

- 1. 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. www.ctc.org.uk
- 2. CTC promotes cycling and protects and inspires cyclists for many reasons, not least because it is one of the easiest ways of introducing an efficient, convenient and potent physical activity into people's daily lives.

Introduction

- 3. CTC welcomes the opportunity to contribute to the draft Cycling Delivery Plan (CDP) and sees its publication as a real chance for Government to demonstrate the same level of commitment to cycling that road and rail currently receive, particularly in terms of funding for cycling. As the recent DfT publication by Adrian Davis *Claiming the Health Dividend* reported, the return of investment on cycling is consistently higher than either road or rail.
- 4. Using the following five "litmus tests", CTC believes that in its current format the CDP could do with improvement:
 - i. leadership and ambition;
 - ii. sustained investment;
 - iii. consistent high design standards;
 - iv. safety measures; and
 - v. positive promotion.
- 5. In our response, CTC will address such considerations through the four themes outlined in the draft CDP, making reference to the particular paragraphs and actions of the Plan where appropriate e.g. (CDP X.X).

Theme 1: Vision, Leadership and Ambition

- 6. CTC believes that the CDP's ambition "to double cycling...from 0.8bn stages in 2013 to 1.6bn stages" (CDP 1.1) is seriously lacking in ambition and does not represent a true doubling. Taking into account population growth and the expected increase of cycle use in London (where the current Mayor has committed a £913m spend on cycling over the next 10 years), an increase to 1.6bn stages amounts to an increase of 74 per cent in cycling trips per person in England outside of London. If this rate of growth were continued, England would not achieve Dutch level of cycle use until just before the beginning of the 23rd century.
- CTC recommends that Government adopts the All Party Parliamentary Group (APPG) on Cycling's ambitions for growth as outlined in their *Get Britain Cycling* report. This report calls for a staged increase of cycling to 10 per cent of all trips (roughly German levels) by 2025, and 25 per cent of all trips (near Dutch levels) by 2050. Based on modelling by



Lovelace and Woodcock (see fig 1) of the trajectory for cycling to reach a target of 25 per cent of all journeys by 2050, CTC notes that a gradual increase to 10 per cent of all trips would be achievable in 14 years (2027), rather than 2025 which would require a sharper increase (see GBC line in fig 1).

8. We therefore suggest that Government makes a firm commitment to increasing cycle use to 25 per cent of all trips by 2050, and that appropriate interim milestones are established.

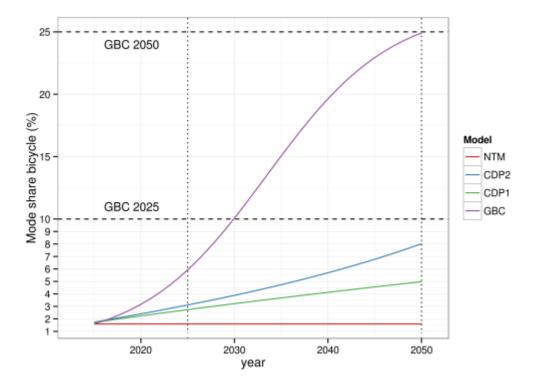


Figure 1: Lovelace & Woodcock - Modelling uptake of cycling and associated health savings¹

9. Progress in cycle growth should be reported at regular stages, which CTC suggests should happen annually. Furthermore, CTC believes the Active Travel Consortium would be well placed for this reporting, as well as to ensure that the plan is on track and that there will be a consistent commitment to actioning the ambition for cycle growth.

¹ Lovelace & Woodcock: *Modelling uptake of cycling and associated health benefits (Oct 2014)* <u>http://robinlovelace.net/publications/health-benefits-cycling-uptake.pdf</u> Key:

NTM = National Transport Model

CDP1 = Cycling Delivery Plan, assuming a doubling of cycle stages by 2025 and linear growth thereafter, with total trip-making by all modes remaining constant at current levels.

CDP2 = Cycling Delivery Plan, assuming a doubling of cycle stages by 2025 and linear growth thereafter, but with a continuation of the decline in overall trip-making by other modes (see National Transport Survey table NTS0103)

GBC = Get Britain Cycling, meeting the target to increase cycle use to 25% of trips by 2050.



