

Consultation on Department for Transport's draft Cycling and Walking Investment Strategy ~ Response from Campaign for Better Transport

May 2016

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

As part of the coalition of health and transport groups that called for inclusion of a Cycling and Walking Investment Strategy (CWIS) in the 2015 Infrastructure Act, we naturally welcome this strategy.

We welcome the headline messages on the social, health and environmental benefits of walking and cycling and the aspiration that "cycling and walking should become the natural choice for shorter journeys or as part of a longer journey" with a focus on safety, mobility, and better-designed streets.

We agree with the sentiment that promoting cycling and walking is a proper goal for public policy and an appropriate use of public funds: as the CWIS states, "building active travel, including walking and cycling, into everyday life can help achieve win-wins for health, the economy and the wider environment."

However in general, the CWIS is short on hard targets and even shorter on funds. The goal to double cycling activity by 2025 is a direction we support, but lacks ambition. Pro-cycling policies in London saw a 12% increase in cycling in a single year projected by Transport for London, prior to the completion of the cycle super highways¹: outside London we believe greater increases are possible given a relatively low starting base. We therefore call for more a more ambitious 2025 cycling target and clear interim targets. We call for a similar quantifiable target for walking, with an earmarked budget to support this. There is a wealth of good practice available as reported in the CWIS: what is now required is the funding and focus to roll this out nationwide.

Overall the level of specific funding earmarked for walking and cycling is disappointingly low and shows a disconnect between policy and delivery. Lack of funding risks undermining the CWIS and will not inspire other agencies to make the changes needed to deliver the CWIS. Looking to other funding streams without firm guidance and an element of ring-fencing is likely to prove unreliable: as the draft CWIS notes, of £12bn in the Local Growth Fund, a mere £600m has so far found its way to cycling and walking.

We also want to see joined-up action across the Department for Transport and other departments to take action which will promote cycling and walking. Air pollution and danger from HGVs remain major challenges to safer walking and cycling and we are concerned that other policy initiatives may undermine progress on these. Building new roads in urban areas rather than increasing provision for sustainable modes, and introducing longer HGVs on UK roads rather than enforcing safer HGV operation, are two major areas we would like to see reviewed if the stated commitment to walking and cycling is to be delivered in practice.

1. The government would be interested to hear views on the approach and actions set out in section 8 of this strategy

Better Safety

We welcome the aim of improving the safety and reliability of walking and cycling journeys. The interventions proposed in section 8.10-8.15 of the CWIS cover best practice in safety design and cycle training.

¹ [Cycling in London now highest since records began](#) (TfL, 2015)

However, they do not address the wider picture of safety issues affecting people walking and cycling.

Walking and cycling are not intrinsically dangerous activities, nor is the behaviour of walkers and cyclists their main risk. The danger comes from external environmental factors to which people are exposed while walking and cycling and which must be addressed for the CWIS to be a success.

Air pollution is currently at illegally dangerous levels, with emissions from diesel vehicles the main offender. Enabling and encouraging clean air zones, low emission zones and other vehicle restrictions by local authorities is a vital step to providing a safer and more attractive environment for walking and cycling.

HGVs are five times more likely than cars to be involved in fatal crashes on local roads. We support moves to ban HGVs which do not comply with the safest all round visibility designs. We are extremely concerned by current DfT trials of longer HGVs: if continued these would increase the maximum length of HGVs by 2.05m, allowing lorries up to 18.55m on UK roads.² The risks to cyclists and pedestrians posed by the increased tail swing and blind spots from longer lorries would clearly be counter to the CWIS and we urge the Government to reconsider this dangerous step.

More generally, we believe that there is a need to manage the movement of larger lorries in urban areas and on local roads, so as to reduce the likelihood of conflict with vulnerable road users. Consolidation centres, freight access schemes and schemes like the Freight Operator Recognition Scheme in London need to be more generally promoted by the Government.

Potholes caused by poor road maintenance pose a particular risk to cyclists and make conditions unpleasant for pedestrians. The £250M Pothole Action Fund is welcome, but does not address the £12bn backlog in local roads repairs, on the roads most used for cycling and walking. A proportion of the proposed Roads Fund from ring-fenced VED devolved to local highways authorities, including Transport for London, earmarked directly for delivery of the CWIS as well as to assist with road maintenance and improvement beyond the Strategic Road Network,

Driver behaviour is also a factor. The Department should work with the police and local authorities to ensure enforcement of the Highway Code including rule 170 on pedestrian priority at junctions, and in addition, to ensure all crossings meet the 2005 DfT standard for the minimum time that should be granted to pedestrians when crossing the road at a traffic signal, and meet the 1995 DfT standard for blind and visually impaired people.

