Summary of Cycling UK's consultation submission on the

TRANSPORT DECARBONISATION PLAN

INTRODUCTION

Cycling UK was founded in 1878 and has 72,000 members and supporters. Historically known as 'CTC' or the 'Cyclists' Touring Club', Cycling UK's central charitable mission is to make cycling a safe, accessible, enjoyable and 'normal' activity for people of all ages and abilities. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits, both for individuals and for society.

Cycling UK has documented the economic, environmental, health and quality-of-life case for investing in cycling in other publications (e.g. our submission to the Commons Transport Select Committee's 'Active Travel' inquiry), hence we do not repeat them here.

Cycling UK has strongly welcomed the 6-point vision for a zero-emissions transport system, set out in Transport Secretary Grant Shapps's forward to Decarbonising Transport: setting the challenge. This report, issued in March 2020, set the scene for the Transport Decarbonisation Plan consultation. We particularly welcome his stated aim that:

> *"Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less..."*

We have also given our strong backing to the Government's recently published 'Gear Change' vision for cycling and walking, issued along with a new Local Transport Note LTN 1/20 on Cycling Infrastructure Design, and a consultation on revisions to the Highway Code to improve cycling and pedestrian safety. Although this response highlights some important omissions from the 'Gear Change' vision, overall we strongly support it, and this submission mostly focusses on specific policies needed to implement the vision.

The key omissions we wish to highlight are:

- The need for a wider *vision and targets to halt and reverse the growth of private motorised transport*, accompanied by appropriate policies and resource allocations, to ensure that road transport makes its 'fair' contribution to meeting the Government's 'net zero' target and, more imminently, updated carbon budgets in line with the 'net zero' target.
- A commitment to *lower the 'default' speed limits* for built-up streets and for non-built-up single-carriageway roads respectively.
- A commitment to *improve driver awareness of cycle safety* (through strengthening of driver testing and training, and through promotion of the Highway Code, including the changes now being proposed), backed by measures to *strengthen road traffic law and its enforcement*.
- Policies and funding allocations to *boost the diversity of people taking up cycling* (as well as their numbers), e.g. by supporting cycling projects for women, older people, people with disabilities and people from other disadvantaged groups or backgrounds (n.b. these policies should be additional and complementary to the proposals in 'Gear Change' to broaden the provision of cycle training, and to make cycling opportunities available through the NHS).
- Support for *bike sharing schemes*.

Our full set of recommendations for the Transport Decarbonisation Plan is as follows:

RECOMMENDATIONS

Sections 1 and 2 of this response focus primarily on reducing travel demand, by reducing both the number and the length of trips that need to be made. With shorter trip patterns, it then becomes easier to enable people to choose healthier and more sustainable transport options for those journeys (e.g. cycling, walking or public transport). Sections 3 to 6 are then concerned more specifically with the policy measures needed to boost cycling – recognising that there is a great deal of synergy between these policies and those needed to support walking and public transport.

The full version of this response, and a blog summarising it, are available at www.cyclinguk.org/decarbonising-transport-being-led-science.

1. ROAD TRAFFIC REDUCTION

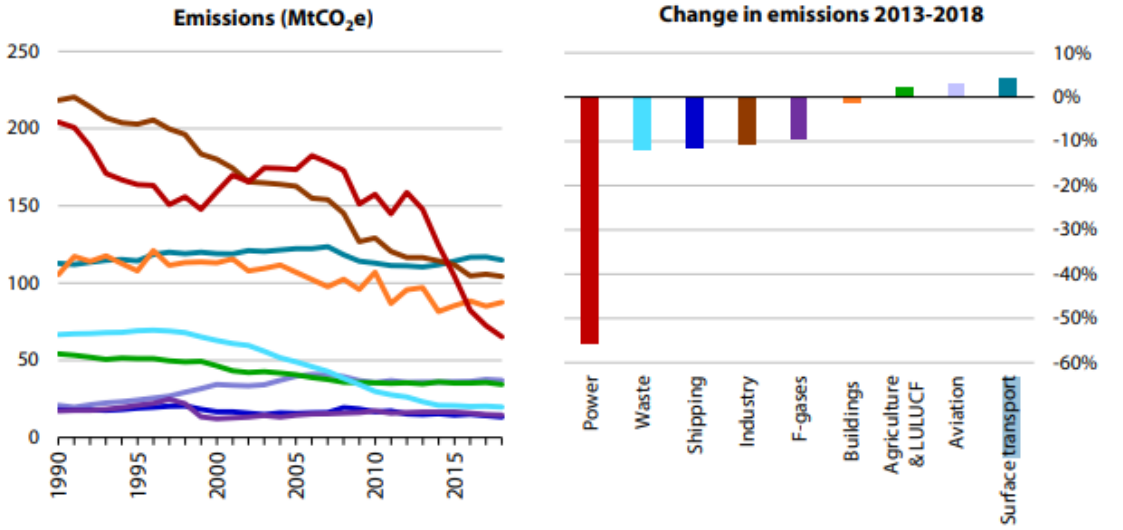
1.1. Set an explicit policy objective and an overarching road traffic reduction target to halt and reverse the growth of private motorised traffic, so that road transport contributes to meeting the Government's 'net zero' CO_2 emissions reduction commitment and consequent carbon budgets. Define targets for reduced trip-making and for increased use of active and sustainable transport modes, in line with this overarching target.

