







DfT Cycling Delivery Plan

Joint submission from the Chartered Institution of Highways and Transportation (CIHT), the Institution of Civil Engineers (ICE), The Chartered Institute of Logistics and Transport (CILT) and The Institute of Highway Engineers (IHE).

The four professional bodies have agreed to collaborate in highlighting the need to address cycling issues.

We welcome the publication of the draft Cycling Delivery Plan and the opportunity to provide comment. As professional bodies our members have a diverse range of disciplines across the field of highways and transportation and we are well placed to offer comment on the Plan and provide the offer to collaborate with the Department and others on the development and delivery of the Cycling Delivery Plan.

Both cycling and walking have an important role to play in reducing pressure on road space and improving health through physical activity, whilst making city environments and public spaces better places to live.

The needs of cycle users and pedestrians, particularly in terms of providing comprehensive, comfortable, safe and attractive routes and how traffic management can best be adapted to accommodate them, is of increasing importance.

The range of issues involved is complex, but their resolution is at the heart of allowing all users of our highway and transport networks to make more effective and safer travel choices.

Key Points:

- We note that the plan addresses walking as well as cycling in terms of actions, however
 if this is to be done properly, the needs of pedestrians and other road users must be
 addressed fully and consistently. It is important to note that cycling and walking are
 two very different modes of transport with very different user needs.
- As this document explicitly addresses both modes it is not appropriate for the plan to be entitled 'Cycling Delivery Plan'. On this basis the title should include walking and that the text is consistent and explicit throughout about the needs and actions of these two distinct modes.
- The Delivery Plan needs to be clear on the relationship between national and local government and the roles they play in delivery of the plan.
- Certainty, continuity and clarity of funding, both revenue and capital, is essential to the success of the plan.
- The development of a consistent set of standards and guidance on walking and cycling is required to assist local authorities.
- Clear objectives and targets are required with relevant outcome measures to show their impact. The draft Plan has no outcome measures as it stands.
- A ten year plan should be seen as a minimum required to drive effective change.

Specific comments on the sections of the Plan and associated annex A

Introduction

- We welcome the publication of the Value for Money Assessment for the Local Sustainable Transport Fund; Claiming the Health Dividend & Value for Money Assessment for Cycling Grants.
- The draft plan states, the benefits are wide ranging to the economy, environment and health of individuals. These three benefits are intrinsically linked. For example, it is estimated that if people in urban areas of England and Wales cycled and walked as much as people in Copenhagen, the NHS could save around £17 billion within 20 years¹. The Cabinet Office/Mayor of London report 'Moving More, Living More's estimates that the direct and indirect costs of inactivity in the UK totals £20bn a year.
- The goal of 'rivalling' the cycling levels of those in Denmark, the Netherlands and Germany is admirable and desirable, however it is worth remembering that the levels attained in Denmark and the Netherlands is a result of decades of policy and investment. A ten year plan is a good start, but the ten year plan should be seen as the initial period of sustained attention and more will be required if it is going to bring us closer to the levels of cycling in these countries.
- We welcome the plans for a biennial review of progress.

Theme 1 – Vision, leadership and ambition

- The Institutions support the view that strong leadership is needed to deliver the cycling vision and actions at both the national and local level with the engagement and commitment of Local Enterprise Partnerships (LEPs). However, the Delivery Plan is light on how this will be achieved – there are no concrete proposals of who has ultimate ownership to ensure delivery. This concept is also relevant to walking.
- The successful implementation of the Cycling and Walking Delivery Plan requires cross departmental co-operation, co-ordination and buy in with regards to policy and funding streams, including the Department for Transport, Department of Health, Department of Communities and Local Government, Treasury, Department for Education, Department of Energy & Climate Change, and Department for Environment, Food and Rural Affairs.
- We note the devolution of decision making in critical transport matters to city regions.
 Greater Manchester, for example is to receive more powers in relation to trains and
 buses, and it is in discussion about the strategic road network. As two other important
 modes, particularly in congested urban situations, cycling and walking need to feature
 prominently in discussions about transport decision making, investment and
 management in city regions.
- Engagement with Public Health England, as public health is now the responsibility of local government, is critical as this gives a great opportunity to link health benefits of walking and cycling to the investment required to increase levels. The PHE Report 'Everybody Active, Every Day'³ (October 2014) provides the basis for an evidencebased approach to implementation of effective cycling and walking investment.
- The forming of partnerships is a good idea, however we have reservations with the limitations of "expressions of interest from local authorities who would be interested in forming this partnership with government". This could leave large parts of the country

