



Department  
for Transport

**Baroness Vere of Norbiton**  
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Sir Peter Bottomley MP  
Chair, APPG on Transport Safety

Ruth Cadbury MP  
Chair, APPG on Cycling and Walking  
House of Commons  
London  
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9 June 2022

Dear Sir Peter and Ruth,

I recently appeared at a joint meeting of the All Party Parliamentary Group (APPG) on Transport Safety and the APPG on Cycling & Walking at which members of the APPG requested further information on several of the points raised.

I promised to write to you with answers to the questions raised and have aimed to address the points below.

**What measures will the Government take to promote compliance amongst road users with the recent changes to the Highway Code and on what basis does it expect those measures to succeed?**

The changes to The Highway Code to improve road safety for cyclists, pedestrians and horse riders are not changes to the law. It is important to note that the rules already existed, and those alterations were simply an extension to the existing advice and guidance. The amendments are not expected to pose any major challenges as they simply reinforce the good behaviours that we would expect every road user to adhere to.

**When do you plan to publish the statutory guidance for local authorities regarding Part 6 of the Traffic Management Act 2004?**

The [statutory guidance for local authorities outside London on civil enforcement of bus lane and moving traffic contraventions](#) was published on the 31 May 2022.

**A 20mph speed camera in Plymouth caught 23,500 speeding motorists – before even being fully switched on, and 1100 in one 24 hour period (<https://www.itv.com/news/westcountry/2022-05-08/plymouths-first-20mph-camera-catches-thousands-of-speeding-drivers>). Will the DfT be encouraging the roll-out of speed cameras in 20mph zones?**

It is up to the traffic authority and the police to decide whether to install speed cameras and how they wish to operate them. This is a local decision in which the Department does not become involved.

**When will Active Travel England (ATE) start inspections and take any action against authorities not complying with LTN 120 and Gear Change?**

Since January 2022, Active Travel England has been operating in shadow form. During this time, it has been delivering a programme of reviews and inspections across a wide range of schemes funded from across government. This includes conducting over 30 detailed scheme inspections that identify critical design issues and which fail to deliver against the Department's Cycle Infrastructure Design Guidance (LTN 1/20). It is expected that no schemes proceed without resolution of critical design issues. To date, all local authorities we have engaged with so far have been very cooperative and have welcomed ATE support and involvement.

**What are ATE doing with regards to cycle lanes near tram tracks? (relating to cyclist incidents at tram tracks)**

The support provided by ATE to enable the delivery of high-quality walking and cycling infrastructure will include all elements of the Department's Cycle Infrastructure Design Guidance (LTN 1/20) including the design of cycle infrastructure on and around tram tracks.

LTN 1/20 provides advice on the interaction of cycling infrastructure with tram infrastructure. It recognises that tram tracks can pose a severe safety problem to cyclists using the carriageway either from skidding or cycle tyres becoming trapped in the rail grooves. It is therefore important that tram systems provide suitable routes and space for cyclists that are separated from the tram tracks. Where cycle routes cross the tracks, they should ideally be perpendicular, or at least 60 degrees to the rails. An absolute minimum of 45 degrees may be considered.

**Will The Transport Bill's provisions on automated vehicles (AVs) make it clear that when an AV is in a collision with a pedestrian or cyclist, the manufacturer of the AV and its operating system are liable to pay compensation for any injuries, unless they can show that the injured party was at fault - and are liable in any event if the injured party was a child or vulnerable person?**

Civil liability in automated vehicles is already addressed in part 1 of the Automated and Electric Vehicles Act 2018 (AEVA), which was created to ensure that victims (including children and vulnerable road users) of incidents involving such vehicles receive prompt compensation. AEVA created a compulsory insurance regime for automated vehicles so that the insurer pays compensation to victims. After paying compensation, the insurer has the right to seek compensation from other parties with liability in the incident, including the manufacturer. The Law Commission considered that the regime created by AEVA is appropriate for dealing with civil liabilities.

**Will the DfT consider back of bus advertising for active travel promotion, and to communicate the recent changes to the Highway Code? Could road safety messages be placed on petrol pump nozzles?**

We work with specialist media planners and buyers to secure the optimum and most cost-effective media placement for our messaging. The Highway Code campaign plan will use contextual opportunities, raising awareness at the point of the behaviour, as well as priming opportunities to diffuse tensions and build empathy and understanding amongst road user groups. Channels are selected that are able to build high levels of reach and frequency amongst the target audiences to deliver both message take out and planned behaviour change.

Both Petrol Pumps and Bus Back were considered as part of the Out Of Home mix, however they have been discounted over roadside 6 sheet formats which deliver better against the brief and offer increased flexibility in terms of digital targeting and creative opportunity. Digital out of home allows us to select panels in proximity to collision hot spots as well as select the most relevant time of day.

**Outside of London is there a requirement (or failing that guidance) to local authorities to specify that safe 'direct vision' lorries be used for any contracts involving lorries such as construction work, waste disposal or recycling?**

The Transport for London direct vision standard is their initiative to improve safety for vulnerable road users by improving direct vision for drivers of goods vehicles over 12 tonnes. The Government makes legislation on a national basis and our focus is improving safety requirements for all new vehicles.

There are no plans to introduce different requirements for driver vision on a city by city basis. The Government is actively considering the implementation of a range of measures intended to improve safety for all vehicles. The UK helped to establish these measures under the United Nations Economic Commission for Europe, and they include improved direct vision for drivers of vehicles weighing over 3.5 tonnes.

**Regarding pedicabs being able to operate outside of London, they are required to operate under the same legal framework as taxis. This makes it impossible in practice for pedicabs to operate on a ply-for-hire basis outside London, because the insurance and other requirements for taxis are so onerous and are disproportionate for addressing the potential risks. Even where local authorities have been keen to support local would-be pedicab operators, they have been unable to operate on a ply-for-hire basis, because the local taxi operators (who view them as competition) start asking questions about whether the pedicabs and their operators have the same insurance etc that they themselves are required to pay. Hence the reason for a Bill which would put forward a 'national' regulatory framework, rather than one which merely addresses the situation in London.**

The Transport Bill's provisions would aim to resolve the legal anomaly in London where pedicab drivers and proprietors operate unlicensed. This is in line with the Government's previous commitment in [response to the Report of the Task and Finish Group on taxi and private hire vehicle licensing](#) in 2019.

Outside London, licensing authorities can and do license pedicabs as taxis (hackney carriages) under existing legislation. For example, York City Council have pedicab-specific aspects of [its taxi licensing policy](#) and has designated pick-up ranks for licensed pedicabs.

The taxi and private hire vehicle licensing regime is essential for ensuring the safety of passengers and it is important that those providing such services to passengers have appropriate insurance. We encourage the pedicab industry to work with their local licensing authorities to enable pedicabs to operate safely.

**It is too easy to notify the DVLA of a change of circumstances which is an area for car fraud, how will this be addressed?**

The Driver and Vehicle Licensing Agency (DVLA) takes the accuracy of the vehicle register very seriously. It has a range of tools to ensure that applications are legitimate. These include checking for fraudulent documentation, document reference checks, addressing packages and vehicle identity checks. Services are kept under review and DVLA's counter fraud teams actively manage any threats in this area.

**Minimum standard for batteries – will this be included in Micromobility legislation?**

The Department is considering a wide range of technical requirements which might be necessary to ensure the safe use of Low-speed Zero Emission Vehicles, including elements relating to battery safety.

Thanks again for raising these questions, and please let me know if you would like any additional information.

Yours,  
Charlotte

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