of the total in 2011, while cycle KSIs have increased from 8% of the total to 20% over the same period.<sup>iii</sup>

Even the Mayor's modest ambition to increase cycling levels three fold over the next 24 years will mean a substantial increase in cycle casualties, even if, as expected, the risk of cycling falls. This increase in cycle casualties, which is likely to occur at the same time as an overall decline in other road user casualties, will present a significant challenge to policy based on a single, blunt target figure for all casualty reduction.

Cycle casualties will appear to be a 'bad news' story, even if the background level of risk is declining and Transport for London will find itself criticised for failing its own performance targets. If TfL wish to maintain policies both in favour of increasing cycle use, and improving safety, it needs to be able to measure the latter in a more sophisticated manner than simply counting the numbers of injuries.

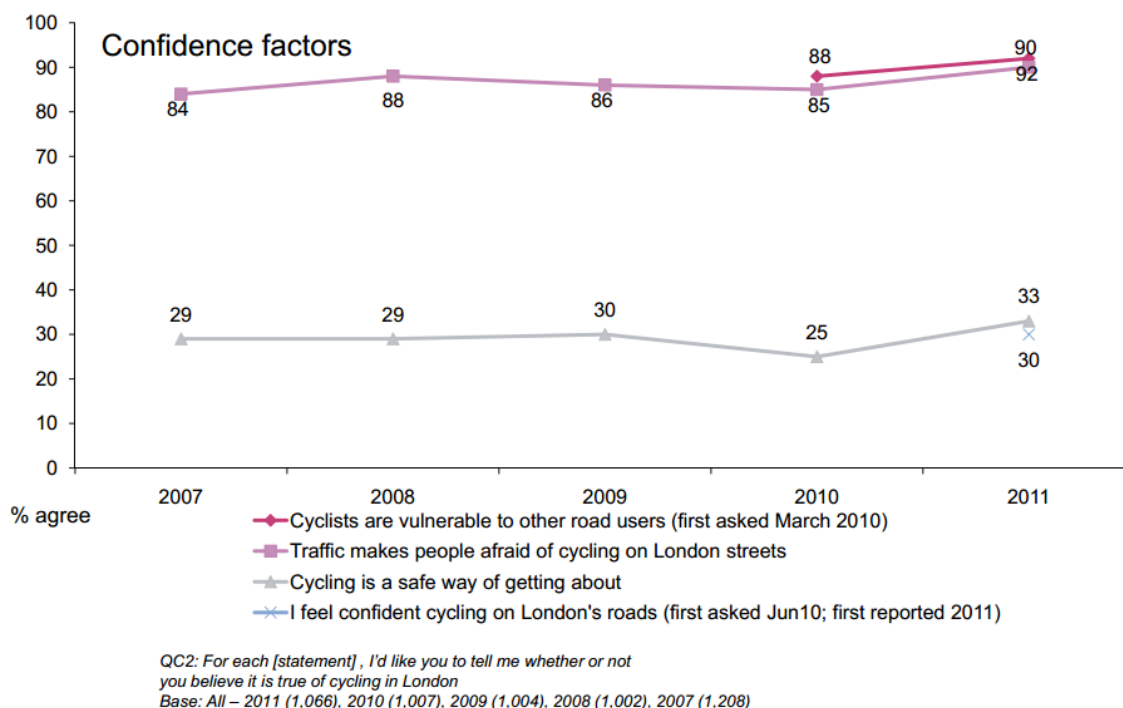
CTC's position has, for a long time, been to advocate the use of rate-based targets. On a national level this was agreed in the previous Government's draft road safety strategy, and partly adopted in the present Government's *Strategic Framework for Road Safety*.<sup>iv</sup> CTC is content with the national situation whereby there are no targets, merely indicators, since any single target would necessarily conflict with – and take precedence over – any indicators. We suggest that TfL's approach – whereby a single target will be backed up with potentially conflicting indicators – will not help communicate the effectiveness of TfL's efforts to increase cycle use while improving the safety for cyclists.