The need for road traffic reduction

The Secretary of State's 'Foreword' to Decarbonising Transport: setting the challenge contained the following very welcome statement of his vision for a zero-emissions future:

> *"Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less..."*

The UK's territorial emissions of greenhouse gases (i.e. excluding international aviation and shipping) have fallen steeply since 1990, largely thanks to sharp emissions reductions from the power and waste sectors (red and brown lines below). By contrast, transport's emissions (light blue line) have hardly changed over this period. Hence they have grown sharply as a percentage of the total, becoming the economy's largest emitting sector.



Source: BEIS (2019) *2018 UK Greenhouse Gas Emissions, Provisional Figures*; BEIS (2019) *2017 UK Greenhouse Gas Emissions, Final Figures*; CCC calculations.
Notes: The chart on the right-hand side shows changes in sectoral emissions between 2013 and 2018 for all sectors except for Agriculture, LULUCF, Waste and F-Gases which cover the period 2013-2017; buildings emissions in this chart are temperature-adjusted.

Improvements up to 2016 in the average vehicle efficiency of new cars have been largely offset by increases in road mileage. Since then, there has been a reversal in the average efficiency of new cars in the UK, due to a sharp rise in sports utility vehicle (SUV) sales.

The Committee on Climate Change (CCC, the Government's statutory advisor on meeting its carbon budgets under the Climate Change Act 2008) has strongly criticised the lack of progress on reducing transport emissions.

Other compelling reasons to reduce our dependence on motorised travel include:

- *Congestion:* This is estimated to cost the UK economy £30 billion a year.
- *Air pollution:* Pollution is estimated to hasten between 28,000 and 36,000 deaths annually in the UK, at an economic cost of £20bn or more. The UK Government has lost three court cases over its failure to keep pollution within legal limits.
- *Road danger:* The cost of road deaths and injuries in 2018 was estimated to be £35bn.
- *Physical inactivity:* Inactivity-related ill health costs the UK around £7.4bn annually.

The Transport Decarbonisation Plan (TDP) therefore needs to set out policies aimed at:

- Reducing travel overall – e.g. investing in broadband to reduce the need to travel for business meetings etc; and…
- Reducing the lengths of journeys – e.g. by planning and locating new developments such that housing, employment and retail opportunities are closer to one another (i.e. "destination shifting"); as well as…
- Enabling people to switch from car travel to healthier and more sustainable alternatives (i.e. "mode shifting").

Road traffic reduction targets

The TDP needs to set out how much motor traffic reduction is needed to meet the Government's 2050 'net-zero' target. The answer will depend on (a) how quickly the UK's vehicle fleet can be switched to fully battery-electric vehicles; and (b) how quickly the power supply for these vehicles can be decarbonised.

In a briefing for Friends of the Earth, consultancy Transport for Quality of Life (TQL) has estimated that, to be on course for a 'net zero' economy by 2045 (i.e. 5 years before the Government's subsequently-adopted target date), motor traffic will need to be reduced by 2030 by at least 20% – and by up to 60% under more pessimistic assumptions about how quickly we can decarbonise our vehicles and their power supply.

The TDP therefore needs to set targets for how quickly we will halt and then reverse the growth of motor traffic, ensuring that road transport is on track to meet its share of the Government's 'net zero' target and carbon budgets. Targets can then be set for increased cycling and other sustainable transport options (including not travelling at all for some trips), in a way that "follows the science".

Cycling UK calls for a legal duty to set road traffic reduction targets. This could be done either via the Environment Bill (which is currently before Parliament) or via the Road Traffic Reduction (National Targets) Act 1998. Councils could then be mandated to set local targets under the Road Traffic Reduction Act 1997.

1.2. Reduce travel demand through various pricing measures, to reflect the environmental and economic costs of consuming fuel and occupying both road and parking space. Earmark the proceeds for investment in active and sustainable transport alternatives.

There are various pricing mechanisms which can help reduce the demand for travel and the lengths of people's journeys, as well as switching the mode of transport used for these journeys.

Fuel duty

In terms of tackling greenhouse gas emissions, the most important policy tool is fuel duty, as it relates directly to fuel consumption and thus to CO_2 emissions.

However fuel duty has been frozen each year since 2011. As a result, pump prices were estimated to be 13% lower in 2018 than they otherwise would have been. Road traffic was therefore 4% higher – resulting in an extra 4.5m tonnes of CO_2 emissions (as well as increased NOx and PM_{10}s) – while public transport use was between 1.3% and 3.9% lower. It also cost the Treasury around £46bn in lost fuel duty revenue over that period.

