

London Cycling Campaign

15 March 2016

Overall

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 our local groups Camden Cycling Campaign and Westminster Cycling Campaign, and in support of their consultation responses.

In general we support the principles of this scheme and its alignment, as well as much of the detail in this scheme. CS11 is a bold scheme that should enable modal shift to cycling, unlocking more journeys from a broader range of cyclists.

That said, we wish to raise a series of concerns regarding the scheme:

- Tracks should be a bare minimum of 1.5m in only the shortest and tightest sections. But wherever possible, as high flows of cyclists are envisaged here, tracks should be 2.2m or more ideally. This is to match LCDS medium or high flow cycle track suggestions and to enable comfortable overtaking for all-ages, all-abilities cycling. As an example, the tracks on Avenue Road at Swiss Cottage could easily be this wide.
- Cycle tracks should generally be located next to the pavement to enable easy transitions from cycling to parking and walking, with bus stop bypasses or other measures to ensure continuity.
- 20mph should be the default for the carriageway in this scheme – and wherever possible that should be physically designed for and enforced appropriately.
- Wherever possible, cyclists and pedestrians should not be unnecessarily delayed – straight-across pedestrian crossings and short waits at lights are key for pedestrian and cyclist convenience.
- The scheme urgently needs to be extended beyond Swiss Cottage to the north.

Finally, for this section, the London Cycling Campaign want 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. We would expect that this scheme is fully assessed (and modified as above) before it returns in detail form to public consultation.

Swiss Cottage

Again, we broadly welcome the principle of providing protected space for cycling through the gyratory, and removing the gyratory working. But again there are concerns – specifically that cycling is not easily enabled in all directions in these proposals.

- Turning from Finchley Road or Avenue Road northbound into College Crescent or Eton Avenue are complex manoeuvres – one involving crossing multiple lanes of heavy traffic (and likely incurring CLoS critical fails); the other involving moving onto shared use footway, then using signal crossings.

- Many turns remain difficult – particularly right turns that could be enabled with a well-designed two-stage right or other method. And in all circumstances, significant “hook” risks should be removed.
- As wide as possible a range of routes from, to and through the junction should be enabled. For instance, Hilgrove Road represents a key route from south Hampstead but features no cycling infrastructure to reach CS11. Finchley Road itself also will likely continue to feature high cycling flows, yet features no infrastructure likely to boost cycling numbers and significant CLoS “critical fail” hook risks retained at junctions.
- Cycles heading southbound from College Crescent need better protection to reach Avenue Road.
- Cycling southbound on Finchley Road before College Crescent, the feeder lane to the ASL will be difficult and likely intimidating to access. Cyclists should be routed via a bus stop bypass or some other method to the left of the buses.
- Junctions and routes that are not on the alignment of CS11 should still be made as comfortable and calm for cycling as possible (e.g. Hilgrove/Finchley/Adelaide and crossings and turnings at Adelaide/Avenue).

Avenue Road (north)

London Cycling Campaign policy is specific – to enable mass cycling, measures to reduce both motor traffic volumes and speeds to levels acceptable for sharing (below 2,000 PCUs) or high-quality protected cycle infrastructure are required. The concern is that Avenue Road will remain above 2,000 PCUs traffic volume and yet not feature high-quality protected infrastructure.

Therefore, if TfL traffic modelling shows Avenue Road will remain over 2,000 PCUs with the proposal, or if after the scheme is implemented traffic volumes remain over that threshold, further action will be needed.

Modal filtering may be required to bring traffic levels down – and ideally this would be done on an area-wide basis to ensure traffic doesn’t simply divert to other residential streets. Or, if more space can be squeezed from the design, semi-segregated tracks are an acceptable alternative – but semi-segregated tracks with the outside of the protection 1.5m from kerb are too narrow over this distance.

Sinusoidal speed humps or other physical motor vehicle speed controls along here would also be welcome and side roads and driveway treatments that emphasise the priority of cycle lane and pavement strongly (e.g. "Copenhagen" or "blended" crossings). But these should be done *as well* as other measures such as segregation or filtering, rather than instead of.

Avenue Road (south)

The same issues as Avenue Road (north) apply. Also, the junction at Prince Albert Road is an issue. For a very busy junction such as this, we would expect designs that enable cyclists to make all turning movements in comfort and safety and that eliminated hook risks on all arms – it's doubtful that this design does that well enough for cyclists travelling on Prince Albert Road – particularly those travelling eastbound, as traffic along Avenue Road is likely to be heavier than the traffic entering the park under the scheme.

