

London Cycling Campaign

18 March 2016

<http://www.cityoflondon.gov.uk/services/environment-and-planning/environmental-enhancement/public-consultation/Pages/Fleet-Street-Area-strategy.aspx>

This response is made on behalf of the London Cycling Campaign, 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.

In general, the London Cycling Campaign want, 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 Fails" eliminated.

There is little doubt that this scheme not only retains "critical fails" (in terms of cyclists forced to mix in high volumes of traffic, with significant proportion of HGVs and hook risks at junctions) but also would not demonstrate significant improvement in its CLOS score from the current streetscape.

This scheme's strategy document says: "Proposals for Fleet Street and Ludgate Hill will be based on the successful Cheapside concept." Many cyclists have found the redesign of Cheapside hugely problematic (for example, see: <http://cyclelondoncity.blogspot.co.uk/2011/11/more-road-narrowing-coming-to-city-of.html>). Can the City of London confirm in what ways Cheapside's redesign has been successful for those cycling?

The document lists several key objectives at policy level for the City Of London. To wit: "Further modal shift to the most efficient (including space efficient) modes of transport, particularly walking and cycling... will be critical to ensuring that the City can continue to function efficiently" (4.4.1 City of London Local Implementation Plan 2011); and "The main challenge facing the City is to tackle the recent upturn in cyclist and motorcyclist casualties" (4.6.3 Road Danger Reduction Plan).

This scheme will not likely reduce collisions with those cycling, nor will it encourage modal shift to cycling. In fact, the implication is that by widening footways and reducing the carriageway to a single lane in either direction, sections of bus lane may be removed - slowing bus times through the area and removing one of the few refuges for current cyclists from the worst of the busy traffic.

While we agree that widening the footway is of benefit to the broader public – and may encourage increased pedestrian movements, which is to be welcome – it is utterly illogical to suggest that "widened and enhanced footways with less clutter and a consistent kerb line will... improve conditions for cyclists".

Buses will now be stopping in the carriage, encouraging those cycling to go round them into or between the bus and opposing traffic. And cyclists in such narrow, and congested carriageways, report that taxis and other smaller vehicles often attempt to squeeze past them. These issues will potentially be worsened by inset loading bays also – with cyclists squeezed between vehicles on either side.

Again, stating “the proposals to reduce the carriageway width on Fleet Street and Ludgate Hill will remove the current patchwork of cycle lanes and will encourage cyclists to use the main traffic lane; Advance Stop Lines for cyclists would also be provided where appropriate,” as a positive makes little sense. ASLs are widely recognised to not provide much in terms of safety gains, while encouraging cyclists “to use the main traffic lane” is a recipe for not encouraging any shift of modal share at a location this busy – and is likely a critical fail on CLoS to boot.

In the same vein, the proposals for the Ludgate Circus junction provides welcome direct crossings for pedestrians, but fails to facilitate turns in all directions for those cycling, and retains considerable left hook risks for those arriving at the junction from Fleet Street or Ludgate Hill.

On top of that, other issues to raise are the lack of inclusion of Fetter Lane and New Fetter Lane – both of which could do with further improvements for cycling and pedestrians. And, linked to that, we would support more modal filtering of the side streets in the City of London. South of Fleet Street we welcome the proposal to “increase footway widths where possible through part pedestrianisation of streets to allow for access and servicing only, raised entry treatments and raised carriageway areas where east-west courts and lanes and north-south routes cross.”

However, a modal filter on Temple Avenue (given Tudor Street is already closed) would likely remove any through traffic (many taxis use this area as a cut-through, for instance), while retaining servicing, delivery etc. access. Doing this would make these streets and alleys far more inviting for pedestrian and cycling access.

In summary, alternative proposals for Fleet Street that take into account the needs of cyclists are urgently needed. We would suggest either using some of the space removed from the carriageway to provide protected space for cycling (likely using semi-segregated measures in this area) on Fleet Street and Ludgate Circus. Another alternative could be removing through traffic from these streets. If bus routes are required, they can be catered for using a “bus gate” and perhaps, similarly to schemes in Nantes, with semi-segregated cycle tracks down the middle of the road with buses adjacent to the pavement for passenger entry/exit. Making streets one-way and thus freeing up space for cycling could be a third alternative.

We understand that traffic impacts of the East-West and North-South Cycle Superhighways nearby may also be a concern to the City of London, as they are currently unknown. If they are a major concern, the best thing to do with this scheme would be to delay further design work until the impact of those schemes on traffic is stable and then design a more appropriate scheme – both for all vulnerable road users, but also to match the actual vehicle, cycling and walking flows on Fleet Street after the Cycle Superhighways are fully in place.