

Consultation response

1). London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.

Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.

1.1 As an inclusive cycling charity that champions the benefits of physical activity, we agree with the Mayor's assertion that there is an overdependence on cars in London. The current car-centric outlook of the capital contributes to higher levels of congestion, road danger and lethal levels of air pollution. This toxic combination of factors deters people from taking up cycling, including those least likely to cycle, such as disabled people (who, incidentally, as a result rely heavily on private car hire and taxis for travel - further aggravating the congestion and air pollution problem). As a solution to this, we support the Strategy's aim of better connected public transport services and the idea that these will link to other forms of active and sustainable travel, such as cycling and walking. Indeed, for disabled cyclists in particular, a seamless, door-to-door journey that integrates multiple modes of transport is often essential.

1.2 We welcome the Strategy's recognition of our ageing population and the need therefore to plan for increasing accessibility needs. Encouraging more disabled and older people to travel actively (including by walking/wheeling/cycling in comfort and safety) will be key to addressing the adult social care crisis and in reducing pressures on the NHS.

2). The Mayor's vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80% of Londoners' trips will be made on foot, by cycle or using public transport.

To what extent do you support or oppose this proposed vision and its central aim?

Strongly support

3). To support this vision, the strategy proposes to pursue the following further aims:

To what extent do you agree or disagree with the aims set out in this chapter?

“By 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day”

Strongly agree

“For no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041”

Strongly agree

“For all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London’s entire transport system to be zero emission by 2050”

Strongly agree

“By 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public”

Strongly agree

“To open Crossrail 2 by 2033”

No opinion

“To create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor”

Neither agree nor disagree

“To improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared to the full network”

Partially agree

“To apply the principles of good growth”

Strongly agree

4). Policy 1 and proposals 1-8 set out the Mayor’s draft plans for improving walking and cycling environments (see pages 46 to 58).

To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

4.1 We strongly support the Mayor’s ambition to increase the number of trips made by foot or cycle and to improve levels of physical activity. We agree that, combined, the Healthy Streets and Liveable Neighbourhoods approaches will undoubtedly help to create more cycle-friendly environments.

4.2 We are delighted to see a number of explicit references made to disabled cyclists in this Strategy. In particular, we are pleased to see proposals for on-street cycling facilities to cater for non-standard cycles (Proposal 1). Wheels for Wellbeing has provided expert advice to TfL on inclusive cycle parking previously, including on the cycle superhubs at Hounslow and Greenwich, and would be happy to do so again in the future, including on the development of this particular proposal.

4.3 We warmly welcome the Strategy’s call for all cycling space to be made sufficient for “groups, children and people using inclusive cycles”. Under-represented groups are most likely to be put off cycling by poor cycling infrastructure and road safety, so it is especially important that the Mayor honours this commitment. Indeed, according to a recent Wheels for Wellbeing survey, inaccessible cycling infrastructure was cited as the *number one* barrier to cycling for disabled cyclists. The list of physical barriers encountered by disabled cyclists is vast, but typically it includes things such as bollards that are placed too closely together, stepped bridges, anti-motorcycle barriers and kissing gates - all of which restrict the movement of larger cycles, such as tricycles and tandems. To ensure that cycling infrastructure does not impede non-standard cycles (which are used by many disabled cyclists, though not all), we would recommend that all London Boroughs be required to apply the London Cycling Design Standards’ (LCDS) ‘inclusive cycle’

concept when constructing cycling infrastructure. Adhering to these comprehensive guidelines will, in turn, ensure that Boroughs meet their obligation to disabled people as cyclists as part of the Public Sector Equality Duty (PSED) and Equality Act 2010.

4.4 Whilst we support plans to transform Oxford Street in principle, we would challenge any proposal seeking to ban cycling altogether: such a move would wrongly assume that all disabled people are able to access the length of Oxford Street on foot or have the strength to push a wheelchair along it (as well as walk/push through the shops). We know this is not the case and that many disabled people's mobility is only possible over long distances through the use of cycles as mobility aids (according to TfL's own statistics, as many as 15% of disabled Londoners cycle to get around, compared to 18% of non-disabled Londoners). Therefore, should the decision be made to ban cycling in part or in full from Oxford Street, we ask that an exemption be made for those disabled cyclists who use their cycle as a mobility aid. Our recommendations for Oxford Street (including a potential inclusive cycling 'shuttle service' for disabled people) can be found online [here](#).