In a recent meeting of the Cycle Safety Working Group cycling stakeholder groups proposed that TfL include rate-based targets rather than merely indicators. TfL assured the meeting that it is possible to increase cycle usage three fold yet still reduce overall cycle casualties. If it were possible to achieve this, CTC would obviously welcome it, but to secure a 40% reduction in the number of casualties and increase cycle use by 300% there would need to be around an 80% improvement in the *risk* of cycling. This seems highly improbable given the fact that over the last few years the risk of cycling has been increasing, not decreasing.

### **Perception-based indicators**

At a local, borough-level, rate based targets are harder to establish, due to the difficulties with accurately measuring both cycle use and cycle casualties. The combination of variation in reporting rates and cycle use measuring techniques, together with natural variation in casualties, make any year on year change at a local level too variable to base policy changes on.

In lieu of accurate local data on cycle use, CTC believes a better way to measure safety for cyclists (and pedestrians) is to assess the perception of safety. This is, after all, the major barrier to increasing cycle use – the most recent regular survey of attitudes to cycling found that by far and away the biggest reason for not cycling were concerns over safety (41% - unchanged in 2011 from 2010). Across London, indicators appear to present a mixed picture, but in general the proportion who view cyclists as a vulnerable user group and agree that the volume of traffic makes people unwilling to cycling far outweigh those who view cycling as a 'safe' mode of transport. See below for the relevant graph from *Attitudes to Cycling*.<sup>v</sup>



We suggest that not only is the attitudinal surveying maintained, but the sample size is strengthened so that data can be obtained for local levels.

We recommend that both risk-based targets and perception-based indicators are presented through the proposed Annual Report.

### Compliance

CTC believes that there needs to be a much stronger emphasis on enforcement of road traffic law. The Action Plan needs to explain how the huge cuts to the Metropolitan and City of London Police budgets will affect road safety and the commitments made in the Mayor's Transport Strategy and the Action Plan.

We note that over the last ten years traffic policing levels in the Metropolitan Police have fallen 43%, from 583 uniformed officers in 2002 to just 331 in 2012.<sup>vi</sup> Without sufficient officer numbers, enhanced compliance is unlikely to succeed. Similarly the lukewarm commitment to camera enforcement (merely agreeing to move to digital film and maintain the existing network – G4) is extremely weak. On average speed cameras for 20 mph areas, TfL's plan to "explore the potential of joint working" (G2) with Boroughs reveals a total lack of ambition or interest in this vital and innovative approach to enhancing enforcement of lower speed limits.

The claim that the cycle taskforce should have a leading role in "crack[ing] down on illegal and antisocial road user behaviour" is deeply worrying. The taskforce may be useful and staffed by excellent officers, but at the strength of just a dozen or so officers it is almost irrelevant when compared to the scale of antisocial and illegal

road user behaviour which is the experience of all who use London's road network on a daily basis.

## **The road environment**

Linked to the need for rate-based casualty data, CTC advise that when identifying “high risk’ locations” (F1) to target improvement the focus must be on sites where the risk per vulnerable user or trip is greatest, not simply on the locations where numbers of injuries are greatest. It should be obvious that there will be many locations where cycle use is suppressed because of the very poor perceived safety of the current layout. An assessment based merely on numbers of casualties will utterly miss the need to tackle these strategic, if currently under-used, locations.

We welcome the (long-standing) commitment to revise and improve the London Cycle Design Standards (B3) but note that even when revised, these standards may well conflict with other aspects of TfL's internal guidance, such as TfL's Road Safety Audit system (F4), which is woefully inadequate and has led to the design of extremely hazardous cycling facilities.<sup>vii</sup>

TfL should plan for widespread implementation of 20 mph speed limits on much of the TLRN, particularly in locations where pedestrian and cycle use is high, or where pedestrian and cycle use is suppressed by high speeds. In locations where measures cannot be taken to reduce volumes or speeds sufficiently, CTC supports the provision of innovative, high quality cycle facilities and urges TfL to pursue a much more ambitious programme of improvement to junctions and major links to ensure that all of the major road network is made fit for cycling.