Paradoxically though, success in decarbonising transport could worsen this loss of fuel duty revenue, by between £9bn and £23bn compared with the Treasury's projections.

Other policy levers

Nottingham City Council has applied a workplace parking levy since 2012, which has successfully restrained traffic, while also yielding funding for the city's tram system with the proceeds being used to fund the city's tram system. However, a wider-ranging levy on all private non-residential parking (e.g. including out-of-town superstores as well as business parks) could be even more effective in reducing demand for travel to car-dependent locations, while also giving councils a means of reviving their high streets. Incentivising people to make more local journeys would in turn boost walking, cycling and public transport use.

Another Transport for Quality of Life (TQL) report for Friends of the Earth found that:

- Charging an 'eco levy' for urban driving in Britain could raise £8bn annually;
- An 'eco levy' for driving on England's Strategic Road Network (i.e. its motorways and trunk roads) could yield another £5bn;
- A distance-based HGV charge aimed at recouping the costs which HGVs impose on society could yield around £7bn annually;
- The adoption of Land Value Capture for housing (i.e. allowing local authorities to assemble land for housing by buying it at 'existing use value', rather than allowing landowners to gain windfall profits from the future increases in the value of their land once developed) would yield around £11bn annually;
- A local payroll levy (similar to the 'Versement Transport' levy in France) could yield up to £7bn annually;
- A visitor lodging levy in Britain, based on a flat rate of £2 per overnight stay, could yield £1bn a year;
- A land value uplift levy (i.e. allowing local authorities to raise funds for transport projects by taxing existing landowners based on the increase in the value of their land following the transport project) could yield substantial sums. For instance, a TfL study of the potential for land uplift relating to 8 proposed transport schemes in London worth £36bn could unlock land for development with £24bn, while adding £63bn to the value of existing properties nearby.

The Government should adopt a package of traffic restraint measures that seeks to reduce demand for both longer-distance and urban travel, thereby aiming both to reduce the number and the length of car journeys, while earmarking the proceeds to improve the provision of (and support the use of healthy and sustainable alternatives.

1.3. Establish land use planning policies through the forthcoming Planning White Paper to ensure that new developments are located, planned and designed to reduce car-dependence and support active and sustainable travel. Ensure that roads, junctions and cycle routes associated with new development are designed in accordance with the new Cycling Infrastructure Design guidance, and that of suitable cycle parking is provided in all new developments.

Role of planning system

For decades, planning policies both nationally and locally have paid lip-service to the aims of supporting sustainable transport objectives. Yet a report by Transport for New Homes found that :

- Most housing developments are linked with road improvements– with locations often being chosen specifically to provide developer funding for roads. Road access is often seen as more important than proximity to town centre facilities or public transport.
- Large areas of land in new developments are given over to road and car parking, with little space left for tree planting, green space or an attractive public realm.
- As a result, residential densities are often as low as 20 dwellings per hectare. This worsens car dependence, by increasing the walking or cycling distances to key destinations, and by making demand for public transport services less concentrated.
- Conversely, walking and cycling routes, where they exist, are often out of the way, unlit and poorly surfaced. Good walking, cycling and public transport connections to other nearby destinations are even rarer.

There are notable exceptions, such as Leeds's Climate Innovation District, which show what can be done. Yet the fact is that they are exceptional. They need to become the norm.

The Planning White Paper, now out for consultation, is an opportunity to bring about the necessary changes. Cycling UK urges the adoption of planning policies to ensure that:

- Decisions about development sites should take full account of the CO_2 and other anticipated impacts of travel (environmental, health etc) arising from the development. Planning authorities should be mandated to refuse planning applications in locations that are likely to end up being car-dependent.
- The process for securing developer contributions should fully capture the increased value of the land to be developed. It should secure the funding for whatever sustainable transport provision is needed to prevent the development becoming car-dependent.
- The planning and design of road and other infrastructure within the development should seek to maximise the use of walking, cycling, public transport and car-sharing or ride-sharing arrangements. Provision for parking of private cars should be minimised accordingly.
- New developments should incorporate cycling and walking networks, planned and designed according to the Government's new Cycling Infrastructure Design guidance. Local streets should be designed on the assumption of a 20mph speed limit.
- Ample cycle parking provision should be made at all developments (including residential developments), for both their occupants (e.g. residents or employees, as appropriate) and for visitors.

2. FUNDING

2.1. Shift the balance of transport spending away from investment in new road capacity and towards active and sustainable transport as well as measures to reduce travel demand (e.g. broadband investment, car-sharing or lift-sharing initiatives), in line with the above targets for road traffic reduction and shift in transport modes.

2.2. Publish the 'Cycling Insights' report, updating it as required in light of the above road traffic reduction targets and the corresponding increases in use of cycling and other active and sustainable transport. Allocate capital and revenue funding accordingly.

Having set targets for traffic reduction in line with the UK's 'net zero' commitments – and for corresponding increases in sustainable alternatives – the Government should then allocate transport funding in line with these targets. This is likely to require a large shift of funding from the £27bn roads programme towards active and sustainable travel.

