

Cycle Safety Action Plan

Consultation Report – prepared by Steer Davies Gleave for
Transport for London



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Executive Summary

Overview

TfL consulted with the general public and stakeholders on the draft version of the new Cycle Safety Action Plan (CSAP) for London. CSAP outlines 32 key actions which will directly target the key factors in collisions and help further reduce cyclist casualties across London.

The consultation consisted of a single open question, seeking general comments and feedback on the document. A total of 69 responses were received, of which 42 were from the general public, and 27 were from stakeholders.

Summary of responses

The majority of comments from the general public to CSAP concentrated on three themes: Design, Behaviour and Enforcement.

Within the overall theme of Design, the primary comments related to the need for more segregation of cycle infrastructure, improvement in the design of road junctions, and comments around improving cycling infrastructure more generally.

Within the theme of Behaviour, the most prominent comment was a need for an improvement in cyclists' behaviour to improve cycle safety, rather than investment in cycle infrastructure.

Within the theme of Enforcement, these comments centred largely on a desire to see greater enforcement of infringements for all road users (i.e. not just cyclists or car drivers).

Amongst stakeholder responses, there was general support of the consultation and of CSAP itself. In contrast to the responses from the general public, the majority of the stakeholder responses contained comments or suggestions to individual actions contained within the document, rather than general comments on the entire plan.

1 Introduction

The Cycle Safety Action Plan

- 1.1 This report details the results of the consultation on the draft Cycle Safety Action Plan.
- 1.2 The Cycle Safety Action Plan is designed to address the concerns and challenges faced by cyclists across London, helping to make London a place where cyclists truly feel they belong and are safe. This is the second iteration of the Action Plan, with the original produced in 2010.
- 1.3 This new draft Cycle Safety Action Plan (CSAP) builds on the original, as well as drawing on elements of both the Mayor's Cycling Vision and the Safe Streets for London report. It has been developed with the insight and expertise of key stakeholders who have regularly met as a working group and contributed to the actions. These stakeholders consisted of the following organisations:
- Metropolitan Police Service;
 - City of London Police;
 - London Cycling Campaign;
 - Cycling Touring Club;
 - Sustrans;
 - Roadpeace;
 - British Cycling;
 - Freight Transport Association;
 - Road Haulage Association;
 - The Association of Bikeability Schemes
- Representation from London boroughs was provided through the London Government Technical Advisers Group (LoTAG), London Councils and the Borough Cycling Officers Group (BCOG).
- 1.4 The new draft plan focuses on understanding the risks and challenges faced by cyclists on London's roads and uses an intelligence-led approach to identify the most effective and significant interventions.
- 1.5 The draft plan outlines 32 key actions which will directly target the key factors in collisions and help further reduce cyclist casualties across London. The actions include:
- Together with partners, TfL will improve the safety of cyclists around lorries by trialling quiet vehicle technology to expand off-peak delivery, separating cycles from lorries in rush hour, working with industry to develop for the first time new front under run protection, and working with operators to develop and test better designs for side guards.

- TfL will lobby vehicle manufacturers and representative organisations to make vehicles safer for cyclists by pushing for Autonomous Emergency Braking Systems to be fitted to all new cars as standard, and for a specific new European New Car Assessment Programme (EuroNCAP) safety rating for cars' impact protection of cyclists and for EuroNCAP to extend its star score ratings to include buses and HGVs for non-occupant safety.
- TfL will lobby the Department for Transport to emphasise the prominence of cycling and the safety of cyclists and other vulnerable road users by identifying improvements in the Highway Code and better aligning it with advice from National Standards (Bikeability) training.
- Together with London boroughs, TfL will double the number of adult cyclists receiving advanced safety skills training.
- In partnership with the Metropolitan Police Service and City of London Police, TfL will double the number of Exchanging Places events aimed at cyclists to 100 per year.

Figure 1.1: The Cycle Safety Action Plan



2 Methodology

Consultation & Promotional tools

- 2.1 TfL emailed selected key stakeholders and published the draft CSAP on TfL's consultation portal.
- 2.2 TfL worked with cycle safety stakeholders through the Cycle Safety Working Group (CSWG) to produce this draft document, including the London Cycling Campaign, British Cycling, CTC, the national cycling charity, Sustrans, Roadpeace, The Association of Bikeability Schemes, the Freight Transport Association and Road Haulage Association and borough representatives through London Councils and LoTAG. CSWG members were also given the opportunity to feed back their comments in person as well as through TfL's consultation portal so that any major concerns they had could be discussed in detail.
- 2.3 TfL's consultation portal is hosted online and can be viewed by the general public.

