



Nigel Harrop
National Secretary
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8th August 2015

To: Mr Robert Goodwill
Department for Transport
Minster House,
London SW1P 4DR

Re: Press Release – “More elite cycle racing to inspire new generations of cyclists” (27/07/15) & associated DfT “Summary of Responses to Consultation”, June 2015.

Dear Mr Goodwill,

TLI Cycling is one of the respondents to the “Cycle Racing on the Highway Regulation (1960) Consultation” in October 2013. Our response to Ruth Fagan at your Department was dated 11th October 2013.

Our organisation was delighted to participate in the Consultation. We took our work very seriously when preparing and contributing the response. Consequently we are very pleased to see that many of the proposals, which we supported, have been endorsed in your Press Release dated 17th July 2015, linked to the DfT “Summary of Responses to (the) Consultation”.

You have stated that “....*there is a great appetite for cycle racing in this country. We want to help inspire a new generation of cyclists, rather than act as a headwind....*”

TLI Cycling is a voluntary, not for profit, age-related cycle racing organisation with over 2,400 members. We encourage and support the promotion, by established cycling clubs, of over 400 events annually, most of which are held on the Public Highway. There has been a large increase in our membership since the Commonwealth Games in Manchester and the London Olympics. We feel we have made, and are continuing to make, a significant legacy contribution following the Games, and are playing our part in enhancing public health through exercise, and by participation in cycle racing competitions.

We have not requested, and therefore do not receive, any support from public funds, through either Sport England or the National Lottery. However, many of today’s top British professional cyclists, and other Elite cycling medallists, first experienced road-racing with TLI Cycling. Consequently, as we are an organisation that supports the promotion of competitive cycle races on the public highway, we are fully aware of the opportunities and challenges currently facing both race organisers and competitors.

TLI Cycling applauds the sentiments expressed in your Press Release.

In order to provide positive support for the smooth implementation of your intentions, we would like to raise your awareness of some of the challenges that remain within the detail of the Government Responses to the Proposed Changes to the 1960 Regulations: -

- The press release refers to large scale “Elite” events such as the Tour de France. However the proposed changes are more generally applicable to grass-roots amateur racing within England, including the small-scale, medium-distance races that TLI Cycling supports.

In general, under “Other Issues Raised” 2.26

- “....**a Code of Practice for cycle racing should be written in consultation with other interested parties**”.

Who are the other interested parties?

From an event promotion perspective there are a number of organisations in the UK, and three within England, who promote road racing events on the public highway.

In England these are TLI Cycling, the League of Veteran Racing Cyclists (LVRC), our partner organisation in the promotion of age-related cycling, and British Cycling (BC).

We would request that TLI Cycling and the LVRC, who are the sole providers of age-related cycle racing in the UK, are two interested parties who should be represented in any discussion regarding the proposed Code of Practice.

If we are not included there is a danger that our significant contribution to cycle racing, with the obvious enhancement to public health, could be marginalised by any other organisation with a vested interest in cycle race promotion on the public highway.

- **“....proposed Risk Based Approach....”**

There is a need to clarify what “a risk based approach” means.

If it is to centre on the Event Risk Assessment, then who will be considered competent to produce the Risk Assessment and what will be the criteria for acceptability?

If the Risk Assessment is produced by a “competent” person, and in accordance with the proposed Code of Practice, then why would there still be a need for the Police to have the power to refuse authorisation, unless there is an obvious and inadvertently overlooked safety case?

- **“The proper training of marshals is an essential aspect....”**

There needs to be discussion, clarification and guidance around what this “proper training” will look like and, in relation to a community based sports context such as ours, the avoidance of using a sledgehammer to crack a nut.

At present our races are marshalled by volunteers. Our marshals are only allowed to direct riders, and are not permitted to stop traffic. Historically this has not been an issue for us and we have an impeccable road safety record as can be evidenced by our Insurers.

Where a Risk Assessment requires more stringent traffic direction, CSAS (Community Safety Accreditation Scheme) trained marshals may be required by certain Police forces.

There is also a scheme being trialled by British Cycling, the full details of which we are not privy to, for the training of *Empowered Marshals*, which aims to provide a similar function. Despite repeated formal requests, British Cycling do not appear to be inclined to either share the training protocols for Empowered Marshals with our professional training providers, so that we can add to the pool of available marshals, or to make available to our organisation, the marshals that have been trained.

Additionally there appears to be confusion and uncertainty as to what type of marshal is acceptable and as to what statutory powers are needed, if any, to marshal a cycle road race.

More specifically within the body of the Government Response: -

5(1)(a)(i) Proposal 1

- There appears to be acceptance of the recommendation to remove all reference to the British Cycling Federation, but that organisation remains as a reference point for Police in 2.18 in Proposal 4, if the Police refuse authorisation.

Surely this should be the supporting organisation for the event, which could also be TLI Cycling or the LVRC. Again, if the event complies with the proposed “Code of Practice” why would it be necessary for police to impose further conditions or even refuse to authorise? This is currently a problem for all cycle racing organisations and we are able to provide our own concrete examples if requested to do so.

- **2.6** – TLI Cycling self-regulates the race field size to 40 or fewer competitors, but would support the possibility for other organisations to increase that number, in accordance with their own event risk assessments.

- **2.7** – Code of Practice. TLI Cycling requests to be included as an “interested party”, for all the reasons stated above.

- **2.8** – Please legislate for Sportives and leisure cycling separately. Sportives in particular are perceived by the general public as being the same as road races. They are not. This leads to ill feeling towards our legitimate races, which are not mass participation events, pass any given point quickly, and do not occupy public roads for a prolonged period of time.

5(1)(a)(ii) Proposal 2, Hours of Event Promotion – Agree with Government Response.

5(1)(a)(iii) Proposal 3, Length of Route / Circuit – Agree with Government Response.

5(1)(a)(iv) Proposal 4, Relaxation of Speed Limit Restriction – Agree with Government Response.

5(1)(b) Proposal 5, 28 Day Notice Period by the Event Organiser – Agree with Government Response but: -

- **2.21** - TLI Cycling would not have a problem with a longer notice period as our race calendar is complete by Jan/Feb each year.

8(1) Proposal 6, Appropriate Police Officer may impose conditions under Reg 6 or 7.

We are confused by the inclusion of this proposal as the need for Standard Conditions under Reg 5 appears to have been removed by the Government supported proposals above.

If the Standard Conditions have been replaced by the Code of Practice and a Risk Based approach, Reg 6 & Reg 7 appear to be no longer required.

If individual Police officers will still retain the power to impose additional requirements, and / or refuse authorisation, for any reason other than for self-evident safety issues, then the problems currently experienced by all cycling organisations, caused by the varying interpretations by Police of perceived risk, will remain.

In other words, with reference to the original Press Release, still more headwind than inspiration!

In conclusion, as stated in our response to the Public Consultation in October 2013, TLI Cycling aims to make a positive contribution to the debate around the implementation of the Amendments to the 1960 Regs, and also aims to continue to provide safe, competitive age-related, road races on the public highway.

As always, we are willing to contribute time, and considerable expertise, to these exciting proposals to safeguard the future of both high-level and grass-roots cycle racing on the public highway.

Please do not hesitate to contact TLI Cycling for further clarification of this letter, if necessary, or if we can be of any help in any way.

Yours sincerely,

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