4.5 We welcome plans for greater 'digital inclusion', including the possible development of apps that will help disabled people to plan cycling and walking journeys. However, we would urge the Mayor to go further and as part of this plan to call on TfL to develop an inclusive cycling map of London, based on reliable data and surveying - illustrating all fully accessible cycling routes in the capital, as well as those that contain barriers to inclusive cycling (e.g. where there are steps, narrow gates, bollards, excessive cambers).

4.6 We strongly support any measures taken by TfL to increase the number of e-bikes available as part of cycle hire schemes in London. According to a recent survey undertaken by Wheels for Wellbeing, 1 in 5 disabled cyclists use e-assist when cycling (in the form of e-bicycles, e-tricycles, e-handcycles etc.). We know that this technology has huge benefits for older and disabled people as it reduces the stresses and strains of a journey, whilst allowing for longer and more comfortable cycling journeys. E-bike investment will go a long way towards encouraging more older and disabled people to cycle, which will be of benefit not just to the NHS and adult social care, but to society as a whole. We believe that e-bikes are part of the solution for increased cycling amongst the general population, not just for disabled and older people.

4.7 Filtering is a desirable measure for increasing the number of 'healthy streets'; however, we would advise that where this is installed careful consideration is given to the needs of disabled cyclists. For example, in the case of bollards, it must be ensured that the width between each bollard is sufficient to allow non-standard cycles to pass (no less than 1.5m). Furthermore, anti-moped/motorcycle measures must include monitoring, CCTV etc., not barriers.

4.8 We would like the Mayor to commit to developing and rolling out a ‘Blue Badge’ scheme for disabled cyclists, which is needed for three reasons: firstly, to exempt disabled cyclists from having to dismount on footways or in ‘cyclists dismount’/pedestrianised zones; secondly, to permit disabled cyclists to cycle (considerately) in non-cycling areas; and thirdly to permit disabled cyclists to take their cycles (when these are mobility aids) onto other modes of transport (such as London Underground/London buses, within certain space considerations). According to a Wheels for Wellbeing survey, the majority of disabled cyclists (69%) find cycling easier than walking, with many using their cycle as a mobility aid, just like a wheelchair or mobility scooter (often this is because it reduces strain on the joints, aids balance and alleviates breathing difficulties). And yet, 1 in 3 disabled cyclists have been asked to dismount and walk their cycle, even though they were using it as a mobility aid. Typically, this occurs on footways or in pedestrianised areas, where mobility scooters are allowed but cycles and cycling are not. Asking a disabled cyclist to walk their cycle can be as discriminatory as requiring a wheelchair user to walk their own wheelchair instead of wheeling it in order to get to their intended destination (such as a shop, a train, a park etc.). Therefore, we would like to continue our work with TfL and the Met Police in developing and trialling a disabled cyclists’ Blue Badge. Such a scheme would put cycles on a level playing field with wheelchairs and mobility scooters, when used by a person for the purpose of a mobility aid, whilst encouraging more disabled Londoners to lead physically active lifestyles. What’s more, if designed correctly, a Blue Badge scheme could be used for multiple purposes (e.g. reserving cycle parking that has been allocated for non-standard cycles). We would also like the Mayor to lobby the government for the introduction of a national scheme.

4.9 Finally, and in order for more disabled Londoners to engage in cycling in the first place, we recommend that the number of inclusive cycling ‘hubs’ (where disabled people can find opportunities to try cycling on a variety of different cycles, away from the traffic and with the support of trained instructors) be increased – particularly in West/North West, North East and South East London – with resources and funding to match. This will support increasing numbers of disabled and older Londoners to discover or re-discover cycling and to have equal chance to make use of the increasing investment in good quality cycling infrastructure.

5). Policy 2 and proposals 9-11 set out the Mayor's draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67).

To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

5.1 As a charity that provides a voice for disabled cyclists, we are in favour of the Mayor's Vision Zero approach, including the lowering of speed limits. Fear of safety is the biggest barrier to cycling and is particularly so for those less confident on the road or those using wider/longer cycles who may be less able to swerve or jump away from the path of dangerous drivers. Therefore, we would like to see a 20mph speed limit enforced London-wide wherever this is possible.

5.2 We applaud the Mayor's concerted efforts to improve lorry safety, including the development of a Direct Vision Standard for HGVs. This measure is not only potentially life-saving for people on bicycles, but is particularly important for those cyclists who are lower to the ground, have a smaller visibility envelope and are less likely to be seen by lorry drivers, such as handcyclists and recumbent cyclists.

6). Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system (see pages 68 to 69).

To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system?

Neither agree nor disagree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

6.1 We are glad that the Mayor has pledged to prioritise hate crime on London's streets and on the public transport system. Disability hate crime is an experience that disabled people should never have to experience. However, according to a Wheels for Wellbeing survey, we have found that as many as 36% of disabled cyclists have encountered abuse or disability hate crime when cycling. This must not be allowed to continue. Action must be taken to prevent this, or any other form of hate crime, from occurring - it is a blight on society, and it is shameful that it is still happening in the 21st century.

6.2 We are increasingly concerned about a growing anti-cycling atmosphere on the streets of London, which impact on all cyclists, but is likely to deter disproportionately those for whom swerving/jumping out of the way of aggressive drivers is not an option.

7). Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).

To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

7.1 We strongly support plans to prioritise space-efficient modes of transport in order to tackle London's chronic congestion problem. As a member of the Beyond the Bicycle coalition (a steering group made up of disabled, family and freight cyclists), one solution we would propose would be to do more to encourage the use of cargobikes for last-mile deliveries, particularly in central London. Not only would such a policy generate good PR for companies, but it would offer a sustainable form of transport and give the environmentally-conscience consumer greater satisfaction, whilst, crucially, tackling congestion. Financial incentives and subsidies could be offered to those businesses that choose to shift their deliveries to cargobike, for example.

7.2 Alongside this, incentivising the use of cargobikes amongst families would provide an alternative, sustainable means of reducing congestion during the 'school run'. Not only does families' reliance on cars lead to greater congestion and air

pollution (the latter especially harmful to the health and development of young children), but it often results in dangerous driving and pavement parking – further exacerbating the situation. Thus, greater support and funding from TfL for ‘try before you buy’ schemes and cycle libraries, such as Hackney Family Cycle Library, would help to increase the number of family cyclists.

7.3 Of course, in order for either of the above policies to be achievable, it must be ensured that London’s cycling infrastructure is inclusive of all kinds of cycle, including cargobikes.

7.4 Wheels for Wellbeing recommend that, run in parallel, a policy to increase e-bike use and hire (particularly in hilly areas and Outer London) would also do a great deal to encourage more people to make longer journeys and commutes by cycle, reducing the need to use a car. Furthermore, e-bikes have the added benefit of extending the range of journeys that can be made by disabled and older cyclists, as well as cyclists carrying heavy loads/baggage.

8). Proposals 18 and 19 set out the Mayor’s proposed approach to road user charging (see pages 81 to 83).

To what extent do you agree or disagree with the proposed approach to road user charging?

Strongly agree

Please let us know if you have any comments you would like to make on the proposed approach and please also describe any other measures you think should be included.

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9). Proposals 20 and 21 set out the Mayor’s proposed approach to localised traffic reduction strategies (see page 83).

To what extent do you agree or disagree with this approach?

Strongly agree

Please let us know if you have any comments you would like to make on the proposed approach and please also describe any other measures you think should be included.

9.1 Though we support measures to incentivise residents to give up their car parking places (and reduce car parking in general), this must not be done at the expense of disabled car parking, upon which many disabled people rely. Further, we would add that all Boroughs outside of central London should apply the same rules for Blue Badge car parking and permit parking in resident’s parking bays (e.g. as is the case in Lambeth). This is particularly important so disabled drivers who wish to travel actively (for whatever part of any journey is realistic for them) can park without having to worry about finding scarce, specific Blue Badge spaces and access parks, specific stretches of footways or roads they know are reliably accessible to them. Current, inconsistent Blue Badge rules add stress to disabled drivers trying to maximise active travel opportunities.

9.2 We support plans to develop more cycle parking; however, as already alluded to, we would like to see a greater proportion of cycle parking put aside for non-standard cycles. Currently, the vast majority of cycle parking is intended for use only by standard two-wheeled bicycles (take the ubiquitous Sheffield Stand, generally spaced too tightly to fit a wider cycle and with no reserved spaces for disabled cyclists). There are other situations where cycle parking facilities may further exclude disabled cyclists: for instance, where parking is not located on ground level (and without lift access) or where accessing a parking stand relies on the user having the strength and dexterity to operate technology (e.g. hydraulically-assisted double-stacking racks). In both cases, a disabled cyclist may be denied the chance to travel actively because cycle parking provision at their destination is either hard to reach or physically impossible to use; not because they can’t cycle. Therefore, we propose a disabled cyclists’ Blue Badge scheme, through which disabled cyclists can use reserved specially designed and allocated cycle parking spaces. As a result, more disabled people will be likely to undertake longer cycle journeys, safe in the knowledge that sufficient, safe and secure parking is available at a given destination (similarly designed and reserved spaces should also be available for cargobike users). This is of particular importance given the additional monetary and practical value disabled cyclists attach to their cycles. Wheels for Wellbeing is happy to

provide expert advice to TfL on inclusive cycle parking – including on design, signage and positioning – as we have done so previously.