The Government has commissioned research from consultants Transport for Quality of Life (TQL) to determine the funding and other measures needed to meet its Cycling and Walking Investment Strategy (CWIS) targets to double cycling trips and increase walking by 2025. However this research remains unpublished, despite a commitment to do so.

The Government's £2bn allocation for active travel over the next 5 years represents a 6-fold increase in earmarked funding for cycling and walking. Although very welcome, we expect the TQL research will show this is only about a quarter to a third of what is needed even to meet these 2025 targets, let alone the much more ambitious targets needed to support the Government's wider aim for a 'net zero' transport system.

The lion's share of cycling and walking investment should be capital funding for physical measures, e.g. for implementing local cycling and walking networks, low traffic neighbourhoods and 20mph schemes, cycle-rail improvements and setting up bike share schemes. However around 20-30% should be revenue funding, to support cycle training and other behaviour change projects for people of all ages, backgrounds and abilities, as well as for Active Travel England and for professional support programmes.

3. INFRASTRUCTURE FOR CYCLING

3.1. Ensure that the Government's new 'Cycling Infrastructure Design' guidance is consistently applied in all highway and traffic schemes, and in all new developments, by establishing the proposed Active Travel England as quickly as possible, and ensuring it is adequately resourced for its intended role. Meanwhile, strengthen existing programme of support for local authorities to develop and implement Local Cycling and Walking Infrastructure Plans (LCWIPs), and develop suitable professional training programmes.

Cycling UK has strongly welcomed the Government's new Cycling Infrastructure Design guidance (Local Transport Note LTN 1/20). We wholeheartedly support its emphasis on quality (with protected cycle lanes being required on faster or busier main roads) as well as its requirements for 'coherent' and 'direct' cycle networks. We also strongly welcome the proposed funding incentives to ensure councils consistently adhere to it, not just for cycling and pedestrian schemes but for everything they do.

Yet after many years of cycling and walking being underfunded and under-prioritised, many councils lack the staff resources needed to plan and implement good cycle networks.

The 'Gear Change' vision proposes the setting-up of a new body, to be called Active Travel England. Its role will be partly to support local authorities in developing their plans, partly to assess their performance in implementing cycling and walking schemes, and partly to determine whether or not they should receive funding (based on their performance). It will also be a consultee on major developments. Cycling UK urges that Active Travel England should be set up to fulfil these roles as soon as possible.

In the meantime, we urge the Government to continue and increase its funding for an existing local authority support programme provided by a consortium comprising Sustrans, Living Streets and Cycling UK. This programme could be used (among other things) to build awareness and understanding of the new design guidance, among councillors, senior managers and practitioners alike.

3.2. Ensure that Highways England and HS2 Ltd act as models of good practice in consistently adhering to (or exceeding) the standards set out in the new Cycling Infrastructure Design guidance

With Ministers now expecting local authorities to consistently apply DfT's new cycling design guidance, it is clearly important that the two major infrastructure companies which are under ministerial control – HS2 Ltd and Highways England –consistently demonstrate best practice. Unfortunately neither has been doing so in recent years.

Although Highways England adopted some very good cycling infrastructure design standards in 2016, some of Highways England's regional offices have not been adhering to them – notably on the A14 and A428 schemes in the East of England.

The situation with HS2 is somewhat different. HS2 Ltd drew up (but has still never published) some technical standards for highways, without even telling (let alone consulting) Cycling UK or other members of DfT's 'Cycle Proofing Working Group. We believe this was in breach of legal assurances we received during the passing of the HS2 Phase 1 Bill (covering the HS2 route section from London to the West Midlands). These standards were worse even than DfT's now superseded cycling design guidance from 2008. Yet HS2 Ltd has so far dismissed all attempts to press for improved designs.

By chance, we were due once again to present our petition for an upgrade to HS2's design standards to the Lords Committee scrutinising the HS2 Phase 2a Bill (which covers the West Midlands to Crewe), on the very day that DfT's new design guidance was published. HS2 Ltd has therefore now undertaken to consult us on an upgrade. We hope this will now be done in good faith, and applied as fully as possible throughout the HS2 scheme.

3.3. Ensure that highway maintenance funding and procedures take account of cycle and pedestrian safety, e.g. by urging highway authorities to seek to improve cycling conditions when carrying out planned highway maintenance works (e.g. when resurfacing roads or carrying out bridge strengthening work).

Cyclists are disproportionately affected by potholes and other highway maintenance defects. To drivers, these can cause damage, but to cyclists (and indeed to pedestrians), such defects can result in serious injuries and even some fatalities.

For these reasons, pay-outs to cyclists for successful damages claims are, on average, 13 times higher than those made to drivers.

Yet local roads and streets, where walking and cycling is concentrated, have borne the brunt of recent highway maintenance cuts – even though cuts to local road maintenance have a substantially higher economic cost than cuts to trunk road maintenance.

