

London Cycling Campaign

23 February 2016

The London Cycling Campaign is the capital's leading cycling organisation with more than 12,000 members and 40,000 supporters. We welcome the opportunity to comment on these plans and our response was developed with input from the co-chairs of our Infrastructure Review Group and from our local group Westminster Cycling Campaign.

The London Cycling Campaign is supportive of the intention to improve access and safety in the Baker Street area, and welcomes the level of engagement in the scheme shown by the local business community to improve the area for business staff, customers, users and residents alike.

That said, we are concerned that the scheme fails to address the key issues in the area for those already cycling and certainly does not enable those likely to cycle in the area if safe space was available to begin cycling. We also believe that there would potentially be support for a more radical scheme in the area from the business community – who increasingly are seeing a growing proportion of their staff, customers and users cycling into and through the area.

Several approaches could be possible – turning Baker Street into a bus-and-cycle only street along its length, with loading and delivery access retained largely through the side streets (similar in approach to the “West End Project” proposed for Tottenham Court Road and Gower Street) would potentially offer a dramatically improved retail environment, with wider pavements to cope with the very high pedestrian footfall on Baker Street, protected cycle tracks and two-way bus working. An alternative would be to retain one-way working on both streets but reallocate some space for protected space for cycling on both streets.

The current plans fail to consider safe space for cycling as a priority – and that will likely lead to further collisions between motor vehicles and cyclists in the area. This is likely because of Westminster Council – which has been very unwilling to creating safe space for cycling in this and other recent schemes.

The scheme as proposed originally, and in its amended form currently out for consultation, retains many “critical fails” on TfL's London Cycling Design Standards (LCDS) Cycling Level of Service (CLOs) and associated Junction Assessment Tool (JAT) matrixes. JAT “critical fails” are points where cyclists are at significant risk of being “hooked” by turning motor vehicles. These represent a high proportion of all vehicle-cycle collisions and cyclist fatalities. So they're particularly important to deal with appropriately and design out of any scheme.

In general, the London Cycling Campaign would like to see all schemes given a CLOs rating (as well as adhering to the latest London Cycle Design Standards) that demonstrates significant improvement from the current layout will be achieved for cycling, and that eliminates all “critical fails” in any proposed design before going to public consultation.

The modified scheme elements, currently out for public consultation, in this instance, score an estimated 39/154 on the JAT (a low score of 25%) according to our assessment. The modified scheme elements also feature potentially up to 22 “critical fail” turning movements with associated elevated risk of collisions, serious injuries and fatalities. Again, this is only assessing the newly-

proposed junction designs, not considering the many junctions that remain unmodified since the original proposal. The junctions that have not been further updated since the original proposal had already been raised as major concerns by both the London Cycling Campaign and our borough group, the Westminster Cycling Campaign.

Originally we had said: “Junctions along the route do not offer safe space for cycling. We are seriously concerned by the continuing risk of collision between cyclists proceeding straight ahead and other vehicles turning left at junctions for both cyclists riding along side streets as well as along Baker Street and Gloucester Place. There is further risk of collision when cyclists pass buses at stops and other vehicles stopped at the kerb at the times and places they are allowed to do so.”

We also said there was a “serious lack of continuity” of cycle lanes – including lanes only in effect at certain times, lanes interrupted by bus stops and car parking etc. And overall we viewed the failure to reduce traffic capacity needed to provide safe space for cycling as another major concern. These issues all remain unanswered.

In fact, some of the modified elements are worse for cyclists than the original scheme proposals. For instance, reintroducing the left turn for motor vehicles from Gloucester Place to Marylebone Road creates a major left hook risk and CLoS critical fail that was not in the original proposal.

As a result of the issues listed above, the London Cycling Campaign cannot give our support to the modified proposals put forward in the current consultation, nor to the original proposals of May 2015.

Until Westminster Council is willing to seriously consider the needs of cyclists in its borough, and in this scheme in particular, then a) it is likely there will be further fatalities and serious injuries to cyclists because of its designs (and failure to adequately protect and separate cyclists from fast-moving and heavy traffic), and b) it is likely Westminster’s streets will remain a barrier to uptake of cycling in London. We urge Westminster Council to think again to meet the desire of local businesses that their employees and customers – as well as and people simply passing through the area – can commute, shop or make other journeys safely by cycle.

Further comment on specific modified scheme elements:

1 Taunton Place, Gloucester Place junction

Numerous “critical fails”, with several arms of the junction proposing solely an ASL to cope with significant hook risks. And overly complex and conflict-ridden routing through the junction.

2 Ivor Place, Gloucester Place junction

The new design risks turning motor vehicles and turning cyclists coming into direct conflict. It’s clearly an inappropriate design for this location and likely includes at least one “critical fail”, if not two.

3 Ivor Place, Park Road junction

Removal of the two-way track is a loss for cycling. And we do not view increased motor vehicle permeability as a desirable outcome here. The parking bays proposed appear to have no “buffer”

zone. And the junction should separate cyclists in time and/or space from fast-moving, heavy flows of motor vehicle traffic. ASLs do not do this. Cyclists are also not enabled to turn left out of Ivor Place, for little reason.

4 Clarence Gate, Park Road, Allsop Place, Baker Street junction

Likely numerous critical fails for right turns and some left-hook risks also. Right turns are very difficult, and not enabled. And multiple stage pedestrian crossings are not ideal.

6 Gloucester Place, Marylebone Road junction

This junction features numerous “critical fails” – most notably, the modified plans introduce an extra one.

7 Balcombe Street, Marylebone Road junction

Several critical fails plus numerous banned turns for cyclists mean this element of the scheme has in no way been improved for cyclists.

8 Gloucester Place, York Street junction

In returning the scheme design to two-way working, the scheme introduces hook risks and at least one “critical fail”. Numerous banned turns that cyclists are not exempted from also appear to be an issue.