

## **Cycle Safety Action Plan – response from CTC, the national cyclists’ organisation**

CTC, the national cyclists’ organisation, 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.

We are grateful for the opportunity to respond to the Plan – we note however, that it is not an official consultation subject to the formal consultation processes.

### **General principles of the plan**

The Plan suggests sensible aims, which we summarise as:

- to reduce risks of cycling whilst increasing cycling levels
- to improve perception of cycling as safe and attractive

We are pleased that Transport for London (TfL) appears to be adopting the idea that cycle safety be measured in terms of ‘risk’ rather than simply in numbers of collisions. This approach was adopted in the Department for Transport’s draft road safety strategy, *A Safer Way*, and was a key demand in CTC’s Safety in Numbers campaign earlier this year. We urge that a future target on cyclists’ safety be stated as a reduction in risk either per mile travelled or per trip.

We understand that the London Road Safety Unit (LRSU) is planning to commission research on the ‘safety in numbers’. We urge that the Plan takes note of the latest conclusions on this matter in the forthcoming Cycle Safety study for the DfT, as well as any forthcoming research from LRSU.

Even with the likely reduction in risks of cycling that will occur in future, if the target of a 400% increase in cycling is achieved the overall numbers of cycling injuries and deaths may still rise. This increase in numbers of injuries needs to be seen in the context of the likely overall improvement to public health. Recent research (see below) suggests that an 8 fold increase in cycling and doubling in walking would mean around a 50 fold *improvement* in overall public health, despite an overall increase in collisions.

### **Perception of cycling**

We agree that it is vital to improve people’s perception of cycling, by depicting it as ‘safe and attractive’. TfL’s ‘Catch up with the bicycle’ campaign was an

excellent example of promotion which markets cycling positively, rather than focusing on danger or discomfort. The current 'Do the test' cinema advertising effectively communicates the need to look out for cyclists but too often advertising campaigns (particularly when aimed at children) associate cycling with danger, undermining other promotional activities.

### **Understanding the true risks of cycling (or not cycling)**

We think that TfL could do more to publicise accurate figures on true risks of cycling. Not only are the risks consistently overestimated, we should remember that the overall health benefits of returning to physical activity is far greater than the risks of injury whilst cycling. CTC has regularly referred to evidence that those who physically active are, on the whole, healthier and live 2 years longer than those who are not.<sup>1</sup>

Recent 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 8 fold, walking doubled and car use was cut by 50%, the increase in premature deaths per million of the population from road traffic crashes (11) would be offset by savings of 541 lives from increased physical activity and reduced air pollution.<sup>2</sup>

We therefore suggest a clear statement from TfL of the overall health benefits to all from increasing cycling (and walking) is needed to reiterate the importance of prioritising these modes when making decisions on transport matters.

### **Cyclists' behaviour**

The Mayor recently stated his concern regarding cyclists' behaviour, implying that it was a major factor in cyclists' safety. While some cyclists do break the law, we believe that these behaviours should be put in the context of the very poor road user behaviour from motor vehicle users, much of which results in serious injury or death to vulnerable road users. By contrast, cyclists have a very low rate of involvement in injuries to other road users. Using figures obtained from the London Road Safety Unit CTC has calculated that per trip cyclists are less likely to injure a pedestrian either on the footway or having gone through a red light.

We do not wish to justify law-breaking – CTC strongly supports more traffic policing, and advocates responsible behaviour by all users. However, it is important in public communication not to whip up hysteria over the alleged 'dangers' of illegal cycling. Such behaviour tends only to cause intimidation and annoyance rather than actual danger. We firmly believe that the concern over

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<sup>1</sup> Paffenbarger R et al, *Physical activity, all-cause mortality and longevity of college alumni*. New England Journal of Medicine, vol. 314(10) pp 605-613, 1986 (for abstract see <http://content.nejm.org/cgi/content/abstract/314/10/605>).