9.3 As already mentioned, whilst we recognise that filtered permeability is a desirable feature of road infrastructure, where it is installed it must not restrict the movement of non-standard cycles, which are used by many disabled cyclists.

10). Policies 5 and 6 and proposals 22-40 set out the Mayor’s draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).

To what extent do you agree or disagree that these plans would help London become a zero carbon city?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

10.1 We support the move towards Ultra Low Emissions Vehicles (ULEVs) as a general means of tackling London’s air pollution problem. However, a more creative and sustainable solution would be to increase investment in e-bikes, which not only have technology that helps commuters undertake longer journeys by cycle, but opens up cycling to a wider demographic. Nationally, we would like to see the Mayor apply pressure on the government so that more of the funds and subsidies currently available for ULEVs – including electric and hybrid cars – are also made available for the purchase of e-bikes.

11). Policies 7 and 8 and proposals 41-47 set out the Mayor’s draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).

To what extent do you agree or disagree that these plans would achieve this?

Strongly agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

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12). Policy 9 and proposal 48 set out the Mayor's draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling. (see pages 118 to 119).

To what extent do you agree or disagree that these plans would provide an attractive whole-journey experience?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

12.1 Providing an attractive, whole-journey experience is crucial to encouraging more disabled people to cycle, who often rely on multiple modes of transport to get around. Indeed, it is disabled people who are most likely to be adversely affected by a lack of integrated transport modes, as they already have to go to considerable lengths to plan a journey involving more than one form of transport. Therefore, in order for disabled cyclists to feel confident in completing a journey by cycle (and able to set off in the first place) it is essential that all forms of transport are integrated and made accessible. This means, for instance, ensuring that London buses, the Tube and Overground train services are able to accommodate (and permit) the storage of non-standard cycles onboard, when they are being used by a disabled person as a mobility aid. Similarly, lifts servicing the Tube and Overground should be able to accommodate the dimensions of a non-standard cycle. Once more, this is an example of where a disabled cyclists' Blue Badge could serve an important practical function (on existing London buses, we realise there is limited space, but features of the card scheme designed to accommodate mobility scooter users could be extended to disabled cyclists, as part of the disabled cyclists' Blue Badge scheme).

13). Policies 10 and 11 and proposals 49 and 50 set out the Mayor's draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).

To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport?

Strongly agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

13.1 Our only recommendation here would be that TfL staff training includes an element on inclusive cycling. This would not only raise awareness of inclusive cycling generally, but would ensure that staff working on TfL transport (both surface and underground teams) are aware of the needs of disabled people as cyclists including, for example, the fact that many disabled people use their cycle (including standard two-wheeled bicycles) as a mobility aid. We would also like to see similar training made available to the British Transport Police, where the Mayor is able to influence policy. Wheels for Wellbeing would be happy to assist in the development and delivery of any such training.

14). Policy 12 and proposals 51 and 52 set out the Mayor's draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).

To what extent do you agree or disagree that these plans would improve accessibility of the transport system?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

14.1 As highlighted already, it is important for disabled people that all transport modes are integrated and made accessible. To meet the needs of disabled cyclists in this regard, we would like to see the terms of Proposal 51 extended; specifically,

that considerations be made for the provision of storage space for non-standard cycles onboard London buses, the Tube and Overground. Many disabled people use their cycle as a mobility aid and so it is only right that disabled cyclists are afforded the same rights and provisions enjoyed by wheelchair and mobility scooter users. As one disabled cyclist told us in a recent survey, *“I would love to be able to go to places like Lea Valley... but can't take my trike on the train as it is not viewed as a mobility aid, as a mobility scooter would be.”*

14.2 Like all Deaf and Disabled People's Organisations (DDPOs), we look forward to a day when the Tube network is entirely step-free. Whilst we recognise that this is not always easy or achievable, we would like to see TfL make more progress in this regard. We agree with Transport for All's assertion that the Strategy could be bolder and more ambitious on step-free access, with interim targets. Likewise, TfL must commit to ensuring that lifts across the network are operational whenever a station is open and, when out of service, repaired as quickly as possible to avoid inconvenience for disabled passengers.