As well as shifting transport funding from national roads towards local active and sustainable transport projects, a corresponding shift is needed towards the maintenance of existing (rather than new) provision, particularly more local roads and paths.

Meanwhile the Code of Practice on 'Well Managed Highway Infrastructure' should be revised to better reflect the risks cyclists face from potholes, e.g.: (i) their position relative to the edge of the road; (ii) whether their size, shape and alignment is likely to cause a cyclists' wheels to get trapped in them; (iii) whether they are at or near junctions; and (iv) whether they are on gradients. Highway inspectors should be trained in these issues. Instrumented bicycles should be used to assess the evenness of road surfaces.

The safety of cycling should also be taken into account in setting up temporary traffic management arrangements when carrying out road and street works.

When Councils are carrying out carriageway resurfacing or similar planned maintenance work, they should look for cost-effective opportunities to introduce cycling and walking improvements (e.g. light- segregated cycle facilities, coloured surfacing) at the same time.

For more on these issues, see Cycling UK's briefing on highway maintenance and its submission to the Commons Transport Committee's inquiry on Local Roads Funding.

3.4. Integrate the Local Cycling and Walking Infrastructure Plan (LCWIP) and Rights of Way Improvement Plan (RoWIP) processes, to connect urban and rural cycling and walking networks, supported by access funding opportunities from the Agriculture and Environment Bills currently before Parliament.

Local Cycling and Walking Infrastructure Plans (LCWIPs) have so far been predominantly urban – and with current funding, this looks set to continue. However opportunities are therefore being missed to improve the connections between predominantly urban LCWIP networks (which aim to support day-to-day walking and cycling) and Rights of Way Improvement Plans (RoWIPs), which are more rural and recreation-focussed).

Yet this distinction needs to be blurred, particularly in 'urban fringe' areas. By doing so, school pupils in outlying villages (for instance) could be enabled to walk or cycle safely via off-road routes to schools in nearby towns – while families in those towns could go out walking or cycling in the surrounding countryside without having to drive to get there.

There is an opportunity to do this, via two Bills which are currently before Parliament. The Agriculture Bill allows for agricultural subsidies (i.e. the replacement for the Common Agricultural Policy) to be allocated to improving public access, in line with the principle of "public goods for public subsidies". However the Environment Bill fails to cite 'public access' as a key priority. Worse still, it hardly features in the draft documentation of the Government's Environmental Land Management scheme (which is supposed to give effect to the "public goods for public subsidies" principle).

The experience of lockdown has really heightened awareness of the health and wellbeing benefits of access to nature. Yet at present, riders of horses and pedal cycles only have access to 22% of England's rights of way – and some of that 22% is unsuitable in practice. Using post-CAP agricultural subsidies could help increase access, with benefits for our health, wealth, wellbeing and the climate.

4. OTHER SAFETY MEASURES

4.1. Reduce the 'default' speed limits, to (a) 20mph for built-up streets; and (b) no more than 40mph for non-built-up single carriageways.

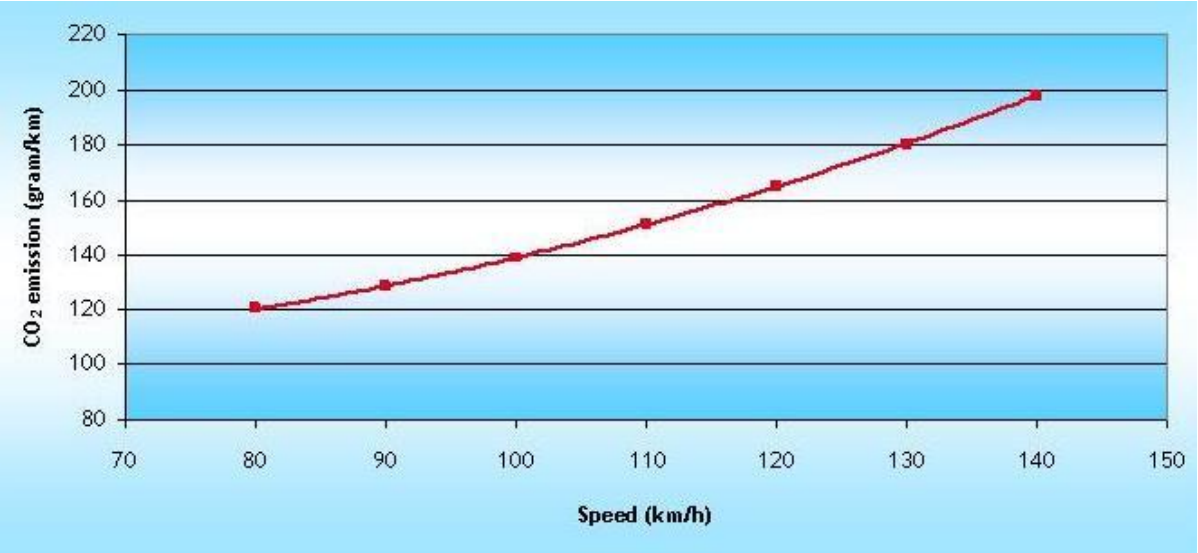
Lowering speed limits can reduce both the risk and severity of road casualties, enabling young, old and disabled people alike to walk and cycle in safety. It can also cut CO_2 and pollutant emissions, both by reducing stop-start driving and by boosting walking and cycling.

