London Cycling Campaign

17 March 2016

QW7 Elephant & Castle – Crystal Palace

West Dulwich

Overall

Do not support

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 and is in support of the response of Southwark Cyclists and Lambeth Cyclists, our local groups.

We welcome the theory of Quietways targeting less confident cyclists who want to use low-traffic routes, while also providing capacity and maximum route choice for existing cyclists. We also welcome the Mayor's vision for Quietways that are direct, designed as whole routes, segregated from motor traffic where they briefly join busy roads and make use of "filtered permeability" that restricts through motor traffic etc.

Sadly, our assessment based on the first routes to reach public consultation is that Quietways thus far fail to fulfil these ambitions to the degree needed to genuinely boost cycling numbers. In these schemes, we again see some minor positives, but the big issues largely not tackled. So while welcome the much-needed investment and funding in south London to improve cycling, and the principle of a key north-south Quietway through this area, we would seek further discussions with TfL and other stakeholders to consider alternative route options and further improvements to the scheme.

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.

London Cycling Campaign policy, which echoes Dutch cycling design policy, and is also similarly enshrined in LCDS and CLoS, is that streets which feature more than 2,000PCUs daily are not suitable for quiet routes where cyclists share space with motor vehicles. This is what is proposed for several streets in this section of the Quietway – including Turney Road.

Therefore, we cannot support these proposals unless motor traffic flows on these streets are dramatically reduced to well below the 2,000PCU target, or protected and safe space for cycling is included in the designs.

Our preferred approach would be modal filters at key points along the route to remove through traffic. However, this approach only works well when modal filters are considered on an area-wide basis as a "cell" taking into account any likely traffic displacement onto other nearby residential streets, as well as existing through traffic issues on them.

On top of issues of traffic flow, there are also numerous other problems with these Quietway sections, including likely CLoS "critical fails" at junctions. As a result these proposed Quietway sections will not likely result in increasing cycling numbers in the area, nor will they enable the target market for Quietways to start cycling.

Turney Road

Do not support

This is a busy road with traffic levels likely well above the 2,000PCUs threshold above which London Cycling Campaign would require safe space for cycling to consider a scheme on. This is not a "quiet" street fit for a Quietway, then. So for us to support this scheme, either traffic must be reduced significantly, to below 2,000PCUs daily, or safe and protected space for cycling must be included.

Given how busy this road is, and how busy Croxted Road is, the junction of the two will remain a significant barrier to the stated target market for Quietways, and in fact all cyclists - with hook risks retained, especially for those cycling southbound. Depending on traffic levels and HGV/large vehicle mix, this may be a CLoS "critical fail". This junction must be redesigned to enable cycling through the junction in all directions, with all turns, in convenience, comfort and safety.

On Rosendale Road we would like to see pedestrian pinch points replaced with other, more cycle-friendly infrastructure – a zebra crossing, raised table etc. We welcome the junction design of Rosendale Road and Turney Road and the "blended" crossing at Dalkeith Road.

If there is room for advisory lanes on Turney and Rosendale Roads, then there should be room for semi-segregated measures or stepped/hybrid tracks, if traffic flows are not to be significantly reduced.

Rosendale Road/Lovelace Road

Do not support

We welcome the cycle bypass at the pedestrian pinch point going northbound, but we are concerned that travelling southbound, this pinch point will be a CLoS "critical fail" on carriageway width, with vehicles likely to drift into the advisory cycle lane.

Again, either reduce traffic capacity, or swap advisory lanes for protected space for cycling.

Rosendale Road/Thurlow Park Road Junction

Do not support

This is a junction between two busy roads (one is the south circular). As such, it retains numerous concerning features that ensures it will remain a barrier to cycling, and in particular to the kind of cyclists the Quietways programme is meant to target.

ASLs and early release signals, particularly on a junction this busy, do not provide strong enough protection, or perceived safety. These measures offer no protection to cyclists arriving at the junction during the green phase, and without long lead-in lanes (on Thurlow Park Road), they will not be easily accessible by cyclists during a red phase either, most likely. As such, we cannot support these proposals as they may well include CLoS "critical fails" via the hook risks.

We also welcome the provision for cycling right turns, but remain concerned about TfL's design of "two-stage right" facilities in terms of design clarity, safety of waiting area and lights phasings being convenient for cycling. Alternatives, including "Cycle Segregated Junctions" (http://lcc.org.uk/pages/better-junctions) should be considered.

