

Brake response to City of London Draft Transport Strategy

13.01.18

Background

1. Brake is a national charity, founded in 1995, working for safe and healthy mobility, and caring for families bereaved and injured in road crashes. Brake promotes safe and sustainable road use, and effective road safety policies by government and its agencies and by leaders in civil society too. We do this through national campaigns, community awareness raising, road risk management advice for employers, and by coordinating the UK's flagship road safety event every November, Road Safety Week. Brake is also a national, government-funded provider of support to families and individuals devastated by road death and serious injury, including through a helpline and support packs.

Introduction

2. Brake believes that safe and healthy mobility should be a human right and authorities have a duty to take all steps to make this a right they meet. We advocate a design-led approach to road safety management to achieve this, following a safe systems, Vision Zero and Healthy Streets approach.
3. We welcome this draft Transport Strategy and view it as a comprehensive and forward-thinking plan for safe and healthy mobility within the City of London. Road safety must no longer be thought of in isolation and needs to be considered in the context of health and wellbeing, pollution and environmental factors, liveability, happiness and equality, as well as the more traditional themes of mobility and accessibility. We are pleased to see that this draft strategy embraces these themes.
4. Road safety is also not a competitive issue, it is one in which collaboration and knowledge-share is crucial and where a rising tide will lift all boats. We would therefore support the inclusion of an explicit commitment within the strategy for the City of London to share its learning and collaborate with the London boroughs, and any other city and region, to help others deliver the path to zero, particularly through the setting of standards that can be shared, similar to TfL's work setting the Bus Safety Standard, and the Healthy Streets standard and its performance indicators. Such a focus on standards, and collaboration and willingness to work with partners, including supportive NGOs like Brake, will also be crucial to the success of the strategy itself. For example, the draft strategy includes measures which rely directly on the ability to influence external decision-makers (such as the 15mph speed limit, detailed in Proposal 20, or the Turning the Corner campaign, detailed in Proposal 15). Brake will be happy to work with the City's representatives on such measures and be a visible, supporting civil society partner. Additionally, many other proposals rely strongly on enforcement and/or effective communication/ awareness campaigns which, to be a success, must reach beyond the regular users of the City. The City of London does not operate in isolation and therefore collaboration with the police and other stakeholders will be key to delivering on this vision.
5. Brake considers this draft strategy as, on the face of it, in many ways representing 'best in class', and as such, we would like to see the City and its representatives embrace this role and play an active part in the Vision Zero and Healthy Streets movement in the UK and globally. Brake will be among those leading the charge for this movement in 2019 and will shortly be publishing our Vision Zero manifesto (a draft excerpt of which can be found in Annex 1).