- 10. For the Active Travel Consortium to be an efficient body and fulfil its role, CTC believes that it needs funding including a strong component of revenue funding. As well as meeting its own separate costs, this would also allow it to deliver projects with Local Authorities that commit capital funding from local sources.
- 11. CTC welcomes the Government's ambition to increase the percentage of children aged 5 to 10 that usually walk to school to 55 per cent (CDP 1.1). We would, however, recommend that there is similar encouragement for children to cycle to school. Currently, while we are experiencing an increase in cycle use for adult leisure (Active People Survey) and commuting (National Census), the level of English school children cycling to school according to the National Travel Survey is just over 1 per cent. This compares very poorly with Dutch levels where 50 per cent of all journeys to school are made by cycle.
- 12. CTC agrees that "strong leadership is critical at both a national and local level" (CDP 1.4; Action 6 p11)), however the draft CDP currently lacks reference to the stated role of partnership Government departments and other partners. The finalised CDP should include a clear and agreed summary of the role for other Government departments and partners. CTC believes key Government departments' roles should be as follows:
 - i. DCLG to promote cycling and traffic restraint in land use and development control policies, particularly in relation to parking standards
 - ii. Department for Health / NHS to promote cycling to staff, patients and population
 - iii. DfE to promote cycling in schools, e.g. ensuring curriculum time is available in both primary and secondary schools
 - iv. BIS to promote economic benefits and cycling in the workplace
 - v. Defra to promote cycling in outdoor areas e.g. Right of Way, Areas of Outstanding National Beauty and coast lines
 - vi. MoJ and the Home Office to promote strengthened road traffic law and enforcement respectively.
- 13. In order to oversee cycling's cross-departmental obligations, there should be a Cycling Champion who receives the full backing and support of the Prime Minister (CDP 1.3). The role needs to be a non-political position but with the authority to drive progress across Government. However, as demonstrated by the London Mayor's backing for his Cycling Commissioner, a high level of political support is absolutely necessary for the success of the role. Without such a commitment from the Prime Minister, the role would be of purely symbolic value and a poor use of public funds.
- 14. CTC welcomes the importance placed upon "leadership and vision" at a local level (CDP 1.6). CTC suggests that the proposed partnership arrangement should include what is effectively a voluntary version of the Active Travel (Wales) Act amended to suit the English context. In other words, Local Authorities would commit themselves to produce:
 - i. a map of existing cycling and walking provision; and



- ii. a second map outlining their aspirations for cycling and walking provision in the future.
- 15. Local Authorities should then be required to produce and follow a plan from map (i) to map (ii) committing the necessary funds to do so in partnership with national Government and/or the Active Travel Consortium. Performance and progress could then be measured by the Active Travel Consortium.
- 16. Local Authorities should commit to a high standard of cycle design for all road and traffic new developments and planned road maintenance. CTC recommends the establishment of national design standards (expanded on in paragraph 26).

Theme 2: Funding

- 17. CTC commissioned research by Lovelace and Woodcock² looking solely at the health benefits of cycling should the *Get Britain Cycling* targets be met. It estimated benefits of up to £6bn by 2025 and £25bn by 2050. The DfT's own study conducted by Dr Adrian Davis *Claiming the Health Dividend* also reported that the cost to benefit ratio of cycling is consistently higher than road or rail investment. Such reports provide ample justification for a long term consistent commitment to the reallocation of transport funding towards cycling. CTC backs the APPG on Cycling's recommendation of at least £10 per head per year, rising to £20 as cycle use increases (CDP 2.1).
- 18. Further work is being done by Lovelace and Woodcock to quantify the wider benefits of cycling beyond health terms. CTC aims to publish these later in November 2014.
- 19. The success of the CDP depends on an end to the current "stop start" practice of investment. Funding lines need to have long term backing and to be transparent so as to allow Local Authorities to plan appropriately. CTC would therefore encourage the DfT to publish a figure for the sum of seed funding which will be available for Local Authorities (CDP Action 3, p12).
- 20. CTC welcomed the Minister responsible for Cycling's words that "the £10 figure has [been] put...on record [and] that the Government intend[s] to work towards that aspiration"³. The Minister has proved he is a champion for cycling in Whitehall, however it is commitment, particularly consistent long term funding commitment, not aspirations which will get Britain cycling. Language such as "seek out" and "aspiration...to explore" is not helpful for the future of cycling, and needs to be replaced with definite terms (CDP 2.1).
- 21. CTC has therefore backed an amendment in the Infrastructure Bill which calls for a Cycling and Walking investment strategy. As well as encompassing actions on the strategic road

² Ibid. Lovelace & Woodcock

³ <u>http://www.theyworkforyou.com/debates/?id=2014-10-</u>

¹⁶a.487.0&s=goodwill+%A310+segment%3A23166308#g524.4



network (see CDP 2.6), this would ensure that cycling receives the same degree of long term planning and funding that our roads and rail currently receive.