The Welsh Government and Senedd have recently agreed to progress towards replacing 30mph with 20mph as the 'default' limit in Wales for built-up streets with street-lighting – i.e. it will become the limit that applies unless road signs indicate otherwise (e.g. a limit of 30mph or higher). To minimise street clutter, it surely makes sense to concentrate speed limit signs on the vehicle-dominated main roads rather than on residential streets.

Welsh Councils will be given time to identify roads in their area where current speeds are significantly above 20mph, and to decide whether these roads should retain their 30mph (or higher) limits, or be redesigned to make the 20mph limit self-enforcing.

Cycling UK believes that adopting a similar policy in England would strongly complement the Government's enthusiasm for Low Traffic Neighbourhood schemes (as expressed in its 'Gear Change' vision), which we wholeheartedly share. It would also be popular: 72% of the public supports 20mph limits for residential streets, with just 14% against.

We also advocate a similar approach to lowering speed limits on non-built-up single carriageways. This would, if anything, have even larger CO_2 reduction benefits, given the relationship between CO_2 emissions and speeds.



Source https://www.ce.nl/publicatie/why_slower_is_better/948

Many narrow country lanes have 60mph limits by default, even though this is often an obviously unsafe limit. Hence it would similarly make more sense to lower the 'default' limit for non-built-up single carriageways to a speed that was relatively safe for all users, while allowing highway authorities to retain or adopt higher limits where appropriate (e.g. on wider and straighter single-carriageway main roads).

For both built-up and non-built-up speed limits, we support the use of average-speed camera systems to facilitate enforcement.

4.2. Strengthen driver awareness of cyclists' safety needs and how to respect these, by: (a) incorporating cycle training into the processes for driver training and testing; and (b) mounting public awareness campaigns, notably to communicate the current draft Highway Code rule changes.

Respect for the rules of the road, by all road users, is important to give people the confidence to take up cycling, and to prevent them from being intimidated into giving up.

Securing respect for traffic rules involves a combination of education and enforcement, as has been shown by half a century's experience of tackling drink driving. Education is needed to raise awareness of the rules and why they matter. But those who continue to behave irresponsibly must be seen to face appropriate sanctions.

Integrating cycle training into driver training and testing processes

One way to boost cycle awareness among drivers, as well as to boost cycle use directly, is to make cycle training integral to the driver training and testing process.

Cycling UK strongly supports the commitment in the Government's 'Gear Change' vision to make cycle training available to adults and teenagers, as well as younger children. We also believe all learner drivers should undertake level 3 cycle training, with this being compulsory for driving instructors and all other professional drivers (with suitable alternatives for people with disabilities which prevent them from cycling).

The driving theory test should examine candidates' awareness not only of the rules of the road but also the reasons behind them; while both the theory and hazard perception tests should examine their awareness of how to respect cyclists' safety.

Cycling UK supports the principle of 'graduated driver licencing'. This system sets a minimum period or a minimum amount of learning time before candidates can take their test, with provisional restrictions (e.g. on carrying passengers at night) for a period after passing.

The Government should also consider periodic driver retesting, including professionally administered sight tests, particularly for older drivers.

Disqualified drivers, those who have accumulated 12 penalty points, and those convicted of serious driving offences, should take a compulsory re-test linked to remedial training.

The Highway Code

Cycling UK strongly welcomes the current consultation on revisions to the Highway Code, aimed at improving safety pedestrians and cyclists, particularly at junctions and crossing points. However, if and when these new rules are adopted, it will be essential to ensure drivers are made aware of them. The Government must therefore make provision for a significant public awareness campaign, covering the proposed new rules on:

- Pedestrian and cyclist safety and priority at junctions;
- Leaving ample space when overtaking cyclists and equestrians;
- Opening car doors safely using the 'Dutch Reach' – i.e. using the hand on your opposite site to the door you want to open (e.g. using your left hand to open a door on your right) – making you turn your head so that you are more likely to see an approaching cyclist;

- Why cyclists are trained to position themselves in the centre of their lane in certain situations (rather than near the left hand side of the road), and why is important for drivers to respect this.

