

London Cycling Campaign response to the Pedestrian Safety Action Plan.

LCC is London's primary stakeholder group for cycle users with 40,000 supporters. We welcome the opportunity to comment on the Pedestrian Safety Action Plan.

Introduction

Measures to reduce road danger to pedestrians frequently have benefits for cycle user, and vice versa. Lower motor vehicle speeds, for example, benefit all vulnerable road users. We therefore commend to TfL the extensive comments of Living Streets, which represents pedestrian interests, on the Plan notably the observation that :

"The final plan would benefit from including specific targets with regular milestones to reduce the number of pedestrians killed and seriously injured on London"

We share the view that the Plan must be accompanied by measurable outcomes and a clear strategy and timetable to reduce casualties. We note that both pedestrian and cycling serious casualties have risen in the past two years – this is reversal of the previous trend.

We submit the following additional comments, most of which are also referenced in previous LCC responses to the Mayor's Vision for Cycling, the London Assembly's scrutiny of cycling and our current Space for Cycling campaign.

Speed and Enforcement

Reducing motor vehicle speeds helps to reduce the incidence and severity of collisions for all road users. We note that as part of the LCC Space for Cycling Campaign local people in 624 local council wards in the capital selected key issues for cyclists and in more than hundred wards reducing vehicle speeds was identified as a measure to adopt.

While the Plan appears to recognise the principle that reducing speeds reduces collisions and their severity it does not follow through by taking the logical step of introducing 20 mph speed limits on most TfL roads where people live, work and shop, nor does it fully support or recommend that all local authorities should adopt 20 mph limits on residential and shopping streets as a default. In countries like the Netherlands it is routine for a speed limit of 30 kph (20 mph) to be in force on streets used by cyclists that do not have separate cycling facilities.

We note that in Kensington and Chelsea, Exhibition Road has a 20 mph limit whereas all the residential side streets have a, conspicuously signed, 30 mph speed limit. Such poor examples undermine public confidence . With the right legislation and a uniform adoption of 20 mph in residential streets in the capital such anomalies would not occur.

We note the plans to progress Intelligent Speed Adaptation and would like to see its use in public service vehicles as a way of encouraging all vehicles to obey speed restrictions. We would also like to see average speed cameras more commonly used as these have an evident effect in reducing illegal speeds.

HGVs and Buses

We strongly support measures to reduce road danger from heavy vehicles. We note that all London boroughs now offer Safer Urban Driving (SUD) courses to lorry drivers and would like to see such training made a compulsory part of a lorry driver's Certificate of Professional Competence training. We also note that TfL has adopted a series of requirements including lorry safety equipment and SUD training in its procurement process. We would like to see similar requirements adopted by all London local authorities and suggest that TfL makes this explicit in the Plan.

We support TfL's plans to extend a similar programme to SUD, as noted in the Plan, to bus drivers in the capital.

Junctions

The Mayor and TfL initiated the Better Junctions programme to reduce road danger to vulnerable road users. The number of junctions to be addressed has been reduced to 33 and the funding increased but implementation has been very slow amounting to what TfL has recently described as 'minor, often cosmetic changes.'

The Plan should express TfL's commitments to complete the Better Junctions programme to a standard that genuinely improves conditions for walkers and cyclists and does not stop short of satisfactory solutions because of concerns about alleged impact on motor capacity.

The Plan must also reflect the more recent Mayoral commitment to remove the worst 'gyratories' and roundabouts which, to quote the Mayor 'blight and menace whole neighbourhoods.'

Vehicle safety features

We note the progress in vehicle design to minimise the severity of injuries. This must be accompanied by enforcement against the use of illegal 'bull bars' in urban conditions. There are still vehicles in London with such accessories which serve no useful function but can increase the severity of collisions.

We are also concerned at the popularity of tinted windows which in some cases exceed the permitted levels of darkness. Blacked out windows make it impossible to detect the presence of drivers or passengers in parked vehicles which may be about to open a door into the face of an approaching cyclist. Dark windscreens also make it difficult to establish eye contact with drivers to ensure safe manoeuvres on the road. Workshops must not be permitted to tint windows beyond allowable levels and we would like to see a reduction in the levels of tint permitted on rear and side windows.

Pedestrian and cyclist priority

We note and welcome TfL's plan to raise the matter of re-enforcing priority for 'straight-on' pedestrians over vehicles turning into side streets with central Government. The same issue is a concern for cyclists, notably those on cycle tracks or protected lanes. In the Netherlands all vehicles give way to straight-on traffic whether cars, people or cyclists. TfL's arguments should bring up the case of cyclists as well as pedestrians.

Data sharing

We note that Living Streets has expressed concerns about data collection and sharing. LCC agrees with the view that timely information about fatal and serious collisions in particular should be shared with stakeholders on a more frequent basis.