

'Asks' for the Department for Transport, European Commission and other UK Government Departments

Summary

Transport for London (TfL) Surface Transport are working closely with colleagues at the Department for Transport (DfT), European Commission (EC) and other Government organisations to push for a number of changes to policy, regulations, directives and legislation to improve road safety in London. While these changes are driven by the need to improve road safety a number of them will also bring wider benefits such as speedier decisions on introducing new infrastructure and road signage, devolution of decisions to local authorities and reduced street clutter.

This paper outlines the priority lobbying areas for TfL Surface Transport and has been developed with input from Surface Planning and the Roads, Traffic and Community, Safety, Enforcement and Policing (CSEP) Directorates. The first six sections of this paper relate to changes that fall under the DfT's Traffic Signs Regulations and General Directions 2002 document (TSRGD), and which are of particular importance. Section seven covers off other changes to TSRGD that TfL will be lobbying for. The subsequent sections describe changes other than those to TSRGD.

1. TSRGD - Advanced Stop Lines (ASLs)

Requested change:

- DfT to change regulations to allow cyclists to cross any part of the first stop line legally at traffic signals
- DfT to allow deeper Advance Stop Line reservoirs at signal controlled junctions
- DfT to allow part-width ASL reservoirs, to encourage cyclists to keep to the correct/nearside lane, particularly where right turns are not allowed
- DfT to create a specific civil offence for the infringement of an ASL by motorised traffic when the signal is red (by amending Schedule 7 of the Traffic Management Act 2004; Section 36 of the Road Traffic Act 1998; and also TSRGD 2002).
- DfT to change regulations to allow provision of ASLs at stand-alone signalised pedestrian crossings

Context and expected outcome:

- Presently, cyclists cannot legally gain access to an ASL except via the lead-in lane or gate, which may not be placed in such a way as to help the cyclist enter the ASL in the safest way. Entering an ASL without using the lead-in lane or gate can result in a fine from the Police.
- Changes to regulations on cyclists entering ASLs will make enforcing against infringements of ASLs by motorised road users easier for the police, and thereby ensure wider compliance by all road users. This could be supported by use of low-level cycle signals at the ASL, moving the primary signal for general traffic back to the first stop line.
- Changes will also ensure that cyclists are not forced into potentially dangerous manoeuvres when trying to enter an ASL – for example having to pass down the inside of lorries and buses in order to access the ASL via the provided feeder lane.

- The DfT has authorised ASLs to a depth of 7.5m on the Transport for London Road Network (TLRN), this is up from 5m. Nationwide authorisation might be granted depending on the outcome of the changes to the TLRN locations.
- It is currently a criminal offence for all traffic to cross the advance stop line whilst a red signal is displayed, enforceable by FPN (£60), plus three points on the driver's licence. Whilst this penalty is appropriate for a vehicle running a red light, a civil enforcement regime with financial penalties is more appropriate for the less dangerous offence of encroachment into an ASL whilst the signal is red. The Police are currently not resourced to enforce ASL and bringing the offence on a par with yellow box junctions and bus lanes offences would be more acceptable to motorists.
- Currently TSRGD prescribes use of ASLs at signalised junctions only, precluding their use at stand alone signalised pedestrian crossings.

Timescales:

- 2013 onwards – work is underway inline with lobbying for changes to TSRGD. The Metropolitan Police Service and City of London Police will be undertaking activity in Summer 2013 to highlight correct use of ASLs at locations across the city. This will include awareness raising with both motorists and cyclists.

2. TSRGD - Changes to signage regulations

Requested change:

- DfT to approve signage for "Cycle Streets", so that TfL can promote trials
- DfT to ease signage requirements for 20mph limit implementation
- DfT to permit the use of the cycle symbols on temporary traffic management signs without site specific approval
- DfT to permit the use of more (smaller) size options for many signs for cyclists, to help reduce street clutter
- DfT to remove illumination requirements for signs that terminate cycle tracks and adjacent and shared paths

Context and expected outcome:

- A cycle street is a link which is designed to restrict use by motor traffic and provide a superior level of service to cyclists
- To make it easier to trial and use new signs aimed at cyclists and also in 20mph zones.
- To increase the speed with which new sign types can be used in temporary traffic management.