Rosendale Road shops

Do not support

We welcome the inclusion of "blended" crossings in general terms, although experience in Waltham Forest and other locations has led to the following principles for these: they should only be introduced where the side street has very low traffic; and the junction should be tightened (ideally to a single lane width) with physical measures to ensure cars cannot turn in at speed. We also welcome the replacement of pedestrian refuges, that act as pinch points – increasing conflicts between those driving and cycling – with a raised table zebra and sinusoidal speed humps.

Again, however, without measures to reduce traffic flows on this street, or protected space for cycling, it's highly unlikely this Quietway will enable significantly more people to cycle this route than currently already do, and will fail to deliver benefits for its stated target market.

Park Hall Road/Rosendale Road junction

Do not support

We welcome the conversion of the roundabout to a crossroads with priority for Rosendale Road. However, beyond Mynton Road, the retention of current vehicle parking arrangements removes even the advisory cycle lanes. Again, this is an utterly unacceptable level of provision for a Quietway, particularly given how busy Rosendale Road is and that it includes a bus route. Again, either traffic flow has to be curtailed, possibly with a "bus gate", or safe space for cycling has to be designed in.

Tritton Road/Rosendale Road

Do not support

This junction would be worse for cycling under these designs. The design of the bend into Tritton Road looks like it could well include a CLoS "critical fail" on width, and certainly this design worsens turns for those cycling. The presumption is that this is being done for the 322 bus – but it's not appropriate for a Quietway design to improve street design for a bus route at the expense of cycling.

Again, Rosendale Road should have measures to reduce traffic flow or introduce safe space for cycling on in order to ensure the route enables more cycling journeys, particularly among the stated target market for Quietways.

Gipsy Hill Sections

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On top of issues of traffic flow, there are also numerous other problems with these Quietway sections, including likely CLoS "critical fails" at junctions. As a result these proposed Quietway sections will not likely result in increasing cycling numbers in the area, nor will they enable the target market for Quietways to start cycling.

We believe this section of the Quietway would likely be improved by routing differently and would welcome TfL and Lambeth council working with stakeholders including Lambeth Cyclists, Southwark Cyclists and the London Cycling Campaign on this idea.

Clive Road/Hamilton

Partially support

Changing the priority of this junction to follow the alignment of the Quietway is welcome, but there is a concern that the width of the carriageway through the bend might be between 3.2 and 4.0m, constituting a CLoS "critical fail". Also, rather than artificially narrowing the carriageway, other ways to control the speed of drivers making the turn might be welcome or providing safe space for cycling on the bend.

Paxton Place/Gipsy Hill

Not supported

This section of the scheme is not acceptable and should be redesigned. Using Paxton Place would mean routing cyclists down a narrow, circuitous and isolated section of alley, against traffic flow (often including vans), with no protected space. This would be hostile for cycling – and particularly at night.

Hamilton Road as an alternative has too much traffic and its junction with Gipsy Hill is too congested. So an alternative route at this point is required, or other measures to deliver a genuinely "quiet" Quietway routing through this area.

The crossing of Gipsy Road as currently designed is also unacceptable. It involves a snaking cycle track through shared use space and also right turn pocket at the run-up to the roundabout. These two elements are unclear and inconsistent and both involve complex routes across the junction. The link to the Paxton roundabout should also be improved, as should designs for those cycling through the roundabout also.

Gipsy Hill will see cyclists squeezed between parked cars and a bus at the stop – again, far from an ideal arrangement.

Gipsy Hill

Not supported

While the 2m cycle lane uphill is welcome, there are several issues here. Firstly, the lane does not begin until Oaks Avenue. Secondly, 2m is a good width – but making this an advisory lane will mean it will not attract more cyclists. At the bare minimum, this should feature semi-segregated protection.

It also may be that downhill cyclists are effectively placed in a carriageway in the 3.2-4m "critical fail" CLoS width. Obviously, this must be designed out if it is an issue. And, again, Gipsy Hill is currently too busy for a Quietway. Either traffic flows need to be reduced, or protected space for cycling should be enabled in both directions, or alternative routes should be considered.

Potentially a better option all round would be to create an off-road path across the open space between Gipsy Hill and Dulwich Wood Avenue (although this would potentially have issues with usage at night). Another alternative would be to take the proposed path across the south edge of the roundabout, then join Dulwich Wood Avenue.

If the routing is not changed, work is needed further south at the borough boundary – as the junction of Gipsy Hill and Dulwich Wood Avenue is a collision hot spot and again the area is far too busy for a Quietway.