Managing Responses

- 2.4 Respondents to the consultation were encouraged to submit their responses on the relevant page on TfL's Consultation Portal.

Consultation Questionnaire

- 2.5 The consultation consisted of a single open question, asking for comments and feedback on the action plan.

Coding

- 2.6 A code frame was developed for the open question, in order to classify the responses. The code frame comprised of six overall themes and, within these, specific comments. Drafts of the code frames were shared with TfL for agreement throughout the coding process.
- 2.7 The six overall themes included within the code frame were as follows:
 - Design: these comments relate to the need for better road/junction design in order to improve cycle safety. Some of these comments related to specific locations;
 - Behaviour: these comments focus on suggestions to improve the behaviour (of both cyclists and other road users) in order to improve cycle safety;
 - Enforcement: these comments focus on the need for more enforcement of the law in order to reduce the number of road user infringements;
 - General Support: Comments indicating general support of the consultation and of the Action Plan;

- Comment on the Consultation: Comments on specific elements of the consultation (e.g. figures in the document, or comments directly relating to certain actions within CSAP); and
- Comment on Cycling Policy: Comments more generally on Cycling Policy in London.

2.8 All open responses to the consultation were coded. During the process it was necessary to add additional codes to the code frames as appropriate. Individual comments were coded to one or many of the codes within the code frame as relevant.

3 Analysis of Consultation – Public Responses

Introduction

- 3.1 Across the 42 responses received from the general public, there were a total of 107 comments made as part of those responses, each categorised into one of the six key themes.
- 3.2 The two key themes with the greatest number of comments were Design and Behaviour. A summary of the number of responses by theme is shown below:

Table 3.1: Comments by Key Themes

Key Theme	Number of Comments	% of total
Design	43	39%
Behaviour	26	24%
Enforcement	18	17%
Comment on the Consultation	9	11%
General Support	8	7%
Comment on Cycling Policy	3	3%
Total	107	100%

Analysis of Key Themes

Design

- 3.3 There were 42 comments in total on the subject of the design of roads and of junctions and their impact on cycle safety, with these then categorised into twelve sub-headings. These sub-headings (and the frequency with which they were mentioned) are listed in the following table.

Table 3.2: Comments relating to Design

Comment/Suggestion	Number
Need for more segregation for cyclists	9
Need to improve existing infrastructure	9
Better design of junctions	8
Comments on design at specific locations	4
Current design of cycle routes is dangerous	4
Greater consideration of pedestrians	3

Comment/Suggestion	Number
Infrastructure needs to be improved to consistent standards	1
Lower speed limits	1
Reallocation of road space to cyclists is required	1
Education is less important than infrastructure improvements	1
Cycle Safety could learn from improvements in motorcycle safety	1
Consider allowing cyclists to turn left on a red light	1
Total	43

Need for more segregation for cyclists

- 3.4 As demonstrated in Table 3.2, one suggestion raised by a number of respondents is the need for more segregation for cyclists to provide greater security and safety. These respondents talked about the value of having clear, defined boundaries between cyclists and other general traffic, and highlighted other European countries such as Denmark and Germany that have followed this example.

Need to improve existing infrastructure

- 3.5 Another comment most frequently noted was the need to improve existing poor quality infrastructure in order to eradicate accidents caused by poor quality design. These comments related not only to the design of roads and junctions being hazardous to cyclists, but also that poor maintenance of cycle infrastructure is forcing cyclists into dangerous situations on the road.

Better design of junctions

- 3.6 Other popular comments related to the design of junctions, with a number of people stating that better design of junctions is required, with some going further to say that they feel that some current junction designs are dangerous.

Comments on design at specific locations

- 3.7 Whilst many of the comments relating to design were on a general scale, some comments mentioned specific locations across London where they felt that the road design was creating dangerous situations for cyclists.
- Tower Bridge/Tower Hill junction. This was described as being “very hectic”, with paving in a poor condition. There was a suggestion that advance cyclist lights should be implemented to help cyclists clear the junction quickly and safely ahead of motorists entering or exiting the bridge.
 - Euston Road. This was provided as a more general example of a location where the design is unsafe and the road condition is deteriorating.
 - Kennington (A23/A3 junction). This was provided as an example where a car turning left would be required to cross over a cycle lane going straight on at the junction.
 - Millbank/Vauxhall Bridge Road. The person making this comment suggested that rather than forbidding a left turn at this junction, a better option would be to introduce phased traffic light signals for cyclists.