Timescales:

Ongoing in 2013.

3. TSRGD - Low Level Cycle Signals

Requested change:

- DfT to permit smaller diameter aspects (in the region of 90mm to 100mm)
- DfT to permit cycle logos on all three aspects
- DfT to permit mounting at a lower height (2.1m is the current minimum)

Context and expected outcome:

- Off-street trials starting this week on a purpose built junction and stand alone crossing facility on the TRL test track.
- Following trials, a report with the findings will be prepared by Transport Research Laboratory (TRL) and TfL. TfL will engage with the DfT to consider the findings from the trials with a view to progress on-street trials as soon as possible.
- Available product comparison has been completed. This will help with the writing of the product specification to get either an amendment to the current Highways Agency type approval specification or write a new specification.
- The Highways Agency approves the equipment, whereas the DfT approve the sign on the equipment. Traffic Signals are treated as a "sign" by the DfT.
- This is hoped to be a new traffic signal, and not an amendment to an existing signal.
- Low level cycle signals view will provide greater benefit to cyclists by enabling them to see traffic signals more clearly whilst waiting at traffic lights;
- By trialling and potentially introducing low level cycle signals it provides an opportunity to provide early release for cyclists ahead of other traffic;
- It is also noted that there could be an opportunity, with low level cycle signals, to provide a 'split' signal design at ASLs. This would involve having a set of low level cycle traffic signals at the head of the ASL for cyclists and a set of standard traffic lights located at the back of the ASL for other road users.

Timescales:

- Ongoing in 2013. On street trials to be carried out for approximately 18 months during 2014. Trials to influence the changes to TSRGD due for release at the end of 2014.

4. TSRGD – Cyclist Red Light Aspect
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Requested change:

- DfT to allow red cycle aspect on a standard 200mm signal head (this as a change to Fig 3000.2 in TSRGD)

Context and expected outcome:

- Trials have been completed and the final report from TRL is due soon. TfL will engage with the DfT to consider the finding from the trials with a view to progress on-street trials as soon as possible".
- This report will be sent to the DfT together with a list of sites for which site-specific authorisation will be sought to install this type of signal aspect;
- By providing a cycle symbol on the red aspect of standard traffic signals, greater clarity will be provided to cyclists that the traffic signal is directed at them and not other traffic where these types of signal are used.

Timescales:

- TfL have been working closely with the DfT in developing the TRL trials and will continue to hold discussions on commencing on street trials in 2013/14. The DfT have been closely involved in working groups associated with the TRL trials
- On street trials to be carried out for approx 18 months during 13/14
- Trials to influence the changes to TSRGD due for release end 2014

5. TSRGD - Illumination requirements.

Requested change:

- DfT to grant more power to Local Authorities to make decisions on issues of which road signs must be directly illuminated

Context and expected outcome:

- The current regulations take a risk based approach over which signs must be directly illuminated, but the risk is assessed at high level, leaving little discretion for local highway authorities to make sensible decisions to reflect local circumstances.
- The TRL research undertaken for CSS in 2007 (PPR382) concluded that some £5.86m is spent annually on energy for the illumination of traffic signs and that a significant proportion of the £1.29 billion spent each year on traffic signs maintenance could be saved if these signs were not directly illuminated.
- GB is virtually alone in the world in prescribing the direct illumination of traffic signs in streets which have street lighting. In NI the policy is not to directly illuminate signs unless there is a strong case to do so.
- Throughout the Traffic Signs Policy review process practitioners have expressed the view that the illumination requirements within TSRGD are over prescriptive and unsustainable. This is evidenced by the ever growing number of authorities who are simply not complying with TSRGD.
- TfL would like to see change in mindset at DfT, appreciating the wider implications of prescribing which signs and circumstances dictate direct illumination, without taking local factors into consideration. Trusting local highway authorities to be fully responsible for their actions. Removing the prescriptive controls over use of direct illumination and reflective materials.

Timescales:

- TfL would like to see immediate action on this in 2013 and will be in discussion with the DfT on these issues.

