

Ken Skates AM
Cabinet Secretary for Economy and Transport
National Assembly for Wales
Cardiff Bay
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10th May 2018

Dear Minister

Re: Proposal to allow HGVs to use bus lanes

As representatives of organisations involved in promoting healthy and sustainable travel and road safety, we write to voice our concern at the suggestion, made by Nick Jones (the Transport Commissioner for Wales) in his first Annual Report to the Welsh Government, that Heavy Goods Vehicles (HGVs) could be permitted to use certain bus lanes.

We urge you to reject it.

We summarise the grounds on which we would object to this proposal as follows:

- *Road safety*, especially for cyclists and other vulnerable road users. Although lorries account for just 3.6% of non-motorway motor traffic mileage on British roads, they are involved in around 17.5% of cyclist fatalities and almost 14% of pedestrian fatalities. The problem is particularly concentrated in urban areas, where most bus lanes are located. For instance, in 2015, lorries were involved in 78% of cyclist fatalities there, despite making up less than 4% of vehicle miles driven on London's roads.
- *Pollutant exposure*. Advocates of the proposed measure will doubtless claim that free-flowing lorries would emit fewer emissions. However those emissions would be closer to the kerb, where children and other pedestrians would be exposed to them. This is in addition to the complex issues of whether the measure would increase the use of road freight, or indeed whether they would drive more people to use cars instead of buses.
- *Bus journey time reliability*. Increasing the number of vehicles using bus lanes would inevitably undermine the journey time savings they provide for bus users. Experience from London has highlighted the importance of bus journey times – bus usage increased dramatically after Transport for London started enforcing its bus lanes strictly.
- *Enforcement*. TfL's enforcement measures relied on the use of cameras on board buses to identify any vehicle that was not a registered bus. If the range of vehicles permitted in bus lanes was increased – and varies from one bus lane to the next (as Nick Jones proposes) – this would make it much harder to provide effective enforcement through this or similar automated systems.

We note that, in an answer given in the Sennedd to the ***Economy, Infrastructure and Skills Committee*** (on the 21st March 2018), you said that full evaluation will be carried out to assess all

the impacts of such a measure. We believe that even a cursory evaluation should be sufficient to reject it, though we would wish to contribute more fully if a full evaluation were to go ahead. If that were to be the case, our strong request is that this evaluation should take account of:

- *The Well Being of Future Generations Act 2015*: we believe this proposal is incompatible with the Act's requirements to promote public health and safe, cohesive communities.
- *The Active Travel Act 2013*: this places a duty on Welsh Ministers (as well as local authorities) to take reasonable steps to improve provision for walking and cycling. Whilst bus lanes are by no means an ideal form of cycle provision (e.g. they are not sufficiently safe to permit children, older people etc to ride safely and confidently), they do provide important safety benefits for commuters and others wishing to cycle using urban main roads. These are typically the most direct routes, where provision for cycling should be enhanced, not eroded.
- *The Equality Act 2010* and the Welsh Government's regulations on the application of the Public Sector Equality Duty (PSED) in Wales. Whilst people of all ages, backgrounds and abilities may find it intimidating to cycle in fast and busy traffic, there is evidence that women, older people, children and people with disabilities are particularly deterred from doing so. The Welsh Government needs to consider the risk that permitting lorries into bus lanes might particularly deter these groups from being able to take advantage of the health, cost-saving, quality of life and other benefits of cycling for day-to-day travel.

We hope the above points will suffice to persuade you not to go ahead with detailed consideration of Nick Jones's proposal. However if you do proceed with this, we urge you to take account of the issues we have raised, and viewed in the light of all relevant legal duties. We would be happy to meet you or your officials to discuss our objections more fully, if that would be helpful.

Yours faithfully



Philippa Edmunds, Freight on Rail Manager, Campaign for Better Transport

Roger Geffen, Policy Director, Cycling UK

Rachel Maycock Wales Manager/Rheolwr Cymru, Living Streets Cymru

Steve Brooks, National Director, Sustrans Cymru

Joshua Harris, Director of Campaigns, Brake, the road safety charity

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