Comment on specific proposals

6. Proposal 1, “Embed the Healthy Streets Approach in transport planning and delivery”, is fully supported by Brake. A Healthy Street prioritises the needs of people over the needs of traffic and therefore contributes to a more welcoming, clean and safe urban environment. Further clarity on how the Healthy Streets Indicators and Check for Designers will be baked into decision making within the City would be welcome, including whether a threshold Healthy Streets score will be required to be passed for design approval. Brake would support the City of London committing to only implement schemes which do not score 0 in any of the Healthy Streets Check critical metrics.
7. Proposal 2, “Put the needs of people walking first when designing and managing our streets”, is fundamental to the delivery of Healthy Streets and is supportive of the Mayor of London’s target for 80% of all journeys in the capital to be by walking, cycling, or public transport by 2041¹. The delivery of this principle, through mechanisms such as taking a proactive approach to reducing motor traffic (Proposal 11), support for changing junction priority (Proposal 15), and through the adoption of a safe systems and Vision Zero approach (Proposal 20) is welcomed. The draft strategy also acknowledges the importance of the role of provision for cycling, to mediate any mobility losses from the reduction in motorised traffic, and this too is supported by Brake. Provision for cycling is part of the Healthy Streets indicators and should be afforded appropriate investment and priority, as detailed in Proposal 24 (to apply a minimum cycling level of service to all streets). To note, NICE, the National Institute for Health and Care Excellence, has recently published a draft quality standard on “Physical activity: encouraging activity in the general population”, which includes the quality statement “Local authorities develop and maintain connected travel routes that prioritise pedestrians, cyclists and people who use public transport”².
8. Proposal 20, “Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero”, is fundamental to this draft strategy. Brake has long advocated a safe systems approach, which is proven as the only effective method of reducing, and ultimately eliminating, road death and injury. The delivery of such an approach must detail the milestones and performance indicators to achieve the goal of Vision Zero, and so we welcome the targets for road casualty reduction set in the draft. We also welcome, and applaud, the ambition to set a 15mph speed limit within the City of London by 2022. As well as being an important safety measure, with stopping distances at 15mph two-thirds of the stopping distance at 20mph³, it is noteworthy as a statement of the principle of the prioritisation of people, not vehicles, as outlined in Proposal 2.
9. Transport for London has identified that of the 69 pedestrians and cyclists killed in London in 2016, 27 (or 39%) were involved in a collision with an HGV or a bus⁴. Furthermore, it is 6.37 times more likely that a bus or coach will be involved in fatal collisions with people in London, relative to their share of traffic, and 5.46 times for HGVs. Regarding fatal collisions with people cycling, HGVs are 15.14 times riskier, relative to their share of traffic, with buses and coaches 2.22 times⁵. A focus on larger vehicles, is therefore crucial, and we welcome the proposals in the strategy which look to improve freight and bus safety.

¹ [Mayor’s Transport Strategy](#), GLA, 2018

² [Physical activity: encouraging activity in the general population \(draft quality standard\)](#), NICE, 2019

³ [Stopping Distance calculator](#), Highway Code

⁴ [Collisions and casualties on London’s Roads](#), TfL, 2016

⁵ [Vision Zero action plan](#), Mayor of London and TfL, 2018

10. Proposal 38, “Reduce the number of freight vehicles in the Square Mile”, and its associated targets for reductions in total motorised freight vehicles and motorised peak time freight vehicles are robust measures. Brake offers best practice advice and guidance for fleet safety through Brake Professional and the, soon to be launched, Global Fleet Champions initiative. Brake would welcome working with the City to both share best practice examples and promote the work of the City through the new Transport Strategy.
11. Adequate public transport provision is vital to enable active travel choices providing easy connections between people’s homes, transport hubs and places of work, reducing the reliance on private motor vehicles, and encouraging active travel to access public transport hubs. The City is already well serviced by bus, train and the underground, as detailed in the draft strategy, but it is important to highlight that the strength of public transport provision, especially for those with impaired mobility, is vital to the delivery of this strategy, and its connection with active travel options.
12. The aims of reducing road casualties, and the delivery of more active travel, go hand-in-hand with addressing environmental concerns, in particular those relating to vehicle emissions and noise, which cause extensive fear, stress, anxiety and illness. Reducing the total number of motor vehicles is key to this but, as acknowledged in the strategy, there will still be a role for motor vehicles, such as for public transport or freight, in the future. It is, therefore, imperative that measures are put in place to ensure that the motor vehicles, which are permitted to remain on the roads, pollute as little as possible. Proposal 29, “Support and champion a central London Zero Emission Zone”, and related proposals (30, 31, 32, 33, 34, 36, 41) are, again, welcomed.
13. Proposal 40, “Allow some Local Access streets to function as City Access streets during significant disruption” needs to be considered in the context of road safety. Primary Resilience Network streets should only be activated in times of extraordinary disruption. It is important not to set a precedent for regularly using these streets as a mechanism to alleviate traffic congestion, such as the daily congestion that occurs during weekday morning and evening peaks.
14. The commitment to review and update the Strategy every five years (and the Delivery Plan annually) as well as the Proposals 43, 44 and 45, which focus on Future Transport, are important. We are currently experiencing a revolution in the design of our vehicles, as manufacturers of vehicles, vehicle components, and road infrastructure strive for CAV (autonomous vehicles that are connected intelligently to the road and each other). CAV provides enormous potential to improve safety by ultimately, maybe, resulting in driverless vehicles and ridding roads of driver error and driver crime. Whether we achieve a goal of driverless vehicles or not, vehicle and road infrastructure manufacturers are making significant advances towards that goal. These advances are improving vehicle and road infrastructure safety now, through active safety systems (systems that help prevent vehicles crashing and speeding) and passive safety systems (systems that mitigate damage caused to people when vehicles do crash). The rate of these advances, and the complexity of the implications they may have on the road environment, make it important for the City of London’s Transport Strategy to evolve alongside such developments.
15. The development of autonomous vehicles must not come at a cost to space for people walking and cycling. The Law Commission is currently undertaking a consultation on automated vehicles⁶, and questions such as these will be at the forefront of Brake’s submission. The strategy should consider what space will be required for automated vehicles, such as pods, which may be required to be separated from the normal traffic flow, due to their lack of collision protection,