14.3 As an accompaniment to TfL's existing step-free Tube map, we would like to see the development of an inclusive cycling map of London, which would illustrate all fully accessible cycling routes in the capital (and could be co-produced alongside disabled, family and freight cyclists).

15). Policy 13 and proposals 53 and 54 set out the Mayor's draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed (see pages 133 to 137).

To what extent do you agree or disagree that these plans would achieve this?

Neither agree nor disagree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included

15.1 We echo Transport for All's call for separate spaces for wheelchair and buggy users, which would help to avoid any potential conflict between disabled and other transport users. We would also ask that, where additional space is provided for more

than one wheelchair user, it is considered that disabled cyclists (who use their cycle as a mobility aid) may also be granted permission to store a cycle onboard.

16). Policy 14 and proposals 55 to 67 set out the Mayor's draft plans to improve rail services by improving journey times and tackling crowding (see pages 140 to 166).

To what extent do you agree or disagree that these plans would achieve this?

Neither agree nor disagree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

16.1 We would like the Mayor to consider the development of a policy permitting disabled cyclists to store a cycle onboard Tube and Overground trains, when using it as a mobility aid - putting cycles on a level playing field with wheelchairs and mobility scooters. Similarly, we would ask that disabled cyclists be exempt from having to dismount their cycle on a train concourse, when using it as a mobility aid. Additionally if, in the near future, TfL is successful in taking over the running of London's suburban rail services, this would present an excellent opportunity to pilot, or roll out, a disabled cyclists' Blue Badge scheme on a new rail service - complimented with fresh training and guidance (assuming such a scheme has not been piloted before then).

17). Policies 15 to 18 and proposals 68 to 74 set out the Mayor's draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully-inclusive and well-connected public transport system. The Mayor's policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).

To what extent do you agree or disagree that these plans would deliver a well-connected public transport system?

Neither agree nor disagree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

17.1 As with the previous question, we would like the Mayor to ensure that disabled cyclists are not discriminated against when using London's riverboat, regional and national rail services, and are permitted to store their cycle onboard when using it as a mobility aid. Where reasonably practicable, we would ideally like the same to apply to coaches and taxi/private care hire.

18). Policy 19 and proposals 75 to 77 set out the Mayor's draft plans to ensure that new homes and jobs are delivered in line with the transport principles of 'good growth' (see pages 193 to 200).

To what extent do you agree or disagree that these plans would achieve this?

Partially agree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

18.1 We are generally supportive of the principles of good growth promoted in the Strategy, particularly the need for "inclusive, accessible design". Unfortunately, however, this does not always happen in practice. For example, new offices, leisure and commercial spaces are being built with little or no consideration for disabled cyclists; whether this be an absence of inclusive routes to them, no inclusive cycle parking with step-free and easy access, or no accessible showering facilities. Therefore, we would urge the Mayor to use all the powers at his disposal to ensure that where new buildings and facilities are built with the needs of cyclists in mind, they also cater for the needs of disabled cyclists (e.g. where reserved accessible car parking is built, there is reserved accessible cycle parking to match, also very close to the entrance of any facility etc.).

18.2 Where TfL does not have a say over the built environment, we would like to see London Boroughs working closely with building contractors and local disability groups to ensure that any new site (e.g. an office, gym, cycle parking facility) is built with the needs of disabled cyclists in mind.

18.3 In order to achieve the good growth principles of “efficient freight” and “car-free and car-lite places”, we recommend that subsidy and incentive schemes be devised to encourage businesses to use cargobikes wherever possible for their deliveries, particularly for last-mile delivery.

19). Proposals 78 to 95 set out the Mayor’s draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).

To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth?

