

## Response to the consultation on TSRGD 2015 from CTC, the national cycling charity

### Current proposals in the draft TSRGD

The draft TSRGD 2015 out for consultation includes several key changes which will be of benefit to those who use bikes currently and to local authorities seeking to encourage more people to cycle, however, CTC believes it should go further in giving greater flexibility to local authorities, whilst also giving practical examples of ways to use that flexibility.

The consultation response form is structured principally to accept responses from highway authorities or other users of the Regulations. CTC has therefore responded with a focus on the parts of the changes we welcome, and the further changes we wish to see.

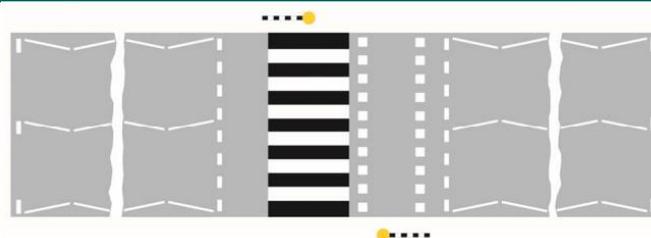
The main changes, which CTC greatly welcome, are as follows:

- 1. Removal of requirement for traffic orders when making exemptions for cyclists** - when banning traffic movements (ie, one-way streets, no right turn) cyclists will be exempted without requiring a specific traffic order. This will greatly help to reduce the bureaucracy and costs of making simple changes which enhance permeability for cycling.

The measure will make the existing prescription of 'no entry' with an 'except cycles' plate even easier and cheaper to implement. In many cases one-ways or turning movement restrictions are imposed to reduce local traffic

- 
- 2. Altering regulations and markings to permit pedestrian and cycle segregated zebra crossing** - until now cyclists have not been allowed to use zebra crossings, but, if implemented, the changes will mean cycle routes can be placed next to zebra crossings markings with drivers obliged to give way to cyclists when crossing. Priority crossings are absolutely vital to ensure any off-carriageway cycle tracks are safe and continuous. The anachronistic Belisha beacons and zig-zag lines will remain, however, which adds unnecessary street clutter (see below).

Figure 5.1 proposed concept layout for a shared-use pedestrian/cyclist crossing



- 
3. **Cycle streets** - these are widely used in the Netherlands (see right, "cars are guests") and Germany to give priority to cyclists over motor traffic on minor streets which also act as major cycling corridors.



The Department proposes allowing trials of this as "a bold initiative, which is being considered by some of the Cycle Cities and London, possibly including a ban on overtaking on lightly trafficked roads where cycle flows are high." However, in the Netherlands, cycle streets are only used where cyclists outnumber motorists by two to one, and where motor traffic flows do not exceed 2,000 PCUs per day. Those conditions rarely exist in Britain, so we expect that, while sensible, this approach will have only limited application even in places with comparatively high cycling levels, unless through motor traffic can be excluded from the route.

In addition, the no-overtaking rule should be enforced primarily through the layout of the street to encourage compliance – in particular the layout of a surface texture that encourages a prominent positioning by cyclists, and clearly indicates to drivers.

- 
4. **Pedestrian and cycle zones** - instead of marking zones as 'no motor vehicles', town centres which permit cycling would be signed as such. This is a small change, but will make a difference to attitudes and make it clearer that cycling is permitted in these areas.
- 
5. **Low level signal heads prescribed** – already under trial, cycle-specific signal heads and low level signals may help reduce signal clutter, improve clarity to all road users and could allow early start for cycles, potentially reducing conflict at junctions where there is a conflict between predominantly left-turning motor traffic and straight-ahead cycle traffic.
- 
6. **Floating zig-zag markings** – permitting zig-zag markings to be placed outside a cycle lane will greatly improve continuity of cycle lanes. These markings are also uncomfortable for cyclists to cross, particularly if the markings have been refreshed using thermoplastic several times since the last time the road was resurfaced without older markings having been removed.
- 

## Further changes to TSRGD required

Other measures or changes to the proposals that CTC would like to see adopted in TSRGD 2015 are set out below. In the main, our principal concern is with the system of crossings in the UK are highly restrictive, and needs much greater relaxation.