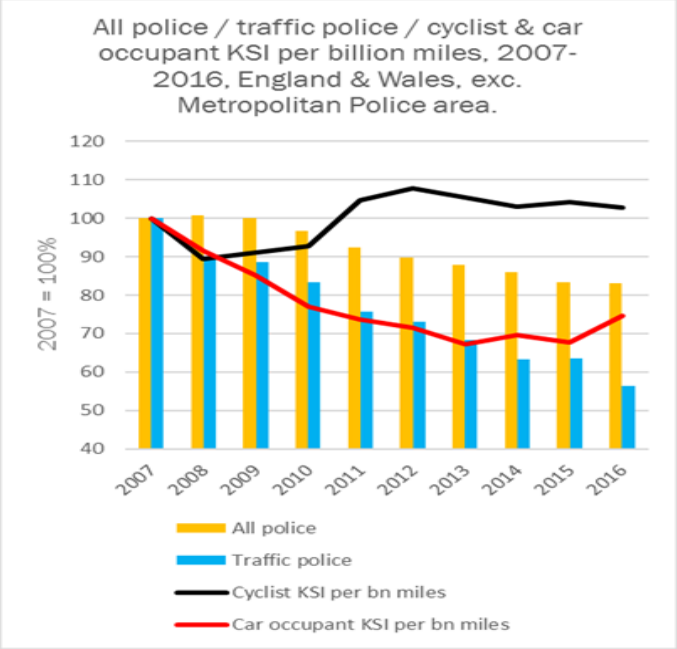
4.3. Strengthen road traffic law and its enforcement by: (a) boosting the priority and resourcing of roads policing and other enforcement bodies (e.g. the Traffic Commissioners, Health and Safety Executive); and (b) carrying out a comprehensive review of road traffic offences and penalties, including the definitions of 'dangerous' and 'careless' driving.

Roads policing and other enforcement bodies

Visible roads policing is a highly effective road safety measure. It is important not just for deterring road crime but also for investigating it when it happens, and for supporting victims and their families.

Yet roads policing has faced disproportionate cuts in recent years. This may well explain why road deaths are no longer falling, as they had done for several decades prior to 2010.

Roads policing should be prioritised in national governments' policing strategies, e.g. the 'Strategic Policing Requirement' for England and Wales. Police and Crime Commissioners and individual police forces would then be better resourced to recruit and train the skills needed.



There also needs to be better collaboration with other bodies with roles in traffic law enforcement and regulation, including the Traffic Commissioners, Health & Safety Executive and the Driver and Vehicle Standards Agency – following the model of the London Freight Enforcement Partnership.

Road traffic offences and penalties

All too often, driving which has caused obvious 'danger' ends up being dismissed in law as a 'careless' (rather than 'dangerous') offence, resulting in very lenient sentences. This concern was echoed by the Commons Transport Select Committee in 2016, and in a subsequent Commons debate. Yet a comprehensive review of road traffic offences and penalties, promised in 2014, was later reduced to the much more limited set of proposals, as reiterated in the 'Gear Change' vision document.

We continue to call for clearer, or amended, definitions and penalties for 'careless' and 'dangerous' driving, and their equivalents involving serious or fatal injury.

4.4. Reduce the use of road freight, and the danger it poses to other road users, by: (a) maximising the use of rail and waterborne freight; (b) requiring the progressive adoption of 'direct vision' lorry cabs; and (c) maximising cargo-bike use for 'last mile' deliveries'.

Although heavy goods vehicles (HGVs) are involved in relatively few cyclist collisions, these are much more likely to prove fatal.

Compared with buses, lorry cabs typically make it far harder for lorry drivers to see cyclists or pedestrians alongside or in front of them. Yet 'direct vision' cabs are now becoming more common, reducing this potentially lethal risk.

We therefore welcome the 'Gear Change' vision document's commitment to explore the progressive adoption of direct vision lorries, following Transport for London's lead.

Measures should also be taken to reduce urban lorry traffic, e.g. by making greater use of rail and water-borne transport. Another solution is edge of town 'trans-shipment depots', where HGVs or trains can transfer loads onto smaller, more street-friendly lorries or electric cargo bikes for delivery to their final destination. Again, we welcome the commitment in 'Gear Change' to explore this option.

Action is needed to maximise the potential for cargo bikes to make urban deliveries.

5. OTHER TRANSPORT MODES

5.1. Support the combination of cycling with travel by train, bus, tram and other public transport by: (a) improving access to and provision for cycling at stations, stops and interchanges; (b) improving opportunities to carry pedal cycles on trains and other public transport vehicles; (c) improving information and customer service for those wishing to combine cycling and public transport; and (d) strengthened stakeholder consultation and monitoring to identify what is working and where improvements are needed.

Supporting the combination of cycling and public transport could provide significant benefits for travellers, for public transport operators and for the wider public good:

- *For passengers,* the combination is a healthy and convenient door-to-door alternative to driving, particularly for those who cannot do so.
- *For public transport operators,* it boosts the catchment area for public transport services 16-fold, increasing their economic viability. It also reduces the costs of providing car parking, releasing valuable land for other uses.
- *For society,* it reduces the environmental and other impacts of car-dependence, while strengthening local economies (and their public transport services) in rural areas.

We are therefore pleased that the Government's 'Gear Change' vision includes commitments to enhance opportunities to combine cycling with both rail and bus travel.