- 22. Cyclists are disproportionately affected by poor road maintenance, which can cause very serious injuries and even occasional fatalities. 12 per cent of injury claims handled by CTC's solicitors on behalf of our members relate to "highway defects". CTC therefore welcomes DfT's intention to launch a consultation on the distribution of the highways maintenance fund (CDP 2.5). We would recommend, as has been demonstrated in New York and more recently Plymouth, that best value for money can be achieved when planned highway maintenance also includes the implementation of cycle provision.
- 23. On LEPs (CDP 2.7), CTC is concerned at findings from Sustrans and the Campaign for Better Transport⁴ indicating that LEPs are currently spending little or nothing on sustainable and active travel. CTC believes that both the DfT and DCLG must give a clearer steer to LEPs on the need to contribute to the national ambition to increase sustainable and active travel options in rural and urban areas alike.
- 24. CTC welcomes the theme's theory of partnership with local authorities rather than competition. We would like the CDP to make it clear from the start that Local Authorities can join this partnership at the outset and also during the 10 years that the CDP covers. However, there should also be a mechanism in place against Local Authorities failing in their commitments, such as cancellation of the partnership as a sanction. We believe that the Active Travel Consortium should be considered as the monitoring body for Local Authority performance.

Theme 3: Infrastructure and Planning

- 25. We welcomed the Prime Minister's ambition to "cycle proof" back in August 2013, and would encourage the Government to progress with all speed on making this a reality (CDP 3.1).
- 26. While welcoming the draft Plan's actions to promote good design, a "single point of information" (CDP 3.2) does not go far enough to prevent bad design. CTC strongly recommends that DfT develops national design standards building on the work of Transport for London (draft London Cycling Design Standards LCD2) and the Welsh Assembly (Active Travel (Wales) Act). CTC particularly recommends the assessment processes developed in those guidelines namely the Cycle Route Audit Tool (Wales) and Cycling Level of Assessment (TfL) as tools for assessing current and future road infrastructure. These audit processes would also provide an invaluable resource for on the job training of traffic engineers and planners and other relevant transport professionals.

⁴ See <u>http://www.bettertransport.org.uk/%C2%A32bn-local-growth-plans-ignore-smarter-travel-choices</u>



- 27. CTC would also like to draw attention to our Space for Cycling: a guide for local decision makers⁵. Effective local cycle planning can create comprehensive cycle route networks, enabling people of any age or ability to travel door-to-door in safe, convenient and enjoyable cycling conditions, for any local journey. Broad speaking this requires a combination of:
 - i. protected space for cycling along or when crossing major roads and junctions;
 - ii. low traffic volumes and speeds in town or city centres, in residential neighbourhoods, and on rural lanes; and
 - iii. traffic-free routes using parks and open spaces or the rights of way network. Such facilities complement rather than replace cycle-friendly roads, as a traffic-free network is unlikely to be comprehensive.
- 28. Ensuring transport professionals are trained and able to design good cycling infrastructure is a vital part of getting Britain cycling (CDP 3.2). However, as demonstrated in other areas of engineering where the UK is expert, such as pharmaceuticals or aerospace, long term funding will create sustainable careers, maintain a high skills base and attract new talent. Such expertise, when achieved, also has export potential, and could provide further cycle generated revenue.
- 29. CTC looks forward to the finalisation of the Traffic Signs and Regulations General Directions (TSRGD; CDP Action 4, p13), but believes in their current format they are not enough. We would like the TSRGD to clarify that vehicles turning left at junctions should give way to pedestrians and cyclists crossing their path, unless signals indicate otherwise. The TSRGD should also permit the "cycle scramble", which would allow cycle and pedestrian movements at signal controlled junctions. CTC believes, as evidenced by the success of the "cycle scramble" in the Netherlands and other European countries, that the risk of conflict between pedestrian and cyclist is minimal, while bringing considerable safety benefits.
- 30. Upon the finalisation of the TSRGD, CTC believes the Highway Code will need revising and that there should be an awareness campaign to communicate changes to all road users.
- 31. CTC welcomes the suggested six month review of planning issues (CDP 3.2), and we would recommend that this expands into the DCLG's provision of parking and other areas of development and location.
- 32. "Cycle proofing" of all transport modes (CDP Action 7, p13; Action 2, p14) is most welcome, and CTC believes that the DfT and partners deserve recognition for the good and ongoing activity by the Cycle Rail Working Group. This work needs to roll into other transport areas, and CTC would now like to see integration with tram, light rail, bus, aviation and shipping. The provision of cycle parking at stations and recent work done with rolling stock is

⁵ https://www.ctc.org.uk/sites/default/files/1404-space-for-cycling-guide-local-decision-makers.pdf r



particularly welcome, and CTC suggests that next steps in rail cycle integration should include the following objectives:

- i. better provision for voluntary reservations and ticketing;
- ii. improved signing and information for cycle boarding;
- iii. improved cycle access at stations; and
- iv. monitoring and evaluation of the cycle-rail experience.
- 33. CTC would recommend that the restructured Highways Agency (CDP 3.1) be tasked to act as a catalyst for good cycling infrastructure by enabling links between and beyond separate local authorities.