### Re-examine innovations without regard to regulatory changes

CTC believes that the Department should be far more open to innovative approaches to marking, signalling and signing as used by other European countries, many of which have a far more functional cycle network than ours.

A TRL study into Traffic Management Techniques for Cyclists (CPR1035) examined a range of 48 techniques for improving safety and movement for cyclists at junctions, many of which have never been tried in the UK. Its conclusions are useful, and have clearly fed into preparing these revisions. However, many of the techniques received negative scores because of the cost and bureaucracy associated with the regulatory changes required.

Each technique was scored against a range of 48 criteria from a range of -2 to +2. While 14 of the criteria related to cyclists, another 16 referred to other road users, including pedestrians. The remainder concerned costs, regulation and legislation and assorted other aspects. Final totals for the 48 techniques ranged from 47 to -10, of which ten techniques were declared as negative overall.

CTC believes that the results of this exercise should be re-examined with the scores for regulation removed, since these (plus the criteria 'In use' and 'Cost of trials') penalise innovation, and should be discarded if we are considering how TSRGD could be changed to enhance conditions for cyclists.

Some techniques examined by TRL which CTC should be included for trials by the Department are:

**Simultaneous green phases for cyclists (aka 'scramble crossing')** – this technique, widely used in the Netherlands, would allow cyclists to pass through a junction in any direction while all traffic was held. It could run in parallel with a pedestrian 'scramble' phase already widely used, with cyclists expected to give way to pedestrians. Simultaneous green phases were examined by TRL in three different forms, which scored well to moderately well for cyclists (the best ranked 8 out of 48 techniques), but since this is not used in Britain (other than for pedestrians) it scored very badly, with maximum negative points (-8) for regulation and legislation and further lost points for trials and not being 'in use'. All told, this meant that techniques which were rated positively for cycling ended up as negative or with overall ratings of 0 at the end of the multi-criteria analysis.

**Left turn cyclists during red phase** – again, this technique is widely used in the Netherlands and other countries to allow cyclists greater freedom of movement, and reducing some conflicts with motor traffic. TRL examined 3 different ways of allowing cyclists, and the result was highly negative scores, especially for regulation and legislation. Despite this, versions of traffic signal bypasses already exist in the UK and a version of left-turn on red (using a pavement slip lane) has been planned in several locations.

### **Improving the pedestrian/cycle crossings**

In addition to a segregated crossing, CTC agrees with Transport for London that in some cases a shared use zebra crossing should be permitted, with their use merely designated by the introduction of cycling routes on shared-use footways on either side of the road (rather than requiring additional signage).

Currently Toucan signalled crossings are by default shared-use, so we do not understand why there would be a reluctance to permit shared-use on zebras. Existing experience in London, where shared-

zebras have been monitored by Transport for London, suggests that this does not pose a significant problem and could be something to be determined on the basis of local circumstances and proportion of flow by pedestrians/cycles.

Fully shared zebras would also be more sensible where the routes on the approach are unsegregated – for example, in a wide, vehicle restricted area, or where the cycle route approaches one side of the crossing, but there is only room to continue it on the other side of the road on the far side of the crossing.

### **Regulations associated with the new crossing**

New regulations associated with the crossing will include the need to make drivers give way to cyclists, however, exactly when and how that priority will be ceded needs to be made completely clear, and accompanied by an advertised change in the law, together with a revision to the Highway Code.

In Britain, priority for pedestrians over motor traffic must be given as soon as a pedestrian puts their foot onto the crossing, a movement normally accompanied by making eye contact with the driver to secure priority (where the pedestrian is sighted).

In the Netherlands, design for cycling is most sophisticated and correspondingly cycle use is higher than anywhere else in the developed world. The design of crossing proposed here is similar to those used in the Netherlands, however, in that country cyclists (and pedestrians) have absolute priority over approaching traffic and do not have to negotiate priority. It was this design that was recently trialled at TRL, the results of which are still awaited.

We believe that the regulations must give local authorities the flexibility to include priority crossings for people on bikes which do not include the need for a negotiated priority. We understand that this represents a major change from present experience of zebras and will, as above, require changes to the Highway Code and advertising of the changes.