Better Mobility

Walking and cycling are as important as connectivity forming part of longer journeys, as they are for shorter single mode journeys.

We agree that “ensuring a seamless transition from public transport to and from walking and cycling routes and networks is key to increasing the number of walking and cycling stages to train stations and other transport interchanges”. Good quality signage and wayfinding schemes such as Fixing the Link (Colchester) provide examples of best practice.³

The range of interventions in 8.16-8.32 is very wide ranging, embracing behaviour change to encourage modal shift as well as design and provision of facilities, and includes many valuable projects. However overall it has a rather piecemeal feel.

To achieve real integration of walking and cycling into everyday mobility will require these schemes to be underpinned by some clear cross-cutting policies such as a duty to prioritise walking and cycling in planning new developments, as set out in our response to question 5 below.

To support everyday walking and cycling, the proposed guidance should cover providing walking and cycling routes in line with desire lines, connecting key destinations including transport hubs, schools, and hospitals, and assisting public services and employers with adopting active travel plans, as well as providing infrastructure such as bicycle parking at commuter stations and provision for bikes on trains on tourist routes.

Other policies to encourage modal shift include support for local authorities in:

² [New longer lorries pose a significant road safety threat and should be restricted, say transport experts](#) (2016)

³ [Fixing the Link](#) (Campaign for Better Transport, 2013)

- the adoption of a workplace parking levy
- provision of best practice guidelines and training for transport professionals
- provision of segregated cycling lanes
- extension of public cycle hire schemes
- provision of green pedestrian and cycling bridges to counter the severance effect of major roads
- controls on pavement parking
- traffic-free days so that people can take ownership of their streets
- looking to pedestrianise more streets across the country.

Better Streets

We applaud the aim of seeing streets as “civilised places where people come first” and commend the approach set out in the Manual for Streets. We look forward to see this approach taken forward in other policies such as Highways England’s forthcoming Accessibility Strategy, and updated design guidance for walking and cycling provision on major roads, building on the work of the Cycle Proofing Working Group.

The interventions proposed in sections 8.33-8.42 are sound contributions to future design, however there is also a need to retrofit existing town centres to make them more walking and cycling friendly.

We welcome plans to explore 20mph zones and support calls for a 20mph default limit in residential areas. While 20mph zones have primarily been seen in urban areas, rural communities could also benefit, particularly those which do not have pavements or streetlights. This would also bring wider benefits of mitigating noise and vibration from high volumes and speed of traffic through residential neighbourhoods.

For 20mph roads to be relied on as a safe space for walking and cycling, particularly for children, adult novices and the elderly, more priority needs to be given to enforcement of the speed limits and appropriate guidance to police and magistrates that breaching such limits is seen as a serious offence.

2. The government would be interested to hear views on the potential roles of national government departments, local government, other public bodies, businesses and the voluntary sector in delivering the strategy and what arrangements could best support partnership working between them

We note and welcome the proposal for an expert body to monitor and advise on the strategy, and would be happy to contribute to this.

We feel the strategy also needs a DfT Board level champion, with a specific remit for active modes. There is a role for such a champion in other departments (for example Health) and for inter-departmental liaison with teeth to ensure that each agency plays its part in delivering the strategy.

At local level, we note that LEPs do not have a strong track record of prioritising cycling & walking: nor are their decisions transparent or democratically accountable.

Effective delivery of the CWIS at local level is best-served by giving local authorities responsibility for owning and scrutinising the strategy’s implementation, perhaps through Health & Wellbeing Boards with suitable representation from active travel advocacy groups. The excellent guidance in the recent Public Health England publication *Working Together to Promote Active Travel A briefing for local authorities*⁴ would contribute to this.

For businesses and employers, we would propose a “National Cycling & Walking Partnership” that could provide targeted funds and guidance direct to those organisations embracing the walking and cycling targets, to complement locally-led initiatives, and contribute examples of best practice for wider sharing.

More attention needs to be given to mainstreaming cycling and walking in other DfT and Government programmes and spending, for example in rail franchising, the new bus franchising and partnerships and roads investment.