Theme 4: Safety and Perceptions of Safety

- 34. CTC welcomes and has been pleased to be part of the programme which addresses cycle safety issues and the public perception of cycling safety (CDP 4.1). However acknowledgement of these issues is not enough, and CTC believes this programme of work needs to be revived and accelerated.
- 35. CTC notes that the Government will "endeavour to continue funding Bikeability" (CDP 4.3). Endeavouring is not enough. The Government must commit to continue funding, not just for Bikeability Levels 1 & 2 which are geared towards primary schools, but also for training for secondary school students and adults (including Level 3). Creating an awareness of cycling at an early age is invaluable for developing a cycle culture in Britain. It will help to establish wider understanding of cyclists' actions on the road, both in the short term for parents of young cyclists and in the long term as young cyclists acquire driving licences and become the next generation of drivers. For this reason, CTC believes the Department for Education should be involved, to ensure curriculum time is made available for cycling at primary and secondary level.
- 36. Through our Road Justice campaign, CTC was instrumental in convincing the Ministry of Justice of the necessity for a review of road traffic offences. While we appreciate that such a review was announced in May 2014 (CDP Action 1, p15), the consultation period has still not begun. Following a high level of interest in the Westminster Hall debate on 05 November 2014 on Dangerous Driving sentencing, Victims Minister Mike Penning MP, responding for the Government, gave a strong sign of his and the department's support for this review. CTC would urge that the final version of the CDP should include a date for commencing this consultation.
- 37. CTC has not heard of any recent developments from either the DfT or MoJ on the action labelled "Increasing transparency on outcomes of cases from police, prosecutors and the courts and continue to explore ways of improving the quality of data" (CDP Action 4, p15). CTC believes that clear timescales should be in place for the linking of DfT STATS 19 collision reports with MoJ data on the prosecution, conviction and sentencing for driving offences. This will provide valuable data as to whether the justice system responds



differently (either positively or negatively) when cyclists are involved, whether as victims or suspects.

- 38. We are also disappointed that the draft CDP only highlights British Cycling in its action to promote "safe and sustainable school travel" (CDP Actions 4, p14). While recognising the work British Cycling does in this area is right, CTC initiated the development of Bikeability and has continued to deliver this training. We are also particularly keen to continue on offering Bikeability training to new areas, such as workplaces and under-represented groups in cycling, such as: women, health patients, those suffering from disabilities and other minority and disadvantaged groups. CTC believes that cycle training is an essential tool in initiating behaviour change (CDP Actions 5, p14), and reinforces cycling as a normal choice of transport for all ages, backgrounds and abilities.
- 39. The draft CDP's addressing of the high profile issue of lorry safety (CDP Action 3, p14) is exceptionally disappointing. Relegating this issue to a single action tucked away on the final pages of the report would suggest that this is not an issue taken seriously by the DfT. CTC calls for UK Government support for a new cab design at an EU level. CTC also urges DfT to research and promote European best practice at reducing lorries at peak hours, without resorting to tactics such as extending lorry length.
- 40. CTC also believes that it should be possible, without waiting for EU Guidance, to define a UK-wide requirement for the adaptation of shorter lorries in urban environments to accommodate high standards of direct vision.

Further points

- 41. Progression with the performance of the Government's cycling strategy should be reported to Parliament on an annual basis, not just to relevant Ministerial groups (CDP 5.2).
- 42. As part of the DfT's reporting on cycling, there needs to be an improvement in the monitoring of cycle use and walking. Ensuring that there is a good availability of cycle use data at both the local and national level will allow for a better assessment of safety which will be particularly useful for local planning.
- 43. In Annex B CTC notes DfT is calling for an expression of interest from local authorities. Through our national Space for Cycling campaign, we have been able to identify councillors and local authorities which see the benefit of better cycling provision. We would be happy to share such information, allowing the DfT to target local authorities already receptive to cycling. It would also be a useful mechanism for judging a local authority's commitment to cycling by indicating the number of supportive councillors.

CTC - the national cycling charity November 2014