## **Lorries**

Given that half of all deaths of cyclists involve lorries, CTC believes that TfL needs to go much further than the limited, but important, steps proposed in the Action Plan (I1-I5, N2, N8, N9). Lobbying to improve vehicle design is fine, but side-steps any direct responsibility TfL could be taking to reduce the problem at source: the presence of many heavy vehicles on streets shared with cyclists and pedestrians.

Over the course of the Action Plan, TfL should be looking to see how the levels of heavy goods vehicle traffic can be contained, reduced, or shifted in ways to reduce conflict with cycles. One major step would be to discuss with the Boroughs changes to the Lorry Control Scheme and major contractors and hauliers to explore ways to reduce heavy goods traffic during commuting times.

## **Innovation**

TfL should be doing much more to pursue the one truly innovative piece of technology that could improve road safety: Intelligent Speed Adaptation. Results from trials of this technology (both in London and nationally<sup>viii</sup>) show that this is an acceptable and effective way of improving compliance with speed limits. Currently N3 states that TfL commits to “rolling out the new digital speed limit map for London”

so that ISA can “operate effectively in London”. This makes a change from the current state of affairs, in which the digital speed limit map has been unobtainable.

However, TfL should be committing to go much further and implement ISA in its own fleets, encourage boroughs to similarly follow, and use its contracting power (as it has done on cycle safety through Crossrail) to roll out ISA in as many vehicles as possible. This is a major opportunity for TfL to take the lead in this highly innovative and potentially hugely beneficial technological improvement.

## Education and victim focus

There is far too much emphasis on education and marketing, particularly aimed at pedestrians and cyclists (H1 – “target vulnerable road users...with campaigns and information to drive awareness of the main causes of collisions and providing advice on travelling safely”). Given that two thirds of crashes between motor vehicles and cyclists (where the victim is an adult) are blamed on motor vehicles, we think it is more appropriate to focus marketing on motorists.<sup>ix</sup>

The exception of course is Bikeability cycle training, which is used to provide both child and adult cyclists with the skills to communicate more effectively with other road users and give them the confidence to use the road network in its current state.

It is this emphasis on the victims of road crashes, rather than the source of danger, that remains the most problematic element of the draft Action Plan.

CTC

October 2012

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<sup>i</sup> Woodcock J et al, 2009. 'Public health benefits of strategies to reduce greenhouse-gas emissions: urban land transport.' *The Lancet*. Published online 25/11/2009

<sup>ii</sup> Miller BG, 2010. *Report on estimation of mortality impacts of particulate air pollution in London*.

<sup>iii</sup> TfL, 2006. *Casualties in Greater London during 2005*, TfL, 2012. *Casualties in Greater London during 2011*.

<sup>iv</sup> DfT, 2009. *A Safer Way*, DfT, 2011. *Strategic Framework for Road Safety*.

<sup>v</sup> TfL, 2011. *Attitudes towards cycling 2011*

<sup>vi</sup> Home Office, 2012. Response to Freedom of Information request from CTC. Data available at

<http://beta.ctc.org.uk/which-police-force-has-seen-biggest-drop-in-traffic-policing>

<sup>vii</sup> Morgan H, 2011. *A Review of London's Road Safety Audit Procedures and the cyclist: with reference to the Martin Way (B286) file* (<http://www.mertoncyclists.talktalk.net/Unsafe.pdf>)

<sup>viii</sup> Lai F and Carsten O, 2012. 'What benefit does Intelligent Speed Adaptation deliver: A close examination of its effect on vehicle speeds' *Accident Analysis & Prevention*. Vol. 48, September 2012, pp 4–9

<sup>ix</sup> Data from TRL report PPR445 – full data set acquired through direct communication with DfT, accessible from here: <http://beta.ctc.org.uk/blog/chris-peck/whos-to-blame-in-crashes-between-cyclists-and-motorists>