6. TSRGD - Over prescriptive nature

Requested change:

- DfT to apply a less prescriptive, more flexible, approach within TSRGD, laying out a framework but with more flexible use of signs

Context and expected outcome:

- TSRGD takes a very prescriptive approach to the messages which can be conveyed by traffic signs, to the extent that it can constrain sensible application of its provisions. Examples as follows:-
- The 'No Entry' (diag 616) sign can now be used with a supplementary plate 'except buses' (diag 954) or 'except cycles' (diag 954.4) but not with 'except buses and cycles' (diag 954.3). While special signs approval for the alternative was readily granted, the regulations should be framed in such a manner for that to be unnecessary.
- Where a 20mph zone abuts a 20mph limit the correct interpretation of the regulations requires a traffic sign to diagram 675 at the intersection point, indicating 20mph end and 20mph start. A sensible compromise was approved by

special signs authorisation, but again the regulations should be framed in such a manner for that to be unnecessary.

Timescales:

- With TSRGD review programme in 2013/14. TfL is already in discussion with the DfT on changes to TSRGD.

7. TSRGD - Other Changes

Requested change:

DfT to change Traffic Signs Regulations and General Directions 2002 (TSRGD) planned for publication at the end of 2014, and TfL to gain interim authorisation where necessary to enable the introduction of a number of measures prior to TSRGD changes. Changes and interim authorisation include:

- Allow new markings for cycle lanes through junctions;
- Provide more options for signs and markings to provide contra-flow cycling in one-way streets;
- Allow use of edge of carriageway markings (1-metre long dashes) where cycle lanes cross side-road junctions or through signal-controlled junctions;
- Allow wider line markings for cycle lanes (250mm as well as 150mm);
- Allow legal priority for pedestrians and cyclists crossing side-road junctions (implied for pedestrians by Rules 8 and 170 of the Highway Code but not covered by law);
- Change regulations on zig-zag markings at zebra crossings (to allow cycle lanes or tracks to continue up to the crossing);
- Allow the provision of cycle waiting areas ahead of pedestrian crossings at junctions to allow for the second part of a two-stage right-turn;
- Allow the general use of elephant's footprint markings (WBM 294) for cycling routing at signal controlled junctions and crossings;
- Allow 'Intelligent ambers' for cyclists, allowing left turning cyclists to proceed with caution, with give-way to pedestrians;
- 'Green waves' on linked signals at 20mph or less (in place of 30mph 'platoons', which favour motor vehicles and disadvantage cyclists).

Context and expected outcome:

- Changes to TSRGD to allow interim authorisation and the trialling of new infrastructure practices will enable TfL and other authorities in the UK to improve cycling facilities and safety through a range of new interventions.

Timescales:

- Current discussions with DfT. Revisions to TSRGD are due to be published late in 2014.

8. Toucan Crossings

Requested change:

- DfT to standardise the crossing and clearance timings at Toucan Crossings. (update to Local Transport Note 295)

Context and expected outcome:

- Different timings exist for nearside and farside Toucan Crossings currently

- This is not part of the TRL trials, but is hoped to be captured within TfL's Traffic Directorate as part of the Corridor Improvement Programme.
- Initial discussions with the DfT have been held to identify the process and steps that TfL have to undertake to get this change agreed.
- Sites being identified where this can be trialled.

Timescales:

Trials to commence in late 2013. Discussions have been ongoing with the DfT who have been heavily involved in working groups on developing proposals as part of the TRL trials. TfL will be working closely with the DfT going forward to press for interim changes to TSRGD to allow for on street trials in 2013/14.

9. Speed awareness courses

Requested change:

- DfT to change policy to allow speed awareness courses to be offered to drivers exceeding the speed limit on 20mph roads

Context and expected outcome:

- Speed awareness courses are not currently offered to drivers who are caught marginally over the speed limit on 20mph limit roads. Drivers are offered an option to attend and pay for the course as an alternative to points and a penalty fine. In London last year 30,000 drivers attended a speed awareness course. The DfT are looking to review the effectiveness of driver diversion courses and London could pilot trials with the DfT.
- Greater enforcement of 20mph speed limits would increase compliance and reduce casualties;.
- An evidence based driver training alternative has not yet been devised or piloted. TfL is in discussion with ACPO and NDORS about such a development. ACPO are looking again to update their guidance on 20mph enforcement.

