

A24 Epsom Road Cycle Safety Improvements

March 2016

<https://consultations.tfl.gov.uk/cycling/a24-epsom-road>

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 Get Sutton Cycling, and in support of their consultation response.

The A24 at this point is a major through traffic route. According to the DfT (<http://www.dft.gov.uk/traffic-counts/>), 12,000 vehicles daily including 300 HGVs travel along the A24 (as monitored near the scheme). The same road also is clearly a key potential cycling route between North Cheam and Morden. And London Cycling Campaign policy, as well as recommendation from TfL's London Cycling Design Standards (LCDS), is that above 2,000PCUs and/or above slow motor vehicle speeds, cyclists are physically separated from motor vehicle traffic. This is clearly what should be happening on the A24. That is not proposed in this scheme and therefore we must reject it outright.

What is particularly upsetting is that there appears to be space for cycling at this location – as a mandatory lane is provided in one direction, while in the other there is a wide bus lane. Without accurate measurements, it's impossible to accurately determine carriageway etc. widths. But it at least appears that this stretch of the A24 has enough width, particularly if the central reservation were removed, to provide for physically separated tracks, a bus lane and motor vehicle lanes.

Bus lanes on their own may provide some improved safety and comfort for existing cyclists. But as is demonstrated here, all too often they stop when needed most, and they do not provide facilities likely to encourage uptake of cycling among those currently too scared to cycle. Bus lanes are, of course, often also motorbike, taxi, private hire vehicle etc. lanes.

The junctions in this scheme also fail to offer a safe, convenient or comfortable cycling environment – and likely feature multiple “Critical Fails” under the LCDS Cycling Level of Service (CLOS) and Junction Assessment Tool (JAT) matrixes. Motor vehicle turns into and out of Lower Morden Lane are clearly designed to happen at speed, while nothing has been done to enable turning those cycling to turn right in either direction easily or safely. In the same vein, the approach to Central Road clearly demonstrates any willingness to tackle the most hostile junctions for cycling. ASLs are not even a suitable safety feature for such a large junction, let alone a feature that would tempt those who currently do not cycle.

Schemes should also never be considered in isolation – what routes and links does this scheme create? Likely none, bar the Greenway crossing near Rutland Drive, that is already in place. Instead, the entire stretch of the A24 from North Cheam to Morden should be considered at once – with the “hardest” sections designed first, then funding should be sought and found to create the entire route.

Moving from the larger scheme elements to the smaller detail, there are still serious concerns the design of this scheme raised:

- Interrupting cycle lanes for bus stops will force those cycling out into general traffic. This is a complex, daunting and risky manoeuvre. Bus stops should be designed to allow cyclists to pass without having to ride out into traffic. Bus stop bypasses are the ideal for medium-to-high pedestrian flow locations, bus stop boarders may be suitable at very low footfall locations.
- Parking bays should not, in general, be located between cycle tracks and pavement – as this introduces more conflict points. Instead, parking bays should be located between track and carriageway (with an appropriate “door” buffer zone). This provides extra physical protection to cyclists.
- Both the traffic islands north and south of Lower Morden Lane may introduce “Critical Fails” on carriageway width.
- The side roads in this scheme should feature little motor vehicle traffic – so “blended” crossings may be suitable to be used, running the cycle track and pavement across the junction mouth. But a raised table at each side road mouth should be a bare minimum.
- Shared space is not an ideal solution for this kind of area and represents a hostile barrier to cycling uptake – as does having to negotiate two-stage essentially pedestrian crossings. A direct crossing, in a “tiger” layout, to enable cyclists and pedestrians to access Morden Park, would be far preferable; with tracks running up to the crossing and a facility then for cyclists to turn right onto it.

Finally, and 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.