The key measures for increasing the combination of cycling and public transport are:

- *Access to and facilities at stations and interchanges.* This needs to include:
  - Ample secure cycle parking, which needs to be conveniently located, clearly signed, sheltered and secure.
  - Cycle storage and hire facilities at larger stations – ideally including 'docking stations' for a local bike-hire scheme.
  - Access to, from, within and through the station. This includes convenient and well-signed links with the surrounding cycle network, as well as lifts or, failing that, well-designed wheeling ramps to assist cycle users in dealing with flights of steps.
- *Cycle carriage provision on new and refurbished public transport vehicles.* This should be designed to be easily useable by cycle users of all abilities, including those who use non-standard pedal cycles as mobility aids.
- *Customer information and services.* This should include:
  - Cycle reservation systems for any train service on which seats are also reservable. Cycle reservations should be optional, unless reservations can be made in real time up to shortly before the train arrives at the station.
  - Information about what services cycles can and cannot be carried on.
  - Information on where to stand on the station platform in order to load a pedal cycle without delaying the train.
- *Stakeholder engagement and monitoring.* This should include:
  - Collection of data on the use of cycle parking, storage, hire and carriage facilities, to assess what is working and to help prioritise future improvements.
  - Engagement with cycle-rail user forums, including consultations on any peak-time restrictions on cycle carriage, to ensure these are designed to be reasonable and do not exclude the use of services at uncongested times and places.

5.2. Support the development and use of public bike hire and sharing schemes.

Bike hire and bike sharing schemes, whether staffed (e.g. at stations), docked (such as London's Santander Cycles) or dockless (such as those run by companies like Ofo and Mobike) can provide excellent 'try-before-you-buy' opportunities for people considering cycling. Schemes which offer opportunities to try out electrically-assisted pedal cycles (or 'e-bikes') or non-standard cycles (e.g. tricycles, which may be needed for people with some disabilities) can be particularly valuable for disabled people, health patients or others from disadvantaged groups, who could not otherwise afford the risk of buying an e-bike or non-standard cycle, without first deciding whether they will benefit from it.

A recent survey found that on-street bike hire schemes are widely used in combination with public transport; that they attract a high proportion of female users; and that they are effective at persuading people to switch from car travel.

However, the bursting of the 'dockless bubble' has highlighted the need for some public funding to procure economically viable bike hire schemes. In more disadvantaged areas (where vandalism and theft are more common), some revenue funding is also likely to be needed to provide healthy mobility for people who may face multiple disadvantages.

5.3. Adopt a 'Safety first' approach to regulating new transport technologies, seeking to maximise potential environmental and other benefits whilst avoiding potential safety and other threads to cycling, walking and other sustainable transport options

New technologies, such as autonomous vehicles and 'micromobility' vehicles (e.g. e-scooters), offer the prospect of reduced car use as well as greater safety. However, they present risks as well as opportunities. To maximise the former while minimising the latter, Cycling UK advocates a precautionary approach to legalising both these vehicle types.

Automated (or 'autonomous') vehicles (AVs) could help people reduce the need to own private cars (they could summon an AV instead when needed), while improving access to cars for those who otherwise could not drive. However, if not regulated carefully, they could pose a real threat to pedestrians and cyclists. AV use may initially be acceptable on motorways, and perhaps on trunk roads with high-quality separate cycle tracks. However great care should be taken before allowing their use on roads that can also be shared with pedestrians and cyclists. For more, see Cycling UK's response to the Law Commission's AV consultation.

Similarly, electric scooters ('e-scooters') and other 'micromobility vehicles could provide a low-emissions alternative to driving, as well as boosting the case for protected cycle lanes and well-maintained road surfaces. However there is a balance to be struck between allowing their maximum speed and power to be high enough to attract people out of their cars, without making it so high that they undermine the health benefits of cycling (which involves physical activity), and the safety of pedestrians (particularly more vulnerable groups). See Cycling UK's response to the Government's 'Future of Technology' consultation.

6. CYCLING OPPORTUNITIES FOR ALL

6.1. Support programmes (in addition to the planned expansion of cycle training and the plan for 'cycling on prescription' through the NHS) to boost cycle use among groups who are under-represented in cycling, including women, older and disabled people, people from black and minority ethnic communities and other disadvantaged groups.

Cycling UK strongly welcomes the commitments in the 'Gear Change' vision document to extend the provision of cycle training for adults and children of all ages, including disabled people using adapted cycles. We also welcome its plans to pilot schemes in which GPs prescribe cycling for people with inactivity-related health conditions.

Nonetheless, we believe there is more that could be done to boost the diversity (as well as the number) of people taking up cycling.

There is good evidence that cycle training and other behaviour-change programmes can be highly cost-effective ways to boost cycle use, particularly among groups such as women, older people, BAME communities, health patients and people with disabilities.

Cycling UK's Cycling for Health programme could be a model for the Government's social prescribing programme. It has very high take up among women, people from black and minority ethnic groups and other under-represented communities – as do our Big Bike Revival (BBR) and Community Cycle Clubs programmes.

We urge the inclusion of sufficient revenue funding in the next Cycling and Walking Investment Strategy to support these programmes, in accordance with the Government's 'levelling up' agenda.