Timescales:

- Specific detailed discussions yet to begin.

10. Amend regulations in the Road Vehicles (Construction and Use) Regulations 1986 (DfT)

Requested change:

- DfT to include the requirement that all vehicles are to be fitted with approved close proximity sensors, additional visual aids to cover blindspots not solved by mirrors and a system to alert drivers of someone / something in their blindspot

Context and expected outcome:

- To improve vehicle safety to reduce the threat posed to vulnerable road users, in particular cyclists and pedestrians.

Timescales:

- Discussions already underway with the DfT on this subject
- Meeting held at the Department in May 2013. Discussions will be ongoing in 2013 (meetings TBC) with the Freight Policy Unit at the DfT.

11. Amendments to EC directives and approvals to improve the safety of commercial vehicles and cars in Europe

Requested change:

- Through EC Whole Vehicle Type Approval, all new lorries be designed with enhanced driver direct vision required and are fitted with additional visual aids to cover blind spots that cannot be addressed by direct vision
- Through Directive 2007/38/E, all existing lorries should be retrofitted with additional visual aids and close proximity sensors to cover the near side front blind spot that cannot be addressed by direct vision or by existing mirrors (i.e. through enlarged class V mirrors, Fresnel lens or camera system)
- Within Directive 89/297/EEC, all new construction lorries to be fitted with side guards through a review and tightening of the 'special purpose' exemption clause to fit lateral under-run protection

Context and expected outcome:

- Changes to the design of commercial vehicles operation in Europe will help to ensure that there are fewer blind spots on vehicles, in particular HGVs. This will mean drivers have improved visibility and will be more likely to spot cyclists and other vulnerable road users before an accident occurs.
- The fitting of additional safety equipment to commercial vehicles can also help to alert drivers to cyclists and pedestrians who may be in the vehicles blind spot.
- Making regulations around exemption for the fitting of certain safety features will also mean more vehicles are required to fit equipment such as side guards. Improving the testing of car front bonnets will help to ensure that they are as safe as possible and will help to reduce the seriousness of an accident with a vulnerable road user should one occur.

Timescales:

- Meetings have already been held in Brussels to discuss TfL's proposed changes with the European Commission. Sir Peter Hendy has also met with senior EC officers to highlight the need for change. There will be further meetings throughout 2013 on these issues.

12. Eyesight test requirements for commercial drivers

Requested change:

- DfT to fully adopt European directives regarding eyesight requirements for Group 1 and Group 2 drivers

Context and expected outcome:

- Increased driver standards would reduce the number of collisions and casualties in London.
- In May 2012 the UK eyesight requirements for a driving license were strengthened to include a Snellen scale test of visual acuity to comply with European directive 2009/113/EC. These changes brought the UK in line with the minimum level of eye sight testing requirements. Eyesight requirements are not due to be reviewed by the DfT again until 2017.
- Currently Groups 1 (cars and motorcyclists) and 2 (buses and lorries) drivers are required to self report their deteriorating eyesight to the DVLA. Many drivers do not recognise that their eyesight has deteriorated to a level below the required

standard (egg insurance estimate 1 in 7 drivers do not meet the required standards) and even when they are area of poorer eyesight they may be unwilling to volunteer this information and run the risk of losing their license.

- Regular testing of drivers would detect more cases of drivers not meeting the required eyesight criteria and reduce the number of collisions where vision played a contributory factor.

Timescales:

- Discussions with the DfT will be ongoing in 2013.

13. Driver Certificate of Professional Competence training

Requested change:

- Within Directive 2003/59/EC, introduce a mandatory road risk module in the existing Driver Certificate of Professional Competence (CPC) syllabus which should include minimising road risk presented to vulnerable road users, particularly in the urban environment

Context and expected outcome:

