

Response to Transport for London's draft Transparency Strategy March 2015



London Cycling Campaign is a charity with more than 40,000 supporters of whom 12,000 are full members. We speak up on behalf of everyone who cycles, or wants to cycle, in Greater London. Our aim is for London to be a world class cycling city. Founded in 1978, our organisation campaigns for every street in the city to be cycle friendly so millions more Londoners, whatever the age or ability, can enjoy the benefits of cycling, helping to create a cleaner, healthier and less congested capital.

We welcome the opportunity to comment on Transport for London's draft Transparency Strategy.

Introduction

We welcome the creation of a transparency strategy. Transparency in the data-rich area of transport is extremely important and there is a need for easily accessible information which can inform travel choices, improve performance and for public bodies and operators to be held to account on their spending and outcomes. Raw data held by Transport for London was derived from citizens, and must not be denied to the public, obstructing progress.

London Cycling Campaign recognises that a substantial amount of data is published in relation to London's transport network. However, it is critical that this data is easily accessible and searchable. There must also be full transparency on what data exists currently. While we recognise that there is resource involved in making data accessible and publicly available, even shorter-term economic advantages outweigh the potential costs. The Shakespeare review of public sector information published in 2013 highlighted the £15-58 million each year in saved time for users of Transport for London's live travel information.

Transport for London's draft transport strategy recognises the value of making this data available. However, London Cycling Campaign would like to see a far broader range of data made publicly available and searchable, and a set of public data principles defined. To enable users to find and re-use data effectively, it must be archived and made publicly accessible in a useable and standardised format with relevant metadata.

How data should be used

We suggest that these public data principles should fall in line with the principles drawn up by the government's Public Sector Transparency Board. For example:

- 1) Transport for London's public data policy and practice will be clearly driven by the public, researchers and businesses that want to use the data, including what data is released when and in what form
- (2) Transport for London will publish public data in re-usable, machine-readable form
- (3) Transport for London will release public data under an open licence which enables free re-use

(4) Public data will be available and easy to find through a single, easy-to-use, online access point (www.tfl.gov.uk)

(5) Public data will be published using open standards, and following relevant recommendations of the World Wide Web Consortium (W3C)

(6) Public data from different departments about the same subject will be published in the same, standard formats and with the same definitions

(7) Public data underlying Transport for London's own website will be published in re-usable form

(8) Public data will be timely and fine-grained

(9) Transport for London will release data quickly, and then work to make sure that it is available in open standard formats, including linked data forms

(10) Public data will be freely available to use in any lawful way

(11) Public data will be available without application or registration, and without requiring details of the user

(12) Transport for London should actively encourage the re-use of their public data

(13) Transport for London will maintain and publish inventories of their data holdings

(14) Transport for London should publish relevant metadata about their datasets and this should be available through a single online access point; and they should publish supporting descriptions of the format provenance and meaning of the data

Alongside these principles, Transport for London should adopt a clear and measurable plan for publishing all the data it holds as quickly as possible. This plan should be visible and accessible to influence through open feedback mechanisms. The data, when published, must be made useful: infrastructure to ensure data is searchable and accessible is critical and is an essential investment. PDF releases are not good practice.

London Cycling Campaign would like to see the creation of a panel to review what data Transport for London makes available, to champion transparency principles and ensure the transparency strategy is adhered to.

Traffic modelling data

There is a current lack of transparency behind Transport for London's traffic modelling processes. The assumptions that underpin traffic modelling and the structure of Transport for London's network performance hierarchy regularly puts barriers in the way of what elected representatives (whether at GLA or in London Boroughs) are trying to achieve. Andrew Gilligan, the Mayor's Cycling Commissioner, at the GLA Transport Committee meeting in December 2014 stated: 'The modelling has often been too pessimistic in the past and you can see that by what it predicted compared to what has actually happened. It predicted, for instance, that the abolition of the Western Extension to the Congestion Charge Zone would cause between 8% and 12% more traffic in the Zone and a rise of 15% to 21% in congestion. The actual rise was 6%. It predicted a drop in traffic speeds of 6% to

12%. The actual drop was 3%. On one of the cycle schemes we have already done, the first fully segregated Superhighway stretch in Stratford High Street, it predicted delays of about a minute-and-a-half or a minute-and-a-quarter for bus services on that road. Actually, the delay has been negligible.” Many others have recognised the limitations of TfL’s traffic modelling, yet it continues to be a barrier to schemes which could be enormously beneficial to London’s transport network.

