

## Consultation response

### 1. Do you have any suggestions on the way in which the current approach to development and maintenance of road signs and infrastructure impacts the safety of cyclists and other vulnerable road users? How could it be improved?

We welcome the government's ambition to make cycling 'the natural mode of transport even for a 12 year old'. It is vital that every effort be made to ensure cycling is accessible to all, including young, older and disabled people.

However, according to our [research](#), inaccessible cycle infrastructure remains the single biggest difficulty faced by disabled cyclists in the UK - many of whom use non-standard cycles (e.g. handcycles, tricycles, recumbents) for active travel. There are a number of ways in which cycle and road infrastructure prevents disabled cyclists from travelling freely, comfortably and safely. For example:

- Speed cushions - these can create unavoidable cambers which might cause three-wheelers (e.g. tricycles) to tip over. Cycling between speed cushions is the most stable solution, but this can force cyclists into dangerous cycling positions and out into the middle of the road.
- Advanced Stop Lines (ASLs) - disabled cyclists often need to generate greater momentum when setting off from a stationary/standing position. This is especially the case for those who are unable to ride out of their saddle or who power their cycle by hand. Cyclists who are lower to the ground (e.g. recumbent cyclists) often feel vulnerable at ASLs, whilst those riding wider cycles (e.g. tricycles) can find it difficult to filter over to an ASL, rendering it useless.

For a detailed list of space and essential features for disabled cyclists and accompanying technical solutions please refer to our Guide to Inclusive Cycling: <https://wheelsforwellbeing.org.uk/campaigning/guide/>

To ensure cycle infrastructure caters for the needs and safety of all types of cycle and cyclist, we recommend that all local authorities be encouraged to adopt Highways England's '[Cycle Design Vehicle](#)' blueprint (IAN 195/16) when designing, or outsourcing the design of, all cycle infrastructure. The refresh of LTN 2/08 provides a further opportunity for government to make reference to the Cycle Design Vehicle, a design criterion that captures all shapes and sizes of cycles.

We also recommend that laws be changed to permit the use of mobility scooters on cycle lanes, together with the creation of Dutch-style 'mobility lanes' (accessible by bicycles, non-standard cycles and mobility scooters alike). Developing inclusive cycle networks in this way could improve conditions for those using mobility scooters, which would in turn free up space on the footway and improve the experience of pedestrians, particularly those with sight loss. It would also enable better access for other users of non-standard cycles, including family, freight and cargo cyclists.

Finally, we would advocate for the development of national cycle design standards, which would ensure predictably inclusive cycling infrastructure is available nationwide - making cycling more appealing and safer not just for disabled cyclists, but also for novice cyclists, including children and young people, as well as older people.

**2. Please set out any areas where you consider the laws or rules relating to road safety and their enforcement, with particular reference to cyclists and pedestrians, could be used to support the Government's aim of improving cycling and walking safety whilst promoting more active travel**

Disabled cyclists are often at heightened risk and vulnerability on the road compared to non-disabled cyclists, for reasons that are also shared by many young and older cyclists, including:

- Being lower to the ground and less visible to car/lorry drivers (e.g. recumbent cyclists);
- Being unable to generate sufficient momentum to get ahead of car traffic from a stationary/standing position (e.g. handcyclists), which can be particularly problematic in hilly areas;
- Being slower, with a lower average speed (which [research](#) shows to be the main factor associated with 'near miss' experiences for cyclists in general).

It is crucial, therefore, that the police are especially vigilant and responsive to any potential threats posed to disabled cyclists. As one way of dramatically improving safety for disabled (and all other) cyclists, we would support a greater enforcement and rollout of 20mph speed limits in towns and cities across the country.

An additional measure that would help to improve the safety of disabled cyclists - and undoubtedly increase levels of cycling amongst disabled people - is for government to amend the Use of Invalid Carriages on Highways Regulations (UICHR) 1988 to recognise the use of cycles as mobility aids. According to our own [research](#) two-thirds of disabled cyclists find cycling easier than walking, with many using their cycle as a mobility aid (similar in a way to a wheelchair or mobility scooter). For many who use their cycle in this way, they often have no choice but to cycle short distances in non-cycling zones, such as in pedestrianised areas or train concourses. However, the fact that a cycle isn't currently recognised as a mobility aid means that disabled cyclists are frequently discriminated against, where they wouldn't be if they used a wheelchair or mobility scooter. This creates institutional barriers to active travel. Amending the 1988 Regulations to recognise cycles as mobility aids would have numerous benefits for disabled people as it would:

- Encourage greater active travel amongst a group of people who are twice as likely to be physically inactive;
- Reduce the number of disabled cyclists being unfairly penalised for cycling considerately on the footway, in a pedestrianised area or a 'cyclists dismount' zone (*1 in 3 disabled cyclists have been asked to dismount and walk their*

*cycle, even though they were using it as a mobility aid and despite the fact that, for some, it is physically impossible for them to do so);*

- Give police and enforcement officers clarity and consistency when engaging with disabled cyclists (*11% of disabled cyclists have been allowed to cycle in a pedestrianised area once they had explained that their cycle was their mobility aid, but this dependence on individual enforcers' understanding/lack of understanding can be stressful and may lead some to give up cycling altogether in order to avoid the risk of being arrested or challenged*).

