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 Westminster Cycling Campaign, our local 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.

With this junction, we welcome the proposed segregated cycle lanes on Harewood Avenue, as well as making Harewood Avenue one-way which allows space for these lanes, as well as reducing hook risks for cyclists using the bus lane on Marylebone Road. We also welcome the contra-flow cycle lane on Enford Street.

That said, there are several serious issues – some of which likely count as "Critical Fails" in the new London Cycle Design Standards Cycling Level of Service (and its associated Junction Assessment Tool), that we wish to highlight:

- a) Cyclists should clearly be exempt from banned turns from Marylebone Road into Enford Street and Harewood Avenue. This should include safe methods for turning right "two-stage" with pockets and appropriate signals, for instance.
- b) We are very concerned about "hook" risks remaining for cyclists exiting Harewood Avenue and Enford Street with moving traffic. Particularly, there appears to be no protection for cyclists coming out of the cycle track on Harewood Avenue against left hooks from vehicles turning from Harewood Avenue into Marylebone Road (the same can be said for cyclists in the carriageway on Enford Street). Separate cycle signals and timings would remove this issue.
- c) We are also concerned about the apparent removal of the cycle track on the south side Marylebone Road between Harewood Avenue and Wyndham Street (TfL Consultations email response to a member of the Westminster Cycling Campaign, 18 January). As a general rule, unless there are compelling reasons to do so, new schemes should not reduce or remove options for cyclists – even if new facilities are likely to largely replace old for the majority of cyclists. For some cyclists, cycling with the flow of vehicle traffic on Wyndham Street will remain a more comfortable option than against the flow of vehicle traffic on Enford Street.

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 (current LCC policy sets out an expectation for new schemes to achieve a CLoS rating of 70 or above), and that eliminates all "critical fails" in any proposed design before being funded for construction, let alone public consultation. In the case of this scheme, that means ensuring all junctions have eliminated serious "hook" turning conflicts etc.