¹ Jarret et al 2012

² Moving More, Living More

³ Everybody Active, Every Day

without the necessary commitment to cycling and walking. A requirement on authorities to commit to enabling an increase through providing better infrastructure is needed. The Government's City Deals agreement would be a good template to begin the process. We would also recommend that government closely monitors the progress of the Active Travel Wales Act4 and its associated guidance, where there is a statutory onus on the local authority.

- The Delivery Plan places an emphasis on local authorities to deliver these plans, but many are facing increasing reductions in revenue resource. This leads to a lack of staff resources and the expertise to develop delivery plans. There needs to be a firm commitment from central government for additional capital and revenue support that will be required by local authorities to deliver the plan.
- We welcome the "ambition" of achieving 55% of children walking to school however believe this should be a target. This is an example of where improvements in communication between departments (e.g. DfT and Education) and ultimately local schools is vital. There should also be a more comprehensive set of targets, addressing walking across the population as a whole, given the value and benefit of, for example, keeping the increasing older population active.
- There needs to be a further commitment to greater integration with public transport.
 Provision for cycle parking at stations is mentioned, however more is required, including greater liaison/working partnership with public transport operators, for example, there are implications for rolling stock.
- The Institutions recognise the value and importance of the Active Travel Consortium, however we would suggest that this body would benefit from the engineering, transport planning and planning expertise that can be provided by professional bodies. We recommend that the Cycle Proofing Working Group could become a focal point for this, but it needs to be provided with the remit and the authority to provide the direction that is needed.

Theme 2 - Funding

- Increased funding for cycling is described as an "aspiration". This is inadequate. A firm commitment is required and new funding streams need to be identified for both walking and cycling. In addition, it should be clear what the nature of the new funding streams might be, their size and their sources. For example, The Department should assess the City of Edinburgh Council5 budgetary commitment to cycling. Starting with a minimum of 5% in 2012/13 the Council committed, from its base highways and transportation budget, to raising the budget 1% each year for cycling.
- As suggested above there is a requirement for a mix of revenue and capital funding.
 Certainty and continuity of funding, as in the government's proposals for the Strategic Road Network, is essential if the plan is to be delivered.
- Maintenance The general state of the UKs highways is poor. According to the RAC's
 Driving Abroad Report6 the UK is currently ranked 24th in the world for the quality of
 its highways and byways. Walking and cycling improvements can be carried out as
 part of the capital maintenance programme. For example, when resurfacing
 opportunities arise, cycling and walking provision should also be considered at the
 same time.

