

London Cycling Campaign

9 February 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 in support of our local Westminster Cycling Campaign group and with input from the co-chairs of our Infrastructure Review Group.

We welcome the theory of Quietways targeting less confident cyclists who want to use low-traffic routes, while also providing for existing cyclists who want to travel at a more gentle pace. 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. This is the case with too many sections of this Quietway.

So, while we support the principle of a direct cycle route along this alignment, avoiding major roads, we wish to raise several serious concerns regarding this route and the detail associated with it:

Cleveland Street – we believe more could and should be done to ensure this street is appropriately quiet for all ages, all abilities cycling. Modal filters would be an ideal solution, or opposing one-ways, that would remove through traffic – which is much of the traffic on this street.

At the least, more should be done along Cleveland Street to facilitate movement for cyclists including: reworking the junction with Clipstone Street to enable westbound cycling, and to reduce likely conflicts. The route should also continue northwards towards Regent's Park etc.

The carriageway on Cleveland Street should also be reduced to match the 3m it is at its narrowest points to give more space to cyclists riding in the contra-flow lane. The lane could also then be further protected as a "hybrid" or "stepped" track, or "semi-segregated" protection. And increasing the width of the track would be more inclusive design for a wider range of cyclists.

As well as this, the carriageway should feature raised tables at junctions and/or sinusoidal speed humps to appropriately slow traffic in the carriageway. Certainly, the carriageway should at no point be a width between TfL's "Cycling Level of Service" "critical fail" parameters of 3.2 and 4.0m. Sections of Cleveland Street are.

Mortimer Street junctions – the double junction and brief stretch on Mortimer Street are a fundamental barrier for a Quietway. This road is simply too busy and aggressive for likely Quietway users. As well as ensuring all turning movements for cyclists are separated in space or time from motor vehicle traffic to avoid "hook" collision risks and aggressively near passes (on all arms – to/from Cleveland Street, to/from Berners Street and those turning from/into either to/from Mortimer or Goodge Streets), the advisory lanes on Mortimer Street are completely unacceptable – a minimum should be semi-segregated tracks here.

Berners Street – parking seems to have been prioritised over cyclist safety, convenience or comfort. 1.5m contra-flow tracks are too narrow, while again, "critical fail" widths for the main carriageway are in evidence. Removing parking bays and/or ensuring an appropriately slowed and narrowed

main carriageway width would result in far better conditions for cyclists. The uncontrolled crossing of Eastcastle Street also represents a failure to adequately quieten a Quietway.

Oxford Street junction – again, has enough to be done to ensure cyclists turning from/to Oxford Street are protected from hook risks from motor vehicles? And are cyclists able to make turns onto and off the Quietway, and Oxford Street?

Wardour Street – this route is in no way appropriately quiet for a Quietway. Wardour Street features high through traffic flows, often travelling at speed. Yet the proposals include no real protection or proposal to remove through traffic. Modal filters should be seriously considered here, or other ways of removing most if not all of the through traffic here. At the very minimum, the protected track seen just north of Shaftesbury Avenue should be continued to Oxford Street (and that track should be 2m). Also, how well enforced are traffic regulations at the southern end including the currently pedestrianised area? If this area is not well enforced, then obviously it will also fail to be an adequately quiet section to cycle through for a Quietway. We would also support proposals to exempt cyclists from restrictions on Lisle Street also.

Shaftesbury Avenue junction – again this should be designed and phased to avoid hook risks and allow less confident cyclists to pass through the junction without facing conflict with motor vehicle traffic.

Whitcomb Street – for an appropriately quiet Quietway, the ideal would be to use modal filters or other measures to stop through traffic from using this narrow street, and/or to reduce traffic volumes. That said, we recognise this is one of the lower traffic volume streets in the scheme.

Trafalgar Square – the measures proposed around Trafalgar Square are simply unacceptable for a Quietway and represent a major barrier in the plans. The crossing of Pall Mall East will not allow less confident cyclists or younger cyclists to cross realistically – given the heavy and aggressive traffic flows that currently dominate this road. The proposal to share pavement with pedestrians around the Square itself, and potentially have to dodge parked cars also, is similarly unacceptable. Either alternative proposals should be put forward, or motor vehicle space (perhaps the parking space?) should be given to pedestrians and cyclists to deal with this issue.

Cockspur Street/Spring Gardens – the crossing of Cockspur Street risks putting pedestrians and cyclists into conflict at a high-flow location. Worse, the uncontrolled crossing into The Mall from cyclists exiting Spring Gardens will feel hostile and be complex – again, hardly appropriate design for a Quietway. Reorganising the use of motor vehicle traffic through Admiralty Arch could conceivably deal with this issue. Further work will also need to be done on The Mall to ensure cyclists are appropriately separated from motor vehicle traffic until they join the Cycle SuperHighway and Quietway.

Storey's Gate/Victoria Street/Great Smith Street junction – we appreciate the issue of the East-West Cycle SuperHighway nearby, but want to be clear that again, for a Quietway, more will need to be done to eliminate hook risks and calm motor vehicle traffic appropriately for cyclists to be able to move through this junction along the Quietway, without it acting as a barrier to cycling uptake.

Marsham Street junction – again, more work needs to be done to eliminate hook risks at the junctions with Great Peter Street and Horseferry Road particularly and to ensure cyclists turning are appropriately facilitated.

John Islip Street – despite this being a fairly low traffic volume street, we would prefer if pinch points and pedestrian refuges were removed (in favour of zebra crossings, for the latter), to minimise conflict and need to negotiate between cyclists and motor vehicle drivers. We also want to ensure cyclists entering and exiting John Islip Street from and to the Cycle SuperHighway are appropriately enabled to do so, no matter which direction they come from.

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.