On the approach southbound to the Prince Albert Road junction, it would also be advantageous to widen the cycle track/lane to ensure as many cyclists as possible can pass through the junction in one lights phase – thus future-proofing the junction for increased flows as the Cycle Superhighway becomes more well-used.

The Regent's Park

We broadly welcome the proposals for CS11 through The Regent's Park. The proposal to close the Outer Circle to through traffic is very welcome indeed – and represents a major shift of emphasis from motor vehicle traffic to pedestrians and cyclists – and will likely not just benefit commuting cyclists but all ages and all abilities of cyclist, including families enjoying the park and area. That said, we still have several concerns regarding the plans:

- Given access is maintained into and out of the car parks and to residential properties etc. opening the gates 11am-3pm daily is unacceptable. At the very least, these gates should be shut fully on weekends. But they should be shut at all times – to maximise the benefit for all cyclists and pedestrians, not just commuters during the peak hours.
- We also welcome designs to control the speed and aggression of remaining traffic. However, we are greatly concerned about the use of "setts". The raised tables proposed should be made from the same material as the rest of the carriageway (e.g. asphalt concrete). Setts have been used extensively across London on raised tables and their slopes and the results for cyclists, wheelchair users, vulnerable pedestrians etc. is uniformly problematic – they ice up easier, are often slippery in rain and require far more maintenance – invariably leading to them settling unevenly. If setts are used, the raised tables will be a barrier to a wide range of users. That said, we welcome the proposal to use speed camera enforcement. But we would push for a 20mph limit, rather than 30mph, throughout the park.
- Cyclists should be able to make key turns in comfort and safety at the junctions at Park Square West, Park Square East, North Gate and York Gate. There are some two-stage rights, for instance, enabled at Park Square East and none at Park Square West, but all key turning movements should be enabled – particularly the turns from Marylebone Road into Park Crescent.

Park Crescent and Portland Place

We emphatically reject the identical options proposed for Park Crescent. A 2m advisory cycle lane next to parked cars at this location is not adequate to offer safe cycling (particularly around the corner into/out of Portland Place), nor will this arrangement feel safe and so will act as a barrier to all but the most confident cyclists.

Creating space for segregated, stepped or semi-segregated tracks should be a priority on Park Crescent. This could be achieved by removing one side of parking, or by making Park Crescent one way. On top of either (or another) solution, speed control for driving is required, possibly with sinusoidal speed humps and/or a raised table at the junction with Portland Place.

On Portland Place itself, it's clearly unacceptable to offer advisory cycle lanes on a Cycle Superhighway. This will result in Portland Place remaining a significant barrier to cycling and a hostile and potentially dangerous environment to cycle in. We again emphatically reject option A as suitable for a Cycle Superhighway on that basis.

On option B, there is space for more than a 1.5m lane. Using semi-segregated measures rather than full segregation (which, given the parking here, would be suitable – as seen on Royal College Street in Camden) would free up significant amounts of extra space. Other space, particularly around the junctions, where 2m+ is vital to allow stacking and thus future-proofing the scheme for higher cycle flows, can also be found – for instance, narrowing the central pedestrian islands at the junctions and/or removing space from overly-wide vehicle lanes (e.g. at the Weymouth Street junction). Finally on this section, Portland Place and the roads crossing it are all very straight and long – more likely needs to be done to control motor vehicle traffic speeds throughout here.

Portland Place, Weymouth Street and New Cavendish Street junctions

At the Devonshire Street junction, safe and convenient turning movements for cyclists should be enabled in all directions (there are only three of four two-stage right pockets), and the ASLs on Devonshire Street are unlikely to provide enough protection to remove hook risks, and certainly are not a fitting level of infrastructure for a Quietway. Given New Cavendish Street is a link to a proposed Quietway there are also serious concerns about its design as a junction in these proposals. A significant northbound hook risk has not been dealt with, and the proposal does not, unlike other junctions nearby, specifically say that southbound cyclists cross "separately to general traffic". If this is not the case, more should be done to ideally provide that separation in time, or at the least, provide marking across the junction and as much separation physically from motor vehicle traffic moving ahead as possible.