⁴ [Working Together to Promote Active Travel A briefing for local authorities](#) (Public Health England, 2016)

3. The government would be interested to hear suggestions and evidence of innovative projects and programmes which could be developed to deliver the objectives outlined in Section 4 (objectives & targets)

It is good to see a number of positive examples cited in the CWIS including the Cambridge Guided Busway. This is a good example of a corridor-planning approach where a bicycle route has been provided alongside the busway. This has been heavily used and there is some NHS research showing it has led to a shift toward active travel.

In addition, we commend the following:

- Fixing the Link. This is a project developed in partnership with Abellio as the local rail operator and local authorities in east Anglia, and implemented in Colchester, with a well-signposted walking route from the main railway station to the town centre.
- Mini Holland schemes. The London pilots of mini-Holland schemes have shown how existing centres can be redesigned to be more walking- and cycling-friendly.
- London Cycle Superhighways. In particular, new routes on Blackfriars Bridge, CS5 across Vauxhall Bridge to Oval and CS2 at Whitechapel with floating bus stops and two stage turns. These new cycle superhighways have been widely welcomed as an example of good practice and are already proving very popular.
- Nottingham's Workplace Parking Levy. This has incentivised employers and commuters to adopt more sustainable travel plans and has provided funds for improvements to both public transport and walking & cycling facilities.
- Zero Emissions Network (ZEN): this is a joint initiative between the London boroughs of Islington, Hackney and Tower Hamlets aimed at local businesses which, among other strands, provides free cycle training in the workplace and grants for facilities such as bicycle parking, lockers and showers.
- Walkit.com is one example of an online mapping tool that makes it easier to find the best walking routes around towns across the UK.⁵ Providing guidance to all local authorities to provide prominent and easy access to similar tools through local authority websites would be a useful step.
- Brighton has introduced segregated lanes along Old Shoreham Rd, similar to Danish provision. The Lewes Road corridor in Brighton, with floating bus stops, advance cycle release at traffic lights and wider lanes, although no physical segregation, has seen an increase in both bus and cycle use.
- Floating bus stops have also been introduced in Manchester helping to reduce conflict between buses and cycles.
- In Cambridge, Hills Rd and Huntingdon Rd, in Bournemouth, Castle Lane and in Leicester, Newark Street, are all good examples of best practice in the UK.

There are also many regrettable examples of poor practice in the field which it is important are not replicated in future. Funding for cycle facilities should be conditional on compliance with best practice in terms of quality design. This need not be expensive or over engineered – for example, planters are a simple way to mark out new cycle routes on a temporary basis – but should ensure cyclists have adequate safe space and clear sightlines.

It may be appropriate to earmark some CWIS funding for exemplary retro-fitting of improvements to existing walking and cycle infrastructure, for example programmes to review and remove obstacles from existing routes, to provide adequate width of paths or lanes, give priority over junctions, provide segregated facilities, or to improve lighting and signage.

4. The government would be interested to hear your views on how to increase cycling and walking in typically under-represented groups (for example women, older people, or those from black, Asian or minority ethnic backgrounds)

It is important to consult directly with under-represented groups, to have a diverse team engaged in design and delivery of the strategy and to follow the 'nothing about us, without us' principle.

There are some approaches we believe could be beneficial in breaking barriers to participation:

⁵ Walkit website <http://walkit.com/about/>

- Integrating walking and cycling with everyday life: for example, running cycle taster sessions at shopping centres, supporting school and workplace travel plans, integrating history and nature walks into the school curriculum
- Delivering cycling and walking activities through other agencies: for example, supporting employers with green travel plans and workplace parking levies, encouraging 'exercise prescriptions' and health walks through the NHS.
- Having a low threshold to making a change: for example extending public bike hire schemes on the London model to other centres, providing enhanced walking and cycling facilities along 'desire line' routes
- Social infrastructure: positive images in promoting cycling and walking, identifying diverse role models and providing support for peer leaders in communities.

There is considerable expertise in the public health and sports sectors from promoting active lifestyles which can be drawn on to promote walking and cycling.

While specific interventions may benefit particular groups, we believe that overall investment in providing safer and more accessible walking and cycling, and having policies that incentivise active travel ahead of other modes, will be the best and most effective way to increase participation among all sections of society.

5. The government would be interested to hear views on what type of assistance Local Authorities and Local Enterprise Partnerships would find beneficial to support development of ambitious and high standard Local Cycling and Walking Infrastructure Plans

If the Government is to match its aspirations in practice, it will need to ensure wide sharing of best practice and monitor delivery across the country. We welcome proposals to provide guidance to local bodies on developing Local Cycling and Walking Infrastructure Plans (LCWIPs).

