

# Response ID ANON-9864-96NC-U

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## 1 What is your name?

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**Organisation:**

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## 4 To what extent do you think that this consultation document reflects the road safety challenges currently experienced in London?

Disagree

**Please enter any comments :**

As the cycling target was missed in 2010 (while 4 out of the other 5 were met), I think that abandoning a cycling target is going in the wrong direction. An increase in cycle journeys was predicted (and under way) when the previous target was set; so I don't think that the increase in cycle journeys justifies the failure to meet the target. (And worryingly, it seems that there is little evidence of a 'safety in numbers' effect happening in London.)

While UK and London road casualty rates are generally good overall, we are not so good when it comes to cycle safety; so it is important to raise our game, learn from the best, and focus on the causes. Given this, I would like to see not just a cycling KSI target (preferably km-based) but also a clearer strategy to reduce cycling KSIs, focusing on the known causes of danger and doing more to test, utilise and evaluate policies and strategies adopted in countries that are leaders in this area. Perhaps, rather than just inviting their experts to address us, we should ask them to evaluate what we do for cycling and recommend specific improvements?

## 5 How well does this consultation document set the correct balance between the needs of all the London's road users?

Strongly disagree

**Please enter any comments:**

Latest TfL figures for London show that cyclists are 30 times more likely than car users to be killed or seriously injured per kilometre travelled. This figure is slightly higher than the national ratio (25:1, from DfT data), significantly higher than the Copenhagen ratio (13:1, in Holm et al, BMJ 2012), and much higher than the Dutch ratio (4:1, calculated by me using SWOV data). This is a major disproportionality and to my mind requires more concerned and strategic action. In terms of targets, TfL should set a km-based target for reducing cycling KSIs, and also regularly report on the risk ratio of cycle passenger km to car passenger km.

I would also like to see stronger support for speed reduction and dedicated space for cycling, especially given that many Cycle Superhighways are being built along the TLRN's strategic route network. In the draft, the movement of people is seen to pull in the opposite direction to safety and liveability, yet, cyclists are also people moving along the TLRN (and other routes). Wider application of 20mph speed limits and more dedicated space for cycling both promote safety and liveability, and support the movement of people using a mode that is (a) safe for others, (b) healthy, and (c) space efficient.

## 6 Are the problems facing vulnerable road users (pedestrians, pedal cyclists and powered two-wheeler riders) addressed sufficiently?

No

**Please enter any comments:**

Please see above for details; I do not believe that the disproportionate risk posed to cyclists is sufficiently addressed (especially given further increases in cycling are envisaged, and that policy aims for this to happen). I am concerned that the document implies an approach that sees education and technology as potentially eliminating mistakes. While I support improved enforcement, well targeted education, and technological improvements, those countries that are doing better in terms of cycle safety have recognised that some mistakes will still happen, however well trained and well behaved we are. The key is to create road situations where mistakes do not kill and seriously injure the vulnerable. The poster on page 34 is surely a good example - if cycling near HGVs is so dangerous, surely we should be doing more (to the highest international standards) to design these risks out of the road system?

In terms of targets, research, and data collection, I would also like to see consideration of 'subjective safety' in relation to cycling, common in higher-cycling countries; for example Copenhagen regularly reports on perceived safety and sets targets related to this. We do not currently collect such data, nor do we sufficiently study (and then provide) what kind of cycling environments people would like to see, what they like and don't like. We should also improve our collection of data relating to near misses; information about places that cyclists find frightening and where crashes regularly almost happen is important too - ensuring proactive planning rather than reacting to deaths and serious injuries after the fact.

## **7 What is your view on a London wide casualty reduction target for London?**

Strongly agree

### **Please enter any comments:**

Yes BUT it needs to be supplemented by mode-specific and rate-based targets. (per km travelled, not just per head of population - the latter, as the document acknowledges, is not very useful for exploring e.g. ethnic differences in risk for different modes). Also, given Figure 13, the target does not look particularly ambitious.

## **8 Are there any road safety issues which you feel are not adequately addressed in this consultation document? What are they and how should TfL address them?**

Yes

### **Please enter any comments:**

See above - in terms of cycling, I would like to see a focus first on designing risk out of the system (as far as possible), and secondly on changing the driver behaviours that endanger cyclists (for example, not indicating left when turning, passing too close). If we expect an increase in cycling beyond the traditional 'fit and the brave' who feel able to cycle in London, we must plan cycling environments that protect and encourage them. This includes monitoring how safe people with a range of abilities feel cycling on London's streets, and finding out what improvements people would like to see.

## **9 Are there any groups / stakeholders who should be given stronger recognition in this consultation document?**

Yes

### **Please enter any comments:**

I know TfL works closely with cycling groups and representatives, and so I find it odd that the document (page 72) specifically acknowledges motoring groups but not cycling (and, in fact, other mode user) groups.