Transport for London must:

1. Put the modelling data into the public domain preferably on an open data platform which can then be queried by interested parties &/or other local government bodies.
2. Put different design approaches, that are dismissed as not viable prior to public consultation, into the public domain with the rationale as to why the decision was taken not to proceed. This would ensure that the decisions taken by TfL can be comfortably defended in the public arena.

Responses to specific sections of the draft Transparency Strategy

How we develop our approach

The draft transparency strategy states that Transport for London constantly analyses what its customers and users say are important, derived from, among other sources, questions and complaints, regular customer research, scrutiny from the London Assembly and London TravelWatch and from Freedom of Information requests.

London Cycling Campaign recognises these methodologies, yet we have concerns that they do not adequately represent cycling; questions are rarely posted by London TravelWatch in relation to cycling, and the lack of representation of cycling or walking on the Transport for London board has been raised repeatedly by LCC and others. We urge Transport for London to review its channels to ensure that the interests of all stakeholder groups are given consideration, and that certain interests are not prioritised over others based on the composition of boards or interests of individuals.

The draft transparency strategy states that the ‘presumption is that all information should be made publicly available and, in the case of data, in machine readable form, unless there are legitimate reasons why not – for example, disproportionate cost, personal data or information which would harm our ability to maximise value for money for fare and tax payers.’ We support the presumption that all information should be made publicly available and ask that Transport for London makes public and visible the reason why any data has not been made public, along with feedback mechanisms.

Operational performance

The draft transparency strategy gives examples of detailed information published about Transport for London’s operations. London Cycling Campaign welcomes this data, but believes provision of data could be improved, for example KSI data.

All police investigations of KSIs incidents need to be made public, on an easy-to-search database. As a minimum the reports should be filed and accessible in the same way that the Chief Coroner

publishes the PDFs issued by Coroners here: <http://www.judiciary.gov.uk/subject/road-highways-safety-related-deaths/>

Additional data should be made available and searchable, including but not limited to:

Investigations into alleged dangerous driving by TfL service providers

At present, if there is an allegation of dangerous driving by a bus driver, Transport for London does not investigate the allegation itself but passes it on to the bus operator. The outcome of this investigation must be passed back to Transport for London and made publicly available.

Traffic counts

Traffic flows on the TLRN must be made public, on an easy-to-search database. This includes, but is not limited to, cycle and pedestrian counts. APIs of all recent data is required.

Safety audits

All safety audits that have been conducted should be made available.

Highway measurements

As used by transport planners and engineers in developing designs for junctions and highways

Signalling timings

The signalling regime for all junctions.

Representative historical sets of SCOOT data showing traffic flows through junctions at different times of day

Freedom of information requests

Transport for London should publish all data it releases via Freedom of Information requests, along with the reasons where a request has not been responded to.

Data from other transport authorities in London should be incorporated into the London Datastore in a consistent manner.

The investment programme

The draft transparency strategy states that Transport for London publishes major programmes and projects and details of significant projects, plus an annual report, which sets out the improvements delivered. However, it is currently difficult to access past research and not possible to access information about planned research through publicly accessible channels. Transport for London should publish and keep up to date a register of current research plans, along with expected publication data for the results. This register should be updated with new research on an ongoing basis, and be visible and accessible to influence through open feedback mechanisms.

Our people

London Cycling Campaign recognises that Transport for London publishes a high-level organisation chart. However, data is not made available for contacts at other levels.

London Cycling Campaign has local groups in every London borough who liaise with local authorities on cycling issues. However, our local groups find it extremely difficult to discuss issues directly with Transport for London officers working on relevant projects. London Cycling Campaign is keen to establish a mechanism through which its local groups are able to access relevant contacts within Transport for London and discuss issues directly with them. The lack of local accountability at present is causing serious barriers to engagement on projects where local authorities and Transport for London should work together to engage with stakeholders at a local level.

Accountability

In the absence of a separate accountability strategy, accountability must be a key part of TfL's transparency strategy.

The draft transparency strategy references that processes around decision making have changed. However, while information about decision-making is made available, London Cycling Campaign has concerns that the process of the decision-making itself is not conducted transparently.

As key stakeholders, London Cycling Campaign should be involved at the outset of relevant projects. Plans and designs for projects must be developed with stakeholder input.

Representatives of stakeholder groups should be invited to join decision making committees (see concerns raised under Our people, above).

Outcomes of internal design reviews and rationale for decisions should be made public, along with Transport for London's responses to stakeholder consultation responses.

Individuals appointed by Transport for London or the Mayor's office must adhere to Transport for London's transparency strategy, including political appointees.