Better local accountability

However we note that some delivery is anticipated to be through LEPs (Local Enterprise Partnerships) which is cause for concern. We acknowledge the good work of the Sustainable Transport Delivery Excellence programme advising LEPs on how to deliver good quality sustainable transport projects: however, there is nothing in the CWIS that obliges LEPs to increase the proportion of spend, or the total number of projects, dedicated to improving cycling and walking.

As the draft CWIS notes, of £12bn in the Local Growth Fund, a mere £600m has so far found its way to cycling and walking. The draft CWIS talks about "building capability and understanding": however on past performance this will be insufficient to get LEPs to play their part in delivering the CWIS. Our LEP Watch analysis of the 2015 data shows that LEPs continue to prioritise roads at the expense of sustainable modes, with over 50% of project spend allocated for new road capacity. Sustainable modes (public transport and active travel) add up to around a third, while cycling gets the smallest slice of spend, attracting just 1% of the allocated funds.⁶ All too often the wider economic and social benefits of promoting active travel are not considered or underplayed, in contrast to the priority given to relatively small time savings for private and commercial vehicles.

Funding must not only be allocated but also delivered. Guidance should be given to LEPs, local authorities and other partners that a doubling of the funds allocated to walking and cycling provision is a minimum requirement. This could be further incentivised by keeping a proportion of the national transport budget for match funding exemplary schemes. Local authorities should not only have guidance in developing LCWIPs but also in holding local partners to account for their delivery.

Strengthening policy frameworks

There is also an important role for other agencies across the public, private and community sectors in making the vision set out in the CWIS a reality on the ground: we welcome the recognition of this in the CWIS but feel there are areas where this could be strengthened.

⁶ [LEP Watch: our work to change local transport spending priorities](#) (Campaign for Better Transport, 2016)

For example, the CWIS recognises the importance of planning policy and the goal within the National Planning Policy Framework that “planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling”.

However in too many cases, planning policy is delivering the opposite: the acknowledged need for large numbers of new homes is producing a new wave of edge of town estates, designed around car dependency. This damages the environment, makes poor use of scarce housing land for vehicle storage, fosters unhealthy lifestyles and excludes non-motorists from social and economic activity. Positive alternatives are set out in our report “Getting There” produced jointly with PTEG and Oxfordshire County Council.⁷

To deliver the CWIS goals, there is a need for clear, specific and robust guidance to local authorities and LEAs, including:

- Concentrating new homes at existing transport hubs
- Designing new homes on the basis of low car dependency, with amended parking (including for cycling) standards, incentives for ‘car-free’ provision, and support for car clubs
- Including provision of cycling and walking infrastructure in local CIL obligations
- Introducing compulsory travel plans for major developments, with targets for modal share
- Redefining best practice in housing estate design, to permeate developments with direct walking and cycling routes, rather than current practice of having single “bottle neck” entrances shared by motorised and non-motorised users.

Adequate funding

A key factor in successful delivery will be adequate levels of funding and it is here that the admirable goals of the CWIS risk being undermined from the start. There is little or no additional funding specifically to deliver the CWIS, in stark contrast to the £15bn committed in the RIS1 (Road Investment Strategy).

The goal of seeing a doubling of cycling is laudable but must be matched by increased funding to enable this. We share the calls from Cycling UK and others for the Government to deliver on its goal of £10 per head expenditure on walking & cycling. This funding target should be reviewed in tandem with progress on delivery of the CWIS goals to check that it is fit for purpose. We note that Sustrans calculate that a budget of £8.2 billion – or £17.35 per person per year – is required over the next 10 years to achieve CWIS targets.⁸

We recognise that walking and cycling provision can be delivered by many agencies, and it is helpful to bring together in one place information on all the potential funding streams. This could be reinforced with a single website monitoring spend and providing a single portal to access different funding sources. This is particularly important for small local initiatives which may not have knowledge or expertise to navigate a very complex funding environment.

We note that in launching the CWIS consultation, Ministers write that its delivery “will require persistence, patience and resolution”. Clear targets, backed by devolved powers and the funds to deliver them, are vital too.

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Bridget Fox
Campaign for Better Transport

Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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⁷ [Getting there: How sustainable transport can support new development](#) (Campaign for Better Transport 2015)

⁸ [The investment required to achieve the Government’s ambition to double cycling activity by 2025](#) (Sustrans 2016)