- Many drivers do not undergo training for conducting safe operations in the urban environment. There are no mandatory elements of the Driver CPC syllabus according to Directive 2003/59/EC, which states that training 'must include some of the subjects in this list.' A driver therefore can complete the Driver CPC qualification and receive no road safety training whatsoever.
- The Driver CPC syllabus according to the directive currently contains a section on Health, Road and Environmental Safety, but the objectives in this section focus on the risks posed to the driver and protecting the image of the company rather than the risks the driver presents to other road users during the course of his duties.
- Introduction of a mandatory road risk module in the existing Driver Certificate of Professional Competence (CPC) syllabus which should include minimising road risk presented to vulnerable road users, particularly in the urban environment. Specific road safety Driver CPC training requirements are included in TfL contractual requirements and these are also featured in all Crossrail contracts. TfL is working with operators accredited with the Fleet Operator Recognition Scheme (FORS), London boroughs and other public sector organisations to increase the uptake of this specific Driver CPC training

Timescales:

- This issue was raised with the European Commission on a lobbying trip in January 2013. There will be further discussions and meetings with officers at the EC throughout 2013 (dates TBC) where we will continue to push for this change to the DCPC syllabus.

14. Young driver learning and licensing

Requested change:

- DfT to improve young driver learning and licensing (including Graduated Driver Licensing, which is supported by the insurance industry, including the Association of British Insurers)
- Driver theory test to highlight cycle awareness.

Context and expected outcome:

- TfL have supported PACTS analysis on this subject.

Timescales:

- A DfT Green Paper is due in June 2013. TfL are already in discussions with the DfT to try and influence the contents of this paper. Discussions will be ongoing in 2013.

15. Ensure work related road safety is regulated in the same way as workplace health and safety – particularly for construction activity**Requested change:**

- The Health and Safety Executive, and others, to ensure that work related road safety is regulated in the same way as workplace health and safety
- An Approved Code of Practice on work related road safety is developed and published by the DfT in partnership with the HSE
- Reporting of Injuries Disease and Dangerous Occurrences Regulations (RIDDOR) is extended to include work related road traffic accidents and injuries
- Construction Management Plans include work related road safety in the same way they do workplace health and safety

Context and expected outcome:

- This was one of the key outcomes from the Construction Logistics and Cyclist Safety report published by TRL in January 2013.
- It was also a key recommendation in research commissioned by the Metropolitan Police in 2012 on Developing a National Standard for Work Related Road Risk.
- The outcome will ensure work related road risk is owned and incidents reported by those organisations and companies who generate vehicular traffic as part of their business activities.
- Principal construction contractors will take ownership of the work related road risk associated with a construction site through Construction Management Plans and as a result will manage this risk and reduce the frequency and severity of collisions.

Timescales:

- Sir Peter Hendy has held meetings with the HSE on this issue. TfL is awaiting a response to a recent follow up letter sent by Sir Peter further outlining TfL's ambitions.

16. Inclusion of cycle training in the National Curriculum**Requested change:**

- Department of Education to Include Level 2 Bikeability cycle training as part of the national curriculum to help children develop road awareness skills

Context and expected outcome:

- The inclusion of Bikeability cycle training on the National Curriculum will help to ensure that all children are given the opportunity to receive cycle training. This will help to improve cycle safety from a young age, raise awareness of safety issues and encourage more children to take up cycling.

Timescales:

- Specific detailed discussions yet to begin.

17. National digital speed limit map**Requested change:**

- DfT to produce an up to date **national** digital speed limit map to revolutionise speed management and information technologies

Context and expected outcome:

- TfL has committed to update a digital map of speed limits for all roads in London. This will provide an accurate source of information which can be used in in-car systems to advise drivers of the speed limit of the road they are travelling on, augmenting speed limit sign information and with the potential of removing the need for speed limit signs at some future point.
- Many fleet operators have fixed speed limiters (e.g. the post office limits many vehicles to 56 mph), however, the map could also be used by fleet operators seeking to dynamically limit speeds in line with the actual speed limit of the road.
- DfT have previously estimated the cost of this map nationally to be around £15 million. It is more likely that fleet operators and private motorists would adopt the use of speed limit mapping if the coverage is national.

Timescales:

- Specific detailed discussions yet to begin.

18. Enforcement of mandatory cycle lanes**Requested change:**

- DfT to create a commencement order to decriminalise cycle lane infringement, to give TfL the capability of enforcing them more effectively

Context and expected outcome:

- The power already exists, but the order to commence has not been signed off. Like bus lanes, we may want to consider retaining that the offence of parking or driving in cycle lane can be dealt with by way of a FPN by the Police.
- Fewer cycle lanes blocked by parked vehicles
- Road users not entering them illegally so reducing conflict with cyclists.
- This is a lobbying area as outlined in the Mayor's Vision for Cycling in London.