### **Road markings and signs associated with crossings**

CTC also believes that local authorities be given the flexibility to dispense with Belisha beacons and zig-zag markings where these are deemed unnecessary by local risk assessment. Where speeds are low, for instance, and pedestrian traffic very important, there seems to be no reason why illuminated signs and zig-zags must be retained, particularly if street lighting is good enough. The requirement for zig-zags means that there are only a few cases (such as the incorrectly applied crossing shown below in Westminster) where local authorities are bold enough – or seek authorisation from DfT for – a crossing which is placed across the mouth of a junction.

In the photo below zig-zags have only been applied beyond the Petty France crossing, despite this being a one-way street in the other direction. The only purpose these zig-zags play is in restricting parking/waiting – but that could easily have been prevented by running the double yellow lines to the edge of the junction, thereby reducing marking clutter. No zig-zags have been applied on the entry side of the junction, and road users must travel over the zig-zags for the Buckingham Gate

crossing to reach the Petty France crossing. This is a messy, yet still non-prescribed – approach to road marking that will have to continue under the new regime.



### **Elephants' print markings on all crossings**

Although we welcome the decision to prescribe elephants' print markings, we believe that restricting their use only to designate cycle crossings on signalled or zebra crossings undermines the potential utility they may have to simply mark priority crossings of side roads, or to maintain priority for hybrid cycle lanes across the mouths of side roads.

Currently give ways are usually designated with a cumbersome collection of road markings, including standard double-dashed give-way markings (diagram 1003A) together with triangular road marking (diagram 1023A), as well as associated centre-line and side of carriageway markings. The combination of these markings – not all of which are always necessary – restrict the distance between which two give-ways can be provided.

Without a simpler means of marking give-way it will remain very difficult to provide priority for cycle tracks over side-roads, particularly if designers follow Dutch practice of aiming to bend the cycle track in towards the junction to improve visibility. This typically aims for just 0.5-2m of space between cycle track and the main road where the speed limit is ~40 mph or lower.

We believe that the elephants' print marking could be a useful way of designating priority for cyclists over side road traffic and should be disconnected from any other road marking.

### **Britain's poor pedestrian crossing record**

We do not understand why the Department for Transport is keen to be flexible in some areas – such as illumination, traffic orders and so on, but remain rigid in others.

In conversation with officials from the Department, it was suggested that the UK has extremely safe design of pedestrian crossings and the Department is unwilling to make changes that may undermine this. However, evidence collected by the Eurotest programme found that Britain has one of the worst record of 10 European countries studied for pedestrians killed (per million of the population). While it is true that Britain's record for pedestrian crossings is one of the best in the ten countries examined (beaten only by the Netherlands), the rate of deaths not on pedestrian crossings is extremely high – second worst.<sup>i</sup>

We suggest that the reason for this are either that:

- a) pedestrians are refusing to use crossings despite them being adequate and well located,
- or
- b) crossings are neither numerous enough, nor in the right place to meet pedestrian demand.

We see no reason why a) should be any more common in Britain than in any other country, yet the position seems to be worse. This suggests that b) is more likely.

Britain's appalling safety record for pedestrians is likely due to the lack of pedestrian crossings, or the positioning of pedestrian crossings deliberately away from the desire line, to accommodate the suggestions in LTN 1/95 The Design of Pedestrian Crossings only to establish signalled crossings 20 metres from a junction. Pedestrian crossings located away from desire lines (as all staggered crossings necessarily are)

This is important when it comes to priority cycle crossings, because maintaining a desire line is even more important for people on bikes, who are less manoeuvrable than pedestrians, and require more relaxed geometry.

While most of the changes to accomplish better crossings are controlled by guidance, rather than regulation, many of the aspects of crossing markings should be relaxed in order to accommodate a greater flexibility, particularly in places where speeds and volumes are low, or where crossing pedestrian (or cycle) traffic is of greater importance than motor traffic.

CTC, the national cycling charity  
June 2014

---

<sup>i</sup> Eurotest, *Pedestrian crossings survey in Europe*. January 2008. retrieved from [http://www.fiafoundation.org/Documents/Road%20Safety/eurotest\\_final\\_report\\_p\\_crossings\\_290108\\_v3.pdf](http://www.fiafoundation.org/Documents/Road%20Safety/eurotest_final_report_p_crossings_290108_v3.pdf)