London Cycling Campaign

18 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 Camden Cycling Campaign, and in support of their consultation response, and with input from our local Islington Cyclists Action Group.

We welcome the principle behind this scheme – to remove barriers to cyclists and pedestrians at this location. But we do not accept that simply returning all the roads in the gyratory to two-way working for motors achieves that. The result of the changes proposed would be a scheme that continues to be dominated by motor vehicle traffic to the detriment of all other users, and an area that remains a hostile, dangerous barrier to cycling uptake. The London Cycling Campaign, Camden Cycling Campaign and Islington Cyclists Action Group should, because of major concerns over this scheme, be included in regular meetings with designers and key stakeholders going forward.

The key principle behind any such large-scale junction(s) scheme in London should be to first and foremost create safe and inviting space for cycling and walking through the area, while secondarily ensuring traffic congestion does not become significantly more problematic than present – not the other way round.

At Kings Cross, this means providing better facilities for the high numbers of pedestrians – including better crossings and better pavements; and it means providing for cyclist desire lines through and in the area along key routes, and enabling as many other routes as possible too. Unfortunately, cyclists will see few genuine improvements under the current proposals.

There are already over three thousand cyclists travelling east-west along Euston Road (DfT, 2014) daily, demonstrating a clear desire line. Other roads nearby – York Way, Gray's Inn Road, Caledonian Road etc. – are also heavily used by cyclists north-south. These numbers are set to grow massively (as are pedestrian numbers) with both HS1 and HS2 coming in to the area, and as the Kings Cross "Knowledge Quarter" and other nearby developments come to fruition, and with the extension of the North-South Cycle SuperHighway into the area. So there is a clear and growing demand for cycling in and through the area. Making safe space for cycling is the most efficient way of easing demands on other modes and enabling the current clear demand for cycling to grow.

Leaving cyclists completely unprotected on these roads, as the proposal does, is therefore completely unacceptable. It is important to remember that there have been fatalities involving cyclists at the main roads here. Deep Lee, for instance, was killed at the York Way/Euston Road junction, while there were serious injuries to cyclists recorded on Euston Road, Pentonville Road, Caledonian Road and Gray's Inn Road in 2014 (TfL).

The current proposal uses quieter side streets as the sole provision for cyclists. It is important to enable cycling on quiet side streets – for local journey start/end points and to enable maximum permeability. Even here, however, this scheme looks unlikely to deliver – with many of the streets on the proposed routes featuring high volumes of traffic and not enough width to enable safe space for cycling.

On top of that, it is *also* vital to cater to cyclists along direct main road routes. Leaving main roads as barriers, while enabling back street cycling, has never been a proven formula for improving cyclist safety or numbers. And it shouldn't be proposed here.

Given this, and the width constraints and bus movements through the area, the likely answer is not just to return all gyratory roads to two way working for motor vehicles. We are therefore forced to reject this "in principle" proposal as it will not lead to major improvements for cyclists accessing the area.

Instead, we support Camden Cycling Campaign's proposal to prioritise cycling and bus movements through the area north-south and east-west using a combination of two-way roads, some retained one-ways and bus lanes and cycle lanes as well as modal filters to restrict through traffic to main roads. The result of these proposals is to create key north-south and east-west safe space for cycling routes, while retaining much of the traffic capacity through the area and the bus capacity and routes.

Camden Cycling Campaign's proposals are summarised below and in pictorial form here http://s3.amazonaws.com/lcc_production_bucket/files/10357/original.jpg?1458324415. We urge you to consider them as a far superior alternative to the current proposals:

- 1. York Way between Euston Road and Goods Way northbound bus and two-way cycle access only with protected space for cycling.
- Gray's Inn Road between Euston Road and St Chad's Street: westbound motor vehicle traffic from King's Cross Bridge onto Euston Road slip; no motor traffic from Gray's Inn Road onto York Way; bus lanes into westbound slip and southbound from King's Cross Bridge; protected space for two-way cycling across Euston Road into York Way.
- 3. Gray's Inn Road south from Harrison Street two-way for motor vehicle traffic with protected space for cycling in both directions.
- 4. Caledonian Road two-way motor vehicle traffic with southbound bus lane (excluding bridge), and southbound protected cycle track and separate cycle signals at Pentonville Road junction, to eliminate hook risks.
- 5. Pentonville Road between Caledonian Road and York Way eastbound one-way motor vehicle traffic with protected space for cycling in both directions.
- 6. Pentonville Road between Caledonian Road and Penton Rise two-way for motor vehicle traffic with protected space for cycling in both directions.
- 7. Penton Rise either two-way for motor vehicle traffic, or if two lanes vital use Weston Rise (if not, modal filter on Weston Rise).
- 8. Kings Cross Road from Penton Rise south two-way for motor vehicle traffic with a bus lane.
- 9. Kings Cross Road from Penton Rise to Pentonville Road westbound bus lane and protected space for cycling (at least from Lorenzo Street to Vernon Rise).
- 10. Kings Cross Bridge one way southbound motor vehicle traffic with two-way bus lanes.
- 11. Euston Road two-way motor vehicle traffic with bus lanes and two-way protected space for cycling.
- 12. Two-way protected space for cycling on Goods Way with two-way motor vehicle traffic if space (if not, eastbound motor vehicle traffic removed).
- 13. No right turn from Midland Road northbound into Pancras Road and Goods Way, and no right turn from Pancras Road into Goods Way.
- 14. Modal filters on Swinton street, Brittania Street, and Acton Street to remove through traffic between Gray's Inn Road and King's Cross Road.
- 15. Modal filter on Judd Street to remove through traffic and create space for cycling on the North-South Cycle SuperHighway.
- 16. Further filters or modifications to the one-way systems comprising Argyle Street, Belgrove Street, Crestfield Street and Birkenhead Street to continue to block through traffic and ensure traffic volumes remain very low.
- 17. Modal filter on Wharfdale Road.

18. Though potentially outside the scope of the current scheme boundaries, any changes will need to avoid negatively impacting on Copenhagen Street and Calthorpe Street for residents and as a vital east west cycling route. A modal filter would be ideal.

Finally, 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.