Timescales:

- Discussions to commence later in 2013/early 2014 with the DfT.

19. Alcohol ignition locks**Requested change:**

- DfT to introduce alcohol ignition interlock programme orders as a means of disposing of drink-drive convictions

Context and expected outcome:

- In July 2011 a memorandum to the Transport Select Committee on the Road Safety Action 2006 was published by the Secretary of State for Transport stating that "there are no plans to bring [this] section of the Act into force".
- Non mandatory avenues can also be considered - explore opportunities with fleet operators (commercial freight, sales fleet etc) for the introduction of alcohol ignition interlocks as standard practice.
- An alcohol ignition interlock programme is a programme which provides an alcohol ignition interlock for use by the offender, training in its use and other education and counselling relating to the consumption of alcohol and driving. A device is fitted to a motor vehicle with the purpose of preventing the driving of the vehicle by a person who does not, both before starting driving the vehicle and at regular intervals while driving it, provide specimens of breath in which the proportion of alcohol is likely not to exceed the specified limit of 9 microgrammes of alcohol in 100 millilitres of breath.
- Sweden trialled alcolock technology between 1999 and 2002 when 300 alcolock devices were fitted to commercial passenger and goods vehicles. As a result Volvo and Toyota now offer installation of alcohol interlocks in trucks as a dealership option in Sweden and the Swedish Road Administration (SRA) require that all the SRA's purchased or leased vehicles must now be equipped with alcohol ignition interlocks. More than 5000 company cars in Sweden are today equipped with alcohol interlocks and the number is growing rapidly. Volvo also now offer this device in private cars and have done so since 2007.

Timescales:

- Immediate dialogue with commercial operators to commence.

20. Traffic Orders: Simplifying the Process**Requested change:**

- DfT to introduce a more flexible approach enabling authorities to engage with those potentially affected by traffic management measures in an appropriate and effective manner.

Context and expected outcome:

- Significant sums are expended across Great Britain on advertising Traffic Orders (the majority being temporary orders) in newspapers (Northern Ireland have a more flexible and appropriate processes in place).
- DfT consulted on fairly well developed proposals to modernise the procedures between January and April 2012. A DfT decision on moving the issue forward is appears to have stalled.
- TfL alone expends £0.75m on advertising Traffic Orders (this covers both orders for utility companies, which are recovered and for the Roads Directorate), with minimal response from that source.
- The Minister, Norman Baker, has said that they are still reviewing this but no date has been given for when this review may report. TfL, along with both Joint Utilities Group and Highway Authorities and Utilities Committee, are continuing to lobby for more flexibility.

Timescales:

- TfL would like to see immediate action in this area and will be in discussion with the DfT throughout 2013.

21. Amend Statutory Instrument 1998 (2003) Road Traffic – The Road Vehicles (Authorisation and Special Types)**Requested change:**

- The current definition of Engineering Plant set out in Schedule 3 is amended to exclude vehicles delivering material on the public highway – such as volumetric concrete/cement mixers

Context and expected outcome:

- Volumetric mixers are large vehicle and can weigh over 40 tonnes. As they are defined as Engineering Plant they are not regulated in the same way that heavy goods vehicles are.
- These vehicles can be driven on the public highway with a category B (car) driving licence and by drivers who are not subject to driver hours regulations.
- The vehicles are not subject to heavy goods vehicle testing regimes and weight limits, other rigid vehicles are limited to 32 tonnes.
- Operators of these vehicle are not regulated by Traffic Commissioners and do not require and Operator 'O' Licence.
- In the interest of road safety and economic fairness, the outcome expected is that volumetric mixers designed for the public highway (and their drivers) are regulated in the same way as other construction industry heavy goods vehicles.

Timescales:

- Discussions already underway with the DfT on this subject.
- The Mineral Products Association has lobbied for this outcome since 2010 and has recently written to Stephen Hammond MP on 11 April 2013.

Greater London Authority and Transport for London

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