Greater consideration of pedestrians

- 3.8 Some respondents highlighted the need for greater consideration for pedestrians as well as cyclists in the design of infrastructure, particularly on routes where pedestrians and cyclists

share the space. One respondent highlighted the need to remember that the number of pedestrians far outweigh the number of cyclists, and are often far more vulnerable than cyclists (for example small children or the elderly).

Behaviour

- 3.9 There were 26 comments related to behaviour, with these then categorised into six sub-headings. These sub-headings (and the frequency with which they were mentioned) are listed in the following table. These sub-headings (and the frequency with which they were mentioned) are listed in the following table.

Table 3.3: Comments relating to Design

Comment/Suggestion	Number
Improving cyclist behaviour	11
Greater awareness by car drivers	6
Greater awareness by bus drivers	4
Greater awareness by taxi drivers	3
Car drivers need to understand the cyclist perspective	2
Total	26

Improving cyclist behaviour

- 3.10 The key comment with regards to behaviour was the need for an improvement in the behaviour of cyclists. Many of these comments highlighted actions or specific behaviours exhibited by cyclists (e.g. ignoring traffic signals and cycling on the pavement), and specifically that TfL should be concentrating on tackling these habits in order to improve cycle safety, rather than investing in cycle infrastructure. It should be noted that these comments came from both cyclists and other road users.

Improving behaviour of other road users

- 3.11 Conversely, the other comments relating to behaviour suggest improvements in the behaviour of other road users to help improve cycling safety.

Greater awareness by car drivers

- 3.12 The majority of these responses were centred on car drivers, and the need for them to have greater awareness of other road users (not just cyclists), and also to consider the road from the cyclist perspective. A number of respondents highlighted the need for drivers to be held truly accountable for driving dangerously, without due care and attention.

Greater awareness by bus and taxi drivers

- 3.13 There were a number of concerns raised by respondents that there was too much emphasis on safety regarding private vehicles, and not enough on others, particularly buses and taxis. Some respondents felt that not enough care is taken by bus drivers when driving in bus lanes or when pulling into bus stops. Similarly others felt that taxi drivers should have greater consideration for cyclists when pulling in towards the kerb to pick up passengers.

Enforcement

- 3.14 There were 18 comments related to enforcement, with these then categorised into eight sub-headings. These sub-headings (and the frequency with which they were mentioned) are listed in the following table.

Table 3.4: Comments relating to Enforcement

Comment/Suggestion	Number
Need for greater enforcement	6
Police officers require greater training on cycling	3
Greater cyclist accountability	3
Enforce Advance Stop Lines	2
Need police officers on bikes on busy cycle routes	1
Stance of the Crown Prosecution Service	1
Changing the law for driver/cyclist collisions	1
Legislation needs to be clear to avoid confusing road users	1
Total	18

Need for greater enforcement

- 3.15 The most frequent comments relating to enforcement are those that state the need for greater enforcement generally, of both cyclists and non-cyclists.
- 3.16 Whilst these comments spoke of improved enforcement for infringements made by all road users, there were also a number of specific comments about enforcement, specifically:
- Enforcement of Advance Stop Lines (ASL), to ensure that they are used only by cyclists;
 - Enforcement of penalties handed to cars for parking in mandatory cycle lanes;
 - Enforcement of cyclist infringements, such as ignoring traffic signals.

The role of the police officer

- 3.17 Two of the comment categories focus on the role of the police officer in road enforcement. Three respondents suggested that police officers require greater training on legislation around cycling, to ensure more accurate enforcement of the law. One person went into further detail on police officers, suggesting that having officers on bicycles, monitoring busy cycle routes would help to reduce the number of accidents at these hotspots.

Stance of the Crown Prosecution Service

- 3.18 Another comment on the role of law enforcement bodies was for the Crown Prosecution Service to take a tougher stance on all cases involving cyclists.

Greater cyclist accountability

- 3.19 Relating back to the comments surrounding cyclist behaviour, there was a view amongst some respondents that there should be more accountability amongst cyclists.