⁴ Active Travel Wales Act

⁵ City of Edinburgh Council

⁶ RAC Driving Abroad

- Consideration needs to be given to how we maintain cycle lanes and footways. These may currently be maintained to a different standard compared to the carriageway, but cycle routes and footpaths must be maintained if year-round walking and cycling is to be enabled. For example, sweeping hedge cuttings with thorns, sweeping and de-icing footpaths and cycle lanes that are kerb segregated from motor vehicles and different intervention levels for potholes and ponding. The Highways Maintenance Efficiency Programme (HMEP) should consider how cycling and walking are addressed during maintenance activities. Good maintenance of the Local Road Network with robust Asset Management Plans, including footpaths, is vital for cycling and walking.
- The UK Roads Liaison Group, which brings together national and local government from across the UK should be encouraged to ensure that the needs of the cyclist and pedestrian are given due consideration within their Codes of Practice7 which are currently under review.
- Suggested funding in this section appears to be targeted at cycling. The £10 per person is a minimum funding packet aimed at cycling. The Delivery Plan requires a financial commitment to walking.
- The Government is devolving more power and funding to LEPs, recent analysis by the Campaign for Better Transport8 suggests that LEPs need to change the focus of their funding towards walking and cycling schemes, if the £10 per head target is to be achieved. Expectations of the LEPs in this regard need to be outlined.
- We note that LSTF funding will be ending in March 2015, with a lower level of funding continuing for some areas until March 2016. The investment in LSTF has provided vital revenue funding for sustainable transport schemes. This brings into very sharp focus the need to guide LEPs to invest in cycling and walking schemes.
- Investment brings a wide range of economic, health and environmental benefits. The
 Delivery Plan would benefit from more facts and figures. The Delivery Plan should
 reference the recently published DfT report 'Claiming the Health Dividend' by Dr Adrian
 Davis to help make the case for investment in walking and cycling. The Plan should
 also reference reports such as the recently published British Cycling report 'Benefits
 of Investing in Cycling'9 and Living Streets 'Making the Case for Investment in the
 Walking Environment10.
- The government and local authorities can support evaluations of walking and cycling projects by recognising the full range of economic benefits arising from such projects by using tools such as WebTAG and the World Health Organisation's HEAT.

Theme 3 - Infrastructure & Planning

• The range of issues involved in terms of infrastructure planning and street design for walking and cycling is complex and careful consideration should be given, as, when this is done badly, they can end up as conflicting modes – the development of a cycle scheme does not automatically benefit pedestrians. The Institutions are not aware of an evidence base that highlights that "considering cyclists at the design stage of new and improved road infrastructure, in turn benefits pedestrians too". We welcome the recently published Planning Practice Guidance document 'Transport evidence bases in plan making'11.

⁷ Codes of Practice

⁸ Local road plans, LEPs and road-building

Benefits of Investing in Cycling

Making the Case for Investment in the Walking Environment

¹¹ Transport evidence bases in plan making

Paragraph 3.2 - 3rd bullet serves to highlight the complexities involved – "Ensuring that professionals understand how to improve cyclist provision whilst <u>considering</u> the needs and safety of other highway users not least pedestrians and people with specific needs"

- More research is required into what does and does not work there is limited knowledge and research about how pedestrians, cyclists and vehicle users behave and react the way they do.
- The UK is facing some big societal changes including the ageing population and a rise
 in obesity and social exclusion, so the provision of walking is essential, and will help
 tackle dementia, disability and frailty in later life, subsequently helping reduce demands
 on the NHS.
- The Delivery Plan would benefit from a more concise and specific statement on what "cycling proofing" is with a relevant statement for walking as well.
- The Institutions have a key role in the development of best practice and the delivery of professional qualifications and training. CIHT have recently launched 'Planning for Cycling'12 guidance, and would be keen to engage with government and other professional institutions to ensure the improved provision of planning and infrastructure for walking and cycling. IHE have established a Professional Certificate in Cycling Infrastructure Planning & Design as a means for highways practitioners to demonstrate their competence in planning and delivering cycling projects.
- The Delivery Plan makes reference to creating a single point of information about best practice for creating and designing cycle-friendly streets and shared space. There is a range of best practice advice already available for walking and cycling. The recently produced Transport for London (TfL) design standards, the Active Travel Wales Design guidance, Manual for Streets, and the Cycling for England library and other relevant material is available on the Hub resource13 managed by CILT UK and publicly available free of charge.
- Cycle proofing standards There are a number of standards for the highway network, including DMRB for trunk and motorway roads, London Cycling Design Standards (Draft), Sustrans, and the Road Safety Audit. These need to be agreed as a consistent set of standards that are available to local authorities possibly a cycle proofing inspection standard that is mandatory. A common standard for walking is also required, the Wales Active Travel Act and its associated design standard covers both walking and cycling. Government in conjunction with Institutions and others, need to provide clarification on what the standards are and consider what requires updating in line for example with the new TSRGD. The professional Institutions are in an ideal position to discuss the most appropriate location for that advice and how that is adequately maintained.
- We welcome the 6 month review of planning issues in relation to cycle and pedestrian proofing and would be very pleased to have the opportunity to offer their expertise and assistance in the review of planning issues. Within this process it will be very important to have other Departments' involvement, especially DCLG. We consider the current planning guidance is insufficient to help deliver the cycling and walking networks desired by the Delivery Plan. Local plans and decisions on individual planning applications need to ensure that walking and cycling have been taken into account and Guidance should make this explicit. Local plans should indicate where to develop housing, business and sustainable communities and be required to be clearer, and