⁶ [Automated Vehicles: a joint preliminary consultation paper](#), Law Commission, 2018

especially if HGVs are still permitted to operate on the City's roads concurrently, but also importantly separated from space that we need for active travel by walking and cycling. Autonomous vehicles must not dominate our space and prevent us from being healthy.

16. We believe that one aspect missing from the strategy is the acknowledgement of the devastating impact that road crashes have on those affected and the delivery of supportive action for road crash victims. Brake would be pleased to work with the City on such measures, including signposting and support for Brake's National Road Victim Service⁷, which is accredited and includes a freephone helpline and information packs for families, distributed by all police forces including across London and the south east.

⁷ [Brake's National Road Victim Service](#)

Annex 1

Excerpt from Brake's draft Vision Zero Manifesto

The world that progressive engineers and planners are trying to create

Below is a picture of the world that progressive engineers and planners are trying to create, and that some leaders, in high income nations, hope to achieve by 2040 or shortly after.

1. Safe and healthy cities, towns and villages

- **The spaces between buildings prioritise people above traffic. The space lets us move, sit and meet, play and be safe.** We have unimpeded, well-lit, obstacle-free cycle paths and foot paths with well-maintained surfaces for efficient travel, getting us where we need to go, directly from homes, or public transport hubs, walking or cycling at the speed we want to go at. We can stop, rest and meet each other in traffic-free spaces, with pleasant, shaded, sheltered seating, places for children to play, and access to water and toilets. It is normal to walk and cycle for our short journeys, and many of us choose to walk and cycle longer journeys too, across our towns and cities.
- **Public transport (such as trains, buses, trams) is accessible;** we reach it easily by walking or cycling, and it arrives frequently, or can be hailed. It is fairly-priced, clean, not overcrowded and disability-friendly. It connects us with our bicycles; there is cycle storage on-board and at stops. If there is no cycle storage on board, we can easily pick up a bicycle at the other end of our journey. It is possible we may still hail private taxis only for us, and to meet our needs in some situations, but our normal choice is to walk, cycle and use shared transport.
- **Road infrastructure is intelligent.** It connects and communicates with vehicles through vehicle-to-infrastructure (V2I) technology to enable safety, including speed limit compliance. Road infrastructure gives priority to people on foot and bicycles at junctions and crossings.
- **Less space is needed for roads and places to park,** because we have changed the way we move, and have less need for privately-owned cars and parking spaces for them. We have used this space to create places for people.
- Our walking and cycling paths, our public spaces and our road infrastructure meet internationally-recognised, best practice **standards** based on the needs of people.
- **When planning new developments, or redeveloping an area of a city or town,** we minimise the distance people need to travel to access amenities as well as building according to the above principles. We give people more mobility outcomes partly by bringing amenities closer.
- **Allowable vehicles are designed for the safety of pedestrian and cyclists as well as occupants and travel below speed limits of 20mph or lower;** and are emission-free. They provide essential services efficiently, such as shared transport, moving our goods, emergency and social services. They are allowed only where they need to go.