Changing the law for driver/cyclist collisions

- 3.20 One suggestion was for a change in the law, so that when collisions occur between a car and a cyclist, the driver of the car automatically has liability for the collisions. The thinking behind this idea is that this would encourage car drivers to drive more carefully and more

considerately of cyclists if they knew that they will automatically be at fault in the event of a collision.

Comments on the Consultation

3.21 There were nine comments related to the consultation itself, with these then categorised into three sub-headings. These sub-headings were as follows:

Table 3.5: Comments relating to the Consultation

Comment/Suggestion	Number
Presentation of figures	4
Comments relating to specific actions	4
Suggestion for additional analysis	1
Total	9

Presentation of Figures

3.22 There were four comments (or queries) relating to the presentation of figures within the Action Plan, specifically Figure 2 (International cyclist fatalities per million population, 2012). The suggestion across these responses is to base the calculations on a per million cycle kilometres travelled basis rather than per million population, because this would then take into account the amount of cycling into this statistics. There was also a comment that the statistics for London should be presented as one, rather than split out, in order to be consistent with the other cities presented in that figure.

Comments relating to specific actions

3.23 There were also four direct comments relating to specific actions within the Action Plan. The comments related to Actions 1, 7, 8 and 16.

Action 1

Together with London boroughs, TfL will **deliver the major infrastructure programmes of the Mayor’s Vision for Cycling in London** emphasising the importance of cycle safety on the TLRN and borough roads. This includes implementing:

- at least 50 per cent of the Central London Grid by 2016 and Quietways, achieving a safe and connected network for cycling
- new Cycle Superhighways and upgrading the existing Cycle Superhighway routes
- three mini-Holland schemes in the London Boroughs of Enfield and Waltham Forest, and Royal Borough of Kingston upon Thames
- 33 Better Junctions to create a step-change in cycle and pedestrian safety at key junctions. Ten schemes will be delivered by 2016.

3.24 There was a suggestion of clarification of the first bullet point of this action – as it may not be clear whether this action means implementing 50 percent of the grid and 50 per cent of the Quietways, or implementing 50 per cent of the grid and all of the Quietways.

3.25 Also, the aspect relating to Cycle Superhighways is considered vague, on the basis that the Cycle Superhighways are not defined within the document, and current practice suggests that this action actually means "more blue paint to be used as a form of cycle infrastructure". If this is the case, the action should make this clear. If this is not the case, the action should make

clear what is considered a Cycle Superhighway and what is considered an upgraded Cycle Superhighway.

Action 7

For the first time, TfL will **publish planned and emergency diversion routes which take cyclists along the safest and most direct routes** when usual routes are unavailable, and will seek to keep routes open for cyclists unless space constraints or safety are compromised.

- 3.26 The comment on Action 7 relates to the text: "seek to keep routes open for cyclists unless space constraints or safety are compromised". The view of one respondent was that the action should state "unless motor traffic is slowed down".

Action 8

TfL, in conjunction with London Councils and London boroughs, will work to **deliver the Mayor's proposed Safer Lorry Scheme** to ensure that all HGVs entering London have appropriate safety measures fitted, to help better protect cyclists and pedestrians.

- 3.27 One respondent suggested an additional two points to this action, namely: The final text should include the two following actions:
- i. Replacement of the 'Cyclist Stay Back' stickers currently used on commercial and public transit vehicles in London with a new version that recognises the drivers equal responsibility to be aware of their own limited vision and the risks that they pose themselves to other road users. This should be developed in conjunction cyclist organisations (e.g. LCC) who have already suggested better versions.
 - ii. Monitoring and enforcement of the use of the stickers, so that vehicles that aren't HGVs, buses or trucks don't use them (for example, they shouldn't exist on taxis, minicabs and light goods vehicles because their visibility is not as constrained as that of HGVs, buses and trucks).

Action 16

TfL will **extend the safety principles of FORS by developing cycle safety initiatives for other operator sectors** such as buses, coaches, tour buses, taxis, private hire vehicles, light goods vehicles, cycle couriers and cyclists generally, encouraging drivers to be more sympathetic to vulnerable road user needs by:

- extending and adapting the Safe Urban Driving (SUD) training into the coach, taxi and private hire industries. Options to mandate this training, for example to all newly licensed taxi and private hire drivers, will be investigated
- lobbying the Driver & Vehicle Standards Agency (DVSA) to further emphasise cycle safety in the hazard perception in the driver theory test
- including key cycle safety messages in taxi and private hire trade papers and TfL licensee updates
- working with the taxi and private hire industry to ensure all Taxicard and Capital Call scheme drivers have undertaken vulnerable road user driver awareness training.