Neither agree nor disagree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

19.1 As an inclusive cycling charity we are strongly in favour of the development of new, good quality cycling infrastructure; however, where it is installed it must always take into account the needs of disabled cyclists, following the guidelines set out by LCDS. For example, we are particularly impressed with a number of the cycle superhighways (e.g. North-South and East-West), which tend to be more accommodating and feature better visual signposting than many other forms of cycle infrastructure. We also have a preference for fully segregated cycle lanes where possible, which improve road safety and create a friendlier cycling environment that is more likely to attract less confident and more vulnerable types of cyclist. Whilst a cycling network built around the two-wheeled bicycle excludes many cyclists, a network which meets disabled cyclists’ needs is accessible by everyone else: two-wheeled bicycle users, as well as individuals, families and businesses who use tricycles, tandems, trailer cycles (tag-alongs) and cargobikes. Moreover, any measures enabling cycling by disabled and older people are likely to support a growth in cycling by novice cyclists, including children and young people. Indeed, an indicator of a well-designed, well sign-posted inclusive cycle network is the variety of users from under-represented groups using it.

19.2 Where new river crossings are proposed with the primary intention of boosting cycling and walking, we are in favour of them. However, as already stipulated, we

urge that such crossings are always designed with the needs of disabled cyclists in mind (e.g. avoiding the use of stepped bridges, installing lifts where needed and ensuring ramps and gradients are manageable).

20). Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249).

To what extent do you agree or disagree with this position?

No opinion

Is there anything else that the Mayor should consider when finalising his position?

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21). Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such as connected and autonomous vehicles (see pages 256 to 262).

To what extent do you agree or disagree with this proposed approach?

No opinion

Is there anything else that the Mayor should consider when finalising his approach?

21.1 We would suggest that any trials aimed at capturing the interaction between autonomous vehicles and cyclists are inclusive of disabled cyclists and other vulnerable cyclist groups, in order to gain a true reflection of all road users.

22). Policy 22 and proposal 102 set out the Mayor’s proposed approach to ensuring that London’s transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).

To what extent do you agree or disagree with this proposed approach?

Neither agree nor disagree

Is there anything else that the Mayor should consider when finalising his approach?

22.1 We are in favour of the ‘polluter pays’ principle and, as such, welcome the continuation of necessary measures like road user charging (e.g. Congestion Charge) as important sources of TfL funding. We are also pleased to see substantial capital investment being committed to the delivery of the Healthy Streets Approach, which is key to boosting levels of cycling and walking.

23). Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor’s approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).

To what extent do you agree or disagree with this proposed approach?

No opinion

Is there anything else that the Mayor should consider when finalising his approach?

23.1 We would like to see the LCDS be made mandatory for all Borough LIPs, rather than being guidance.

24). Are there any other comments you would like to make on the draft Mayor’s Transport Strategy?

24.1 We know that most disabled cyclists use standard two-wheeled bicycles; however, a significant proportion still use non-standard cycles. We are therefore

delighted that the Strategy features several good images of non-standard cycles - an element that has been missing from many previous TfL policy papers. This is a positive step towards a more inclusive cycling policy, which we greatly welcome. However, as with many other transport strategies, non-standard cycles have been portrayed here solely as cargobikes (with the exception of one picture of a recumbent), with non-standard cycles still very much in the minority. Whilst this marks progress, we would nonetheless like to see the Mayor do more to promote the visible recognition of disabled cyclists. For example, one simple way to achieve this would be to require all Local Implementation Plans (LIPs) - and any subsequent cycling strategies - to contain at least 1 in 5 images of cycles that are of a non-standard cycle, which would be proportionate to the number of disabled people in the UK – 20%. This would be a quick win for Boroughs both in terms of boosting the visual representation of disabled cyclists and meeting the requirements of the PSED, thus ensuring more disabled people see themselves as cyclists, or potential cyclists.

25). We have commissioned an Integrated Impact Assessment (IIA) on the draft Mayor’s Transport Strategy. The IIA evaluates the social, economic, environmental, health, community safety and equality consequences of the MTS’s proposed policies in order to ensure they are fully considered and addressed. The IIA has assessed the draft MTS as a whole; detailed assessment of specific schemes will be undertaken at a more appropriate level, such as assessment of Local Implementation Plans (LIPs) or at planning consent stage (where applicable).

We would welcome your views on the impacts that have been identified and whether you feel anything is missing?

25.1 We are not aware of any mention of disabled people as cyclists in the Integrated Impact Assessment. Rather, disabled people appear to be presented as either pedestrians, bus/taxi users, or car drivers. However, in order for LIPs to be compliant with the PSED and Equality Act 2010, any impact assessment of the Mayor’s Transport Strategy must ensure that the needs of disabled people as *cyclists* are taken into account. We urge that this be looked into before any final Strategy is published.