<sup>2</sup> Woodcock J et al, 'Public health benefits of strategies to reduce greenhouse-gas emissions: urban land transport.' *The Lancet*. Published online 25<sup>th</sup> November 2009.

'cyclists behaviour' is therefore disproportionate when compared with the danger posed by illegal road use by motor vehicle users.

In addition, we suggest that some law-breaking activities are in reality a result of the failures of proper network planning for cyclists. Contravention of one-way streets is perhaps the most glaring example of a cyclist choosing a route perhaps for her own safety to avoid a major junction. Instead of accommodating these movements, the default position is to attempt to stop them. This situation has improved recently, with trials in Kensington and Chelsea, the City of London and funding for permeability measures in Lambeth.

However, many more one-way streets should be reverted to two-way working for cyclists. In Brussels, where 75% of previous one-way streets have been returned to two-way working for cyclists, evidence suggests that overall safety has improved.<sup>3</sup>

Cycle training courses should be offered as an alternative to fining first offender cyclists when apprehended by the police.

### **Driver training**

We support the focus taken in the document on improved driver training, especially for professional drivers. Not only may this have benefits in terms of improving safety for cyclists, it may also have an important impact in improving driver behaviour, thereby creating a road environment more welcoming to new or more frequent cyclists.

We hope that the promised 'taxi and minicab driver training to improve cyclist awareness' will be useful and we urge TfL to consider the scheme currently undertaken by Lambeth Borough Council as a model to follow and evaluate.

### **Cycle Safety Working Group**

We believe the proposal for a 'Cyclist Safety Working Group' is a good start but such a group would need the authority to properly co-ordinate a very wide range of activities conducted by many different parties. We also believe that such a group should be tasked with providing an annual report into cyclists' safety, including detailed information of the deaths and serious injury to all cyclists in London.

### **Remaining issues**

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<sup>3</sup> Dupriez B, 'Counterflow cycling in the Brussels Region' *Proceedings of Velo-City 2009 Brussels*.  
<http://www.velo-city2009.com/assets/files/paper-Dupriez-sub1.4.pdf>

CTC has already contributed comments on an earlier draft of the cycle safety action plan, and although the plan has improved we feel the need to reiterate some of our remaining concerns.

## **Cycle facilities**

The document peculiarly fails to mention London Cycle Network+ (LCN+). Although this project is led by the boroughs rather than TfL, it remains key to developing coherent cycle networks that overlap the existing road network, in some cases providing routes that increase permeability for cyclists and their safety.

The LCN+ remains unfinished, with certain key links unfunded and major barriers, such as heavily trafficked gyratories, still blocking key routes. These problems mean that novice cyclists are attracted onto quieter LCN+ routes which then give up when they encounter the major junctions on the major road networks.

## **Cycling Superhighways**

We have concerns that the design quality of the superhighways is too low for the expected growth in cycling over the next 15 years.

CTC believes that the design of these facilities, based primarily on the application of advisory cycle lanes using a different colour paint, fails to take into account the interventions higher up the Hierarchy of Solutions, namely reducing the volume and speed of motor traffic. Whilst we understand the need for continuity to ease wayfinding and improve confidence, the quality of the routes would benefit the most through measures that dealt with the problems associated with motor traffic first.

The use of the London Cycling Design Standard minimum width of 1.5 m is inappropriate for something marketed as a 'superhighway' since this gives insufficient widths for two cyclists to travel side by side. We believe that the cycle superhighways should be a minimum of 2 metres wide. This is the approach taken to infrastructure in parts of Europe where cycle flows are very high, such as in Denmark, where the use of blue painted cycle lanes is common.

Like the problems with the LCN+, the Cycle Superhighways appear to be doing little to tackle the major junctions which are the most significant barriers, both physical and psychological, to new cyclists.

In all other regards we believe the Cycle Superhighways project to be of considerable value, especially the provision of targeted cycle training and other smarter travel measures.