- 3.28 The suggestion from one respondent is that this action should apply to all existing vehicles, as well as new ones. Another respondent suggests that an additional commitment should be to "undertake further analysis of the common conflict types between buses and cyclists to inform training materials and safety messages for drivers".

Suggestion for additional analysis

- 3.29 There is one suggestion for additional analysis to be included as part of the action plan, specifically detailed analysis of the reasons for cycle KSIs, and in particular the proportion of cycle KSIs where the cyclist was at fault.

Comments on Cycling Policy

- 3.30 The sole comment relating to cycling policy (which was commented on three times) was that too much money is spent on cyclists.

4 Analysis of Stakeholder Responses

4.1 TfL received 27 key stakeholder responses in total. These responses were received through both the consultation portal and by email.

4.2 The key stakeholders who responded were:

- 20's Plenty for Us
- Action on Lorry Danger
- Alliance of British Drivers
- British Cycling
- Canary Wharf Group
- Chartered Institution of Highways and Transportation
- CTC
- Freight Transport Association
- London Assembly Liberal Democrat Group
- London Borough of Barnet
- London Borough of Bexley
- London Borough of Camden
- London Borough of Ealing
- London Borough of Enfield
- London Borough of Haringey
- London Borough of Islington
- London Borough of Wandsworth
- London Councils
- LoTAG
- London Fire and Emergency Planning Authority
- London TravelWatch
- Roadpeace
- Road Haulage Association
- Royal Borough of Greenwich
- Sustrans
- The Association of Bikeability Schemes
- Westminster City Council

4.3 Comments ranged from general points about the draft CSAP to specific points relating to actions outlined in the plan.

4.4 A summary of the key points raised by key stakeholders is detailed below:

20's Plenty for Us

- 4.5 20's Plenty for Us praised TfL for their commitment to and progress on cyclist safety.
- 4.6 They requested that the plan should be supplemented by a map which shows the actual locations of casualties which they said would illustrate the role of high streets and town centres as sources of cyclist danger.
- 4.7 They said that more should be done to implement and enforce lower speed limits both on borough roads and the TLRN and suggested a more ambitious programme of roll-out of 20mph limits across London.
- 4.8 They requested that TfL commits to the regulation of vehicle speeds where TfL has a duty of care.

Action on Lorry Danger

- 4.9 Action on Lorry Danger stated that they warmly support the draft CSAP and look forward to helping the Cycle Safety Working Group to review its implementation.
- 4.10 They submitted detailed comments relating to actions 8, 9, 10, 11, 14, 15, 18 and 21 as outlined in the draft plan.

Alliance of British Drivers

- 4.11 The Alliance of British Drivers suggested that the plan could contain further actions to improve cyclist behaviour and improve the overall standard of cycling in London.
- 4.12 The Alliance suggested that there is little evidence that Autonomous Emergency Braking Systems contributes towards road safety and therefore does not support the action to introduce Autonomous Emergency Braking Systems to new cars.

British Cycling

- 4.13 British Cycling stated that they welcome the publication of the draft CSAP and that the development of the plan will encourage other transport authorities across the country to follow TfL's leading approach – therefore it is vital that fundamental principles of the plan are coherent.
- 4.14 British Cycling stated that reducing Killed or Seriously Injured (KSI) cyclist numbers is vital and it is also important that activities that seek (and measure) to reduce the level of risk people are exposed to whilst cycling. They stressed that this is different to measuring cycling in terms of population.
- 4.15 They highlighted that they are pleased that many priorities identified in the draft CSAP also align with their manifesto 'Time to #ChooseCycling'.
- 4.16 British Cycling requested that TfL should aim to make cycling convenient and comfortable for the majority of the population. They also suggested that the draft CSAP should reference the Mayor's aspiration to increase cycling levels by 400% by 2026.
- 4.17 Finally, they provided detailed comments pertaining to some of the actions highlighted in the draft CSAP.

Canary Wharf Group

- 4.18 The Canary Wharf Group supported the strategy and the principles set out by the 32 key actions aimed at improving cycle safety.
- 4.19 They stated that TfL should focus on educating drivers and cyclists so that they take responsibility for their own safety.
- 4.20 They also stated that TfL should focus on improving key junctions to improve cycle safety rather than continuous routes. They also suggested that a TfL should be mindful of maintaining traffic capacity of key routes.

