

London Cycling Campaign response to City of London Ludgate Circus experimental turn restrictions

12 November 2019

TraffOrder/DBE/CT-GL

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

General comments on this scheme:

- While we fully support improvements for safety for pedestrians at this currently too dangerous junction, the improvements proposed will risk increasing cycle-pedestrian conflict and reduce cycling facilities in the area. Instead, more should be done at this location for those walking and those cycling, at the expense of general motor traffic if necessary, in keeping with the City of London's Transport Strategy.
- That the current proposals go directly against the City and Mayor's own transport strategies is not just a concern regarding this scheme, but demonstrates a worrying drift away from the policies both the City of London and TfL profess to be enacting. Unless more can be done to ensure schemes like this prioritise walking, then cycling, above public transport and then freight, then private motor transport, it is unlikely either strategy will be realised.

Specific points about this scheme:

- The current proposals go against the City of London's own transport strategy and the Mayor's Transport Strategy on Vision Zero, Strategic Cycling Network and transport hierarchy policies.
- On the transport hierarchy, it is notable that the scheme provides turns for a bus route that is only in operation approximately twice an hour through the night, but not for cycling for all 24 hours. In the transport hierarchies both the City and Mayor have produced, cycling should be a higher priority to enable than public transport.
- The City of London's "Proposed core cycling network" includes both Fleet Street and Ludgate Circus (see <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/city-of-london-transport-strategy.pdf> p66) as to receive improvements "by 2035". Similarly, TfL's Strategic Cycling Analysis highlights both roads as on a corridor of "highest potential" for cycling in the Strategic Cycling

Network. It is therefore totally inappropriate to advance a scheme that not only benefits buses above cycling, but creates barriers to those cycling in the area.

- It is also worth highlighting in this context that while it is absolutely vital that City of London and TfL deal with the ongoing patterns of serious and fatal injuries to pedestrians at this location, the roads east and west of here also continue to see serious injuries to those cycling also, that this scheme does not even begin to prioritise or address.
- The proposals are particularly problematic for those cycling turning from Ludgate Hill onto New Bridge Street. There are simply not good quality routes available as an alternative nearby. And the proposal seeks to make no mitigation to those cycling in such a direction (or to those turning right from Fleet Street either).
- There is nothing in the consultation material to indicate any efforts to accommodate or even consider cycling turns onto the north-south Cycle Superhighway CS6 southbound. LCC suggested to TfL staff in September 2019 that two-stage (left and right) turn designs could be utilised here. That approach does not appear to have been considered at all, judging by these materials.
- Failing to provide high-quality, convenient alternatives, or clear measures to enable such turns at the junction for cycling, it is likely many of those cycling here will continue to make the turns now banned for them. This will likely create enforcement issues that could and should be avoided, and/or likely increase pedestrian-cycle conflict unnecessarily.

General points about infrastructure schemes:

- The Mayor's Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes must be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream and enable all ages and abilities to cycle, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which

promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.

- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all "critical issues" eliminated. Above 2,000 Passenger Car Unit (PCUs) motor vehicle movements per day, or 20mph motor traffic speeds, cycling should be physically separated from motor traffic.