City of London Road Danger Reduction and Active Travel Plan

3 August 2018

https://www.cityoflondon.gov.uk/services/transport-and-streets/road-safety/Documents/road-danger-reduction-and-active-travel-plan.pdf

Position paper from London Cycling Campaign

We strongly support the City of London's goal of "eliminating death and injury on our streets and improving the experience of cycling and walking¹" in its Road Danger Reduction and Active Travel Plan (The Plan).

We also welcome the road danger reduction (RDR) approach which seeks to tackle the sources of danger and the ambition to meet the Mayor's Vision Zero target of elimination all road deaths and serious injuries by 2041.

We think, however, that the City, with its unique position in terms of governance, policing and jurisdiction, should be more ambitious and aim to exceed Mayoral targets rather than describe them as "unrealistic".

Targets

We note the City's plan to target a slower rate of RDR than that set by the Mayor up to 2022, and only increase the rate of danger reduction thereafter. The City should be more ambitious: not just matching, but exceeding the Mayor's target to 2022.

Projects such as Bank junction show that City has the ability and resource to enact radical change to reduce road danger when required and to promote active travel. Rapid roll-out of the City's best practice on road danger and motor traffic reduction can both address the increasing number of incoming rail passengers and reduce through motor traffic in the square mile, thereby reducing casualties.

Infrastructure

¹ City of London "Road Danger Reduction and Active Travel Plan" 2018 page 3

We note that the Plan does not address infrastructure changes and traffic reduction plans which will be required to meet the City's targets. While some specific issues may be may be considered in the Transport Plan, infrastructure measures are integral to a 'systems' approach to RDR whether it is a case of installing more cycle tracks, or wider pavements, or filtering motor traffic away from areas with high potential for walking and cycling. These should all be clearly considered within the scope of this plan.

Behaviour change

The City of London is unique in the UK in having a small geographical area, a relatively well-resourced police force, effective control over planning and extensive camera coverage. These factors enable easier enforcement against unlawful or inconsiderate behaviour than other highway authorities.

The City must consider defining itself as a zone where unlawful behaviour is not tolerated and traffic and planning regulations are enforced. Making this clear to all road users at City boundaries and to all planning applicants would alert them to the potential of enforcement and encourage courteous behaviour. Respect for zebra crossings and yellow boxes are examples of self-enforcement through peer pressure as well as fear of penalties. The City of London Police should also 'buy in' to such a plan and coordinate closely with the City corporation.

Construction sites

We strongly support the City's use of procurement and planning controls to ensure the many construction sites on its territory comply with FORS (silver grade) and CLOCS standards. We share the view that this must be extended to all sites and, given the increased availability of lorries that are highly-rated for direct vision (five stars), this should include the default use of five star lorries on all future contracts.

We note that the Plan refers to the use of off-road (N3G) lorries with very poor direct vision for the purpose of accessing quarries and building sites. This is sometimes cited as the reason for using off-road vehicles on urban roads. With appropriate requirements in the City planning regulations, this need for off-road vehicles can be eliminated.

All building sites in the City must be required to have hard surfaces for deliveries, and developers must be required to utilise the many landfill sites identified by TfL as having hard surfaces for access. Such a requirement would enable contractors to use the N3 (not N3G) type of lorry, which has better direct vision and reduced danger to other road users.

Safer cars and taxis

We welcome plans to promote "Dutch reach" to all taxi and car passengers and drivers. We also welcome training in "Safer Urban Driving" for taxi and PHV drivers.

We also note our "Stay Wider of the Rider" campaign which explains the dangers of close passing to drivers in a humorous way as well as providing detailed advice. We strongly recommend the use of video and advice from the campaign (https://staywider.org/) in education sessions some drivers attend following a caution or offence.

Active travel and Healthy Streets

We share the City's view that it is imperative traffic schemes serve to increase active travel. We welcome timed deliveries out of peak hours and commend the series of interventions pioneered by TfL including:

- Road works patrol to sustain active travel through road works
- On-site concrete crushing to reduce lorry trips
- Robust loading and holding to reduce lorry trips at peak times
- Coordinated ducting arrangements

We also commend work by companies like McGee to reduce lorry journeys by managing vehicle journeys through GPS data, coordinating landfill removal and aggregate delivery to reduce empty lorry trips, use of apps to check vehicle safety. Some of the innovative work is more fully described in the series of CLOCS best-practice articles on the LCC website.

Trial schemes

We support temporary and permanent road restrictions as outlined by the Plan and would be pleased to provide stakeholder input as required.