Chartered Institution of Highways and Transportation

- 4.21 The Chartered Institution of Highways and Transportation stated that they support the work that TfL is doing with regards to cycle safety.
- 4.22 They stated that the action plan should make reference to the health benefits that cycling provides.
- 4.23 The action plan showed international comparisons of KSI figures per million of population, rather than per mile cycled. The Chartered Institution of Highways and Transportation stated that these figures may misrepresent the actual risk to cyclists in London compared to other European cities.
- 4.24 They call for some additional analysis to be undertaken.

CTC

- 4.25 CTC welcomed the opportunity to comment on the draft CSAP and stated that they are pleased that earlier comments had been taken into consideration.
- 4.26 CTC requested that TfL reviews the KSI reduction target. They stated that a KSI reduction target that includes cycling and walking should consider the growing numbers of cyclists on the roads.
- 4.27 They provided detailed comments relating to specific actions throughout the draft CSAP.

Freight Transport Association

- 4.28 The FTA broadly supported the plan and stated that they particularly support the focus on education and awareness and the continuation of Operation Safeway, the HGV Industrial Task Force and Exchanging Places.
- 4.29 The FTA requested that TfL readdress the proposals for 20 mph. They believe that 20 mph zones play a factor in improving road safety but stated that they are not appropriate across the whole of the TLRN. They endorse 20 mph speed limits being used in a targeted way.
- 4.30 The FTA supported the plans to improve cycle infrastructure and to make London's roads safer for cyclists but suggested that these schemes should be designed in such a way that does not impact traffic flow or prevent kerbside access for deliveries.

London Assembly Liberal Democrat Group

- 4.31 The London Assembly Liberal Democrat Group stated that they are supportive of the plan and congratulated TfL on efforts to improve safety for cyclists.

- 4.32 They noted the disproportionate number of involvement of Heavy Goods Vehicles involved in cyclist fatalities and praised the work of the Industrial HGV Taskforce in targeting dangerous HGVs and of the Cycle Task Force working with cyclists and HGV drivers.
- 4.33 They stated that they were disappointed that the plan showed international comparisons of KS) figures per million of population, rather than per mile cycled. They felt that the suggestion that it three times more dangerous to cycle in Amsterdam than in London is inaccurate.

London Borough of Barnet

- 4.34 The London Borough of Barnet questioned the figures used in Figure 2 and suggested that the table may be misleading.
- 4.35 They submitted detailed comments relating to actions 2, 3, 4, 5, 6, 16, 21, 24, 25 and 32 as outlined in the draft plan.

London Borough of Bexley

- 4.36 London Borough of Bexley stated that the draft CSAP is extremely well researched and that important issues affecting the safety of cyclists on London's roads have been clearly identified within the plan.
- 4.37 They support the draft CSAP and all of the proposed actions set out in the plan.

London Borough of Camden

- 4.38 The London Borough of Camden welcomed the draft plan and stated that the Borough is committed to improving conditions for cyclists.
- 4.39 They stated that they are keen to work with TfL to reduce the rising numbers of KSIs in London.
- 4.40 They submitted detailed comments about the draft CSAP specifically relating to matters of context, targets, data, speed, taxis, HGVs, work related risk, enforcement, designing safe streets and perceptions of safety.

London Borough of Ealing

- 4.41 London Borough of Ealing provided detailed comments relating to specific actions within CSAP and well as comments about the style and layout of the document.

London Borough of Enfield

- 4.42 The London Borough of Enfield stated that they support the actions and policies set out in the draft CSAP however, requested that a road danger reduction approach is embedded more comprehensively within the strategy and the action plan.
- 4.43 They provided detailed comments relating to specific actions within the draft CSAP.

London Borough of Haringey

- 4.44 The London Borough of Haringey submitted detailed comments relating to actions 1, 4, 5, 12, 13, 17, 24, 25, and 30 as outlined in the draft plan.

London Borough of Islington

- 4.45 The London Borough of Islington welcomed the consultation on the draft CSAP and stressed the need to dedicate resources to address the safety of the growing number of cyclists on London's roads.
- 4.46 They submitted detailed comments relating to actions 1, 4, 5, 6, 8, 15, 18, 23, 24, 25, 26 and 31 as outlined in the draft plan.