¹² Planning for Cycling

¹³ CILT <u>Hub Resource</u>

more specific on the integration of transport. This then needs following through to determination of planning applications, The planning system should:

- Choose the right place for development in order to reduce the need to travel and maximise sustainable travel modes.
- Ensure the most sustainable patterns of development.
- o Give priority to walking, cycling and should include public transport.
- o Ensure the transport implications of other policy areas are considered, for example health and education.
- Contribute towards reducing transport emissions and moving towards a low carbon economy.
- Adequately enforce relevant planning conditions relating to cycling & walking infrastructure and travel planning.

Theme 4 - Safety and perceptions of Safety

The range of issues involved is complex, but their resolution is at the heart of allowing all users of our highway and transport networks to make more effective and safer travel choices.

- The Delivery Plan needs to recognise that cycling and walking should not typically be so designed as to share the same space, unless as part of an overall scheme where space is shared amongst all users.
- The Government should consider and recognise the different casualty rates on different classes of road and on roads with different speed limits. Strategic Road Network improvements are important, a lack of walking and cycling provision on, or across trunk roads is a real barrier to movement and therefore participation. The recent focus of the Highways Agency in this area is a welcome move.
- We welcome the action to develop a series of behaviour change projects to promote cycling and walking as a normal, accessible activity available to all.

However:

- This theme focuses on casualties linked to cycling but also needs to address pedestrian casualties and how the delivery plan will address these. The Stepping Out14 report highlights the issues.
- Cycling and walking to school and work schemes should be encouraged, expanded and simplified. There is no reference to Living Streets successful Walk to School 15programme. We also understand that the Department of Education is working on a yet unpublished home to school travel and transport guidance.
- The Delivery Plan states the government will "endeavour to continue funding Bikeabilty training post 2015/16". We would like to see a commitment to continued funding.
 - Level 2 Bikeability is essential to help build up a genuine increase in cycling to continue the process of long-term behaviour change, keeping young generations on their bikes.
 - Level 3 Bikeability needs rebranding so that adults are encouraged.
- Further barriers to cycling to schools includes the lack of provision of facilities at the school required to encourage participation including lockers and proper bike storage facilities.
- Barriers to walking in many areas includes a lack of footpaths and safe crossings.
- The Delivery Plan does not mention vehicles, especially HGV/PSV safety. TfL has carried out a project aimed at reducing the risk of collisions between vulnerable road

¹⁴ Stepping Out

¹⁵ Living Streets Walk to School

users and construction vehicles, led by the construction logistics industry, CLOCs¹⁶, which should be supported so that it can be rolled out nationally as is planned with FORS¹⁷.

- The Delivery Plan does not address cycling within the driving test, for both cars and truck/PSV operators.
- There is currently no requirement on collision reporting between pedestrians and cyclists making it very difficult to monitor and evaluate.

Governance and monitoring

- The Institutions welcome and recognise the importance of the cross-government nature of the Delivery Plan. It is vital that all relevant stakeholders are fully engaged with the process in the future.
- We welcome the regular monitoring of the Delivery Plan and believe the biennial update on actions is key.
- The Delivery Plan states that relevant "outcome measures" will show the impact of these actions, however there are no outcome measures mentioned in the plan.

In conclusion, the professional Institutions represented in this response welcome the draft Cycling Delivery Plan and recognise the complex range of issues that will need to be addressed, as highlighted above, to ensure its successful delivery. We look forward to working with government and local authorities in helping with the successful delivery of the Cycling and Walking Delivery Plan.

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¹⁶ CLOCS

¹⁷ FORS