

## London Cycling Campaign

10 March 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 HF Cyclists, and in support of HF Cyclists' consultation response.

We welcome the increased provision for cyclists at this hostile and dangerous location – particularly the improved and protected east-west route for cyclists. That said, we wish to raise several major concerns regarding the plans:

1. They do not go far enough – simply providing protected space for cycling east-west across the northern half of the gyratory fails to deal with three major issues:
  - a. The gyratory itself remains a major barrier to not just cycling but walking also. Huge numbers of pedestrians and public transport users access Hammersmith station and the shopping centre in the Broadway, yet these people remain effectively marooned in the gyratory with major pedestrian desire lines blocked or unfulfilled and motor vehicles still forming a barrier to movement.
  - b. The scheme fails to facilitate north-south movement for cyclists through the area, e.g. to Fulham Palace Road.
  - c. The scheme ends abruptly at both ends leading into streets that will remain major barriers to cycling. Unless these streets are also knitted into a broader network of safe and inviting cycling routes, this scheme will solely benefit current cyclists, rather than enabling many more journeys to be cycled.
2. Traffic capacity has been put at a higher priority than boosting cycling numbers or improving pedestrian access. TfL have clearly excluded options that impact motor traffic capacity to any significant degree. This has inevitably resulted in a series of compromises that have negatively affected the scheme for cycling. Unless TfL can prioritise cycling properly, it is unlikely to see the uptake in cycling from schemes that it needs to ensure London keeps moving. And that, simply, means being willing to remove some motor vehicle capacity in schemes like this – and use traffic restraint and evaporation, as well as improved facilities for other modes, to enable and encourage users to switch modes away from private motor vehicles.
3. Major design issues:
  - a. Due to the apparent placing of traffic capacity above cycling and pedestrian comfort and convenience, we are concerned about cycle and pedestrian signal timings. Cyclists should, for instance, be able to cross the Butterwick/Hammersmith Road island in one go. Certainly cyclists and pedestrians should not be delayed more than motor vehicles in moving through the area.
  - b. We are also concerned that some sections of the tracks look narrow. Without full design diagrams, it's impossible to tell for sure – but the eastbound segregated cycle track on King Street looks particularly narrow. It's vital for areas likely to receive high flows of cyclists, as this scheme likely will have, tracks are a minimum of 2m. And for comfortable and safe overtaking, to maximise track capacity, we would prefer 2.2m

wherever possible. The same issue also appears to affect the two-way track on Queen Caroline Street.

- c. Using a mandatory lane on Queen Caroline Street is simply not sufficient protection. When motor vehicle flows are over 2,000PCUs (they will be far in excess of that here), and/or there's a high proportion of large vehicles (HGVs, buses – again, will be the case here), then you must create safe space for cycling. This is likely to be an LCDS CLoS "critical fail" area unless you at least use semi-segregated measures here. Ideal would be a protected or stepped track that runs directly across Black's Road with strong design elements to control driver behaviour at the junction (e.g. continuous footway, raised table, very tight geometry).
- d. The spur roads off the gyratory are not adequately provisioned for cycling:
  - i. Far more cyclists currently ride eastbound on Black's Road, yet there is no eastbound provision for cycling.
  - ii. On King Street, cyclists riding eastwards face an incredibly tight (and narrow) turn at the gyratory that could easily be softened. Further, traffic reduction on King Street – making sections of it bus/cycle only etc. – could have real benefits here for bus passengers, cyclists and businesses.
  - iii. Beadon Road features no real facilities for cyclists – at a bare minimum, speed control measures such as raised tables and further emphasis on removing side road conflict (e.g. at Hammersmith Grove) should be considered. Cyclists coming off the gyratory onto Beadon Road also be designed for appropriately.
  - iv. At Shepherd's Bush Road there is also little design for cyclists joining or exiting the cycle track. And again, there seems little in the way of speed and behaviour control, or cycling facilities, proposed on Shepherd's Bush Road at present.
  - v. The current design around the island at Butterwick and Hammersmith Road is far from satisfactory. Any design that moves forward should include consideration for cyclists using Hammersmith Road. From HF Cyclists we understand that future plans might include a two-way track on the south side of Hammersmith Road. These plans would not be good for such a design, for instance. The exit onto Butterwick also sees cyclists moving into four lanes of traffic. An ideal solution would be to immediately remove a lane of traffic to provide a high-quality fully segregated track. Failing that, a shared use pavement running to the south here would be a far preferable interim measure until plans for the southern half of the gyratory advance than the current proposal.

Finally, and 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 being funded for construction, let alone public consultation.