London Borough of Wandsworth

- 4.47 London Borough of Wandsworth stated that they broadly welcomed the plans.
- 4.48 They questioned the figures used in figure 2 and suggested that the table may be misleading.
- 4.49 They stated that safe streets should be designed for all road users and that the draft plan should provide more detail on advanced cyclist signals.
- 4.50 They submitted detailed comments relating to actions 24 and 25.

London Councils

- 4.51 London Councils welcomed the ambition to improve cycle safety and the broad range of initiatives set out in the plan. In particular, London boroughs welcome the focus on improving safety of cyclists and HGVs through the Safer Lorries Scheme.
- 4.52 They stated that the plan should include more actions targeted to other road users, especially for cars which make up the majority of cyclists killed or seriously injured.
- 4.53 They also put forward some further suggestions that they requested that TfL should consider and also provided detailed comments on various aspects of the draft CSAP.

LoTAG

- 4.54 LoTAG requested that TfL develop measures to that ensure that BAME communities are not at a higher risk when cycling. They stated that this is especially important if Boroughs are trying to increase the number of people from BAME communities cycling.
- 4.55 They requested more information on contributory factors involved with cyclist's collisions with taxis, buses, coaches and motorcyclists.
- 4.56 They submitted detailed comments relating to actions 2, 5, 8, 12, 23, 25, 26 and 30 as outlined in the draft plan.

London Fire and Emergency Planning Authority

- 4.57 The London Fire Brigade welcomed the draft CSAP.
- 4.58 They questioned whether 'Safe Drive Stay Alive' should include an element of awareness raising about the dangers to cyclists.

London TravelWatch

- 4.59 London TravelWatch stated that the draft CSAP contained a good balance of measures and that proposed interventions are data and evidence-led. They supported the reduction of road speeds and the 'Share the Road' campaign.
- 4.60 They stated that reducing demand for roads through roads pricing would make it safer for cyclists.

- 4.61 They stated that consideration needs to be given for different provision for cycles across the city with the aim of making it understandable and safe for cyclists.

Roadpeace

- 4.62 Roadpeace welcomed the draft CSAP. They stated that they believe that road speed reduction will lead to a reduction of injuries.
- 4.63 They stated that lorry safety should be covered in a standalone plan and that a harm reduction approach is required.
- 4.64 They submitted detailed comments relating to actions 8, 9, 10, 11, 14, 15, 18 and 21 as outlined in the draft plan.

Road Haulage Association

- 4.65 The Road Haulage Association states that both the haulage industry and cyclists are responsible for behaving in a way that maximises their own and each other's safety.
- 4.66 They submitted detailed comments relating to actions 19 and 21 as outlined in the draft plan.

Royal Borough of Greenwich

- 4.67 Royal Borough of Greenwich requested that documents like CSAP is shared with Boroughs for initial feedback prior to consultation.
- 4.68 They provided detailed comments relating to specific actions within the draft CSAP.

Sustrans

- 4.69 Sustrans welcomed the consultation on the draft CSAP.
- 4.70 They stated that the plan lacked clarity on the actions' intended impacts and how they will be monitored. They stated that the plan should include an indication of what outcomes will constitute success and felt this would give a clearer structure to both guide and evaluate its delivery.
- 4.71 They suggested that a full mid-term review is conducted and/or an independent evaluation is commissioned.
- 4.72 Sustrans stated that while the casualty reduction target is useful, they felt that a greater measure of the success of the plan will be reflected in cycling becoming more demographically representative of London's population over the next six years.
- 4.73 They also provided detailed comments relating to specific actions within the draft CSAP.

The Association of Bikeability Schemes

- 4.74 The Association of Bikeability Schemes stated that it is right that safety is at the heart of the draft CSAP. They state that cycling promotion should also be explicitly stated from the outset. Furthermore they felt that the promotion of active travel should be included in the 6 road safety commitments and a target for increasing trips by bike should be included.
- 4.75 They stated that there is a strong requirement for an action plan which sets out how to reduce driver harm.
- 4.76 They provided detailed comments relating to specific actions within the draft CSAP.

Westminster City Council

- 4.77 Westminster City Council welcomed the draft CSAP and stated that the plan is suitably ambitious but also realistic in terms of deliverability.
- 4.78 The Council requested that the plan highlights what role boroughs might play in helping to deliver each of the proposed actions in the plan.
- 4.79 The Council stated that the Figure 2 which shows that it three times more dangerous to cycle in Amsterdam than in London is misleading in their view.
- 4.80 The Council provided detailed comments relating to specific actions within the draft CSAP.

Control Sheet

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