As a complimentary measure to amending legislation on mobility aids, we recommend that government look into the piloting of a nationwide disabled cyclists' 'Blue Badge' scheme. Simply, this would give disabled cyclists a valuable form of identification, which could be used to allow disabled cyclists to cycle considerably in non-cycling areas when using their cycle as a mobility aid. Further details on how such a scheme might be designed and implemented are laid out in our Guide to Inclusive Cycling.

### **3. Do you have any suggestions for improving the way road users are trained, with specific consideration to protecting cyclists and pedestrians?**

As mentioned, there are several ways in which disabled cyclists may feel particularly vulnerable when mixing with other road users. By way of improving road users' awareness of the often additional needs and requirements of disabled cyclists, we would suggest the following measures:

- Official Driver and Vehicle Standards Agency (DVSA) hazard perception and practical driving tests to make reference to the needs of disabled cyclists
- 'Direct vision' lorries to be rolled out fully across the UK
- Cycle awareness training for lorry drivers to include a specific element on the needs of disabled cyclists
- Road safety training for police and enforcement officers to include a specific element on the needs of disabled cyclists
- Bikeability to increase its work with SEND schools and ensure that all young disabled children have the chance to cycle, and to provide opportunities for children to try out a range of non-standard cycles

Wheels for Wellbeing would be happy to assist in the development and delivery of inclusive cycle training for transport authorities and professionals.

**4. Do you have any suggestions on how we can improve road user education to help support more and safer walking and cycling?**

We would recommend that any public awareness and information campaigns related to road safety – including for pedestrians, cyclists and motor vehicle drivers – should include information about the needs of disabled people as cyclists.

**5. Do you have any suggestions on how Government policy on vehicles and equipment could improve safety of cyclists and pedestrians, whilst continuing to promote more walking and cycling?**

We are aware of the Government's ambitions for autonomous vehicles and continue to follow the Automated and Electric Vehicles Bill with interest. However, whilst the Government is quick to assure the public that autonomous vehicles are safe, we remain doubtful that the machine learning used in such vehicles is sufficiently advanced to predict and react to the impulsive movements of cyclists. At a minimum, we would urge that any prototyping of autonomous vehicles must involve user testing with all types of cycle and cyclist, including non-standard cycles and disabled cyclists, to ensure that – as and when autonomous vehicles are fit for the road – they have been programmed to account for the needs, movements and safety of every possible type of road user. It would be irresponsible to allow autonomous vehicles onto the road without having satisfied such basic requirements first.

One other consideration the Government should make is to increase investment in e-cycles. Not only would such a measure help boost numbers of disabled cyclists (a fifth of whom own a cycle that uses electric assistance), and in turn increase physical activity amongst disabled people, but it would also have the potential to improve the safety of all cyclists. This is because, as research has shown, those who cycle at faster average speeds are less likely to experience a 'near miss'; making the ability of e-cycles to maintain a constant speed appealing not just from a functional perspective, but also as a means of improving cyclists' safety.

**6. What can Government do to support better understanding and awareness of different types of road user in relation to cycle use in particular?**

We commend the Government for its recognition of disabled cyclists – including the fact that, for many, cycling is a valuable form of active travel – as highlighted in point 12 of this review's executive summary. We also welcome the Government's acknowledgement that for some a cycle might also be a mobility aid. This shows a good level of understanding within government as to the needs and rights of disabled people as cyclists, which we applaud.

However, whilst this recognition is greatly welcome, there remains a long way to go before disabled cyclists can claim to enjoy the same level of visibility (and rights) as non-disabled cyclists. For example, as our recent co-authored [academic paper](#) has shown, it is still the case that disabled cyclists remain significantly under-represented in cycling imagery and language which, in turn, reinforces the widely held assumption that disabled people don't (or can't) cycle. This misconception filters through to local government and results in widespread failures to ensure cycle infrastructure is fit for disabled cyclists.

We strongly believe that across the board, cycling language and imagery must be improved, by making it more inclusive, using more images of non-standard cycles and by actively acknowledging the fact that cycles are sometimes used as mobility aids. This will start a true cycling revolution by spreading understanding of the fact that everyone can cycle. Not only will this support disabled people who are already cycling, but it will lead many more disabled people to explore cycling as an option. As possible solutions, we would propose that:

- Public authorities be encouraged to ensure that at least 1 in 5 images of cycles depicted in cycling publications, strategies and reports are of a non-standard cycle - proportionate to the number of disabled people in the UK (20%)
- The term 'bicycle' be replaced by 'cycle' wherever possible in cycling-related and transport communications - ensuring that language around cycling is more inclusive
- The government commission further research into inclusive cycling and the needs of disabled cyclists