## 20 mph speed limits and zones

The most serious omission in the plan is that of 20 mph limits and zones. These have played a very important role in improving cyclists' safety and may also encourage greater use of these modes, whilst also helping to reduce emissions. The Government is heavily promoting their use in the forthcoming road safety strategy.<sup>4</sup> Combined with elements of the 'shared space' approach now in vogue, 20 mph can revolutionise safety in busy shopping streets.

Research just released shows that 20 mph zones are associated with an immediate 37.6% fall in cyclist KSIs and a 16.9% fall in casualties, although more recently the massive increase in cyclists means that the overall reduction in risk is drowned out.<sup>5</sup>

## Use of technology

Technological interventions within the vehicle are discussed briefly but a few critical areas are omitted. These missing issues include:

- Driver supervision systems
- Event data recorders
- Side sensors linked to in-cab warnings on cabs of lorries

The plan emphasises retro-fitting of side-guards and mirrors for HGVs. We believe that a few additional items should be included – event data recorders for post-crash telemetric evidence, driver supervision systems, which likewise capture pre and post-crash evidence, and sensors designed to warn both driver and cyclists of the danger of an imminent left-turn maneuver.

- ISA on all vehicles

We are pleased with TfL's current attitude to ISA and hope that the trials currently underway swiftly develop into the mainstream vehicle fleets.

## Enforcement

The Metropolitan Police need to be much more effective in enforcing road traffic law. Illegal, arrogant or bullying behaviour causes injury and death and creates an intimidating environment for the most vulnerable road users. The decision to cut both the Commercial Vehicle Education Unit, and, more recently, much of the

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<sup>4</sup> Paul Clark MP, Road Safety Minister, in a speech on 8<sup>th</sup> December 2009 -

<http://www.dft.gov.uk/press/speechesstatements/speeches/nationalroadsafetyconf>

<sup>5</sup> Grundy C et al, 'Effect of 20 mph traffic speed zones on road injuries in London, 1986-2006: controlled interrupted times series analysis' *BMJ* 2009; 339:b4469

capacity of the London Safety Camera Partnership – reducing the number of tickets sent to only 80,000 a year, down from over 300,000 presently.<sup>6</sup>

A zero tolerance approach to road traffic policing in North Wales led to an annual reduction of 278 KSI (Killed and Seriously Injured) casualties in 2005, compared with the late 1990s. The police were able to address the main causal factors for road crashes, which were speed, drink-driving and the failure to wear seatbelts. This approach was driven by the understanding that a low perceived risk of being caught was the primary reason for law-breaking.<sup>7</sup>

## **Lorries**

Although much of the plan deals specifically with lorries, the threat posed by lorries requires more than the simple remedies proposed. We believe TfL and the London Boroughs should be looking more closely at an overall strategy to restrict or put conditions on the use of these vehicles in central London. Not only would such as step improve safety for all users, it would have further environmental benefits from reductions in air and noise pollutions. TfL should be planning a comprehensive research programme to devise which interventions have the greatest effect on cyclist safety. These steps include many of those already listed:

- offering lorry drivers cycle training
- mandatory cycle awareness training as part of lorry driver training
- full provision of safety equipment on lorries
- fleet management to reduce trip numbers and improve driver behaviour
- traffic management to reduce interaction between lorries and cyclists, including restrictions and route planning.

## **CTC, the national cyclists' organisation December 2009**

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<sup>6</sup> 'Motorists may escape speeding fines following budget cuts'. *Evening Standard*, 11<sup>th</sup> November 2009

<sup>7</sup> Brunstrom R. *Casualty reduction programme* – blog posting on 20.12.2006. See [www.north-wales.police.uk/portal/blogs/cc/archive/2006/12/20/casualty-reduction-programme.aspx](http://www.north-wales.police.uk/portal/blogs/cc/archive/2006/12/20/casualty-reduction-programme.aspx).