

TfL (in Westminster) Edgware Road

6 December 2018

<https://consultations.tfl.gov.uk/roads/edgware-road/>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

General comments on this scheme:

This scheme is opposed.

It is instructive that this major TfL scheme covering largely pedestrian improvements at five major junctions does not mention the term "Healthy Streets" once. This implies it does not come from the Healthy Streets portfolio at TfL. Every (major) scheme at TfL should use Healthy Streets methodology. This one cannot surely be said to do so.

While the pedestrian improvements are very welcome, this design would fail to achieve Vision Zero and likely several other Mayor's Transport Strategy targets, would reduce the possibility of providing for "strategic" cycling routes through this area and would continue to endanger those already cycling here and fail to tackle motor traffic dominance affecting pedestrians also.

It is likely this scheme includes numerous "critical issues" for cycling. Yet ostensibly nothing is proposed here to mitigate major safety risks to those cycling here. Schemes like this should no longer be funded by TfL anywhere, but particularly where they are likely to impact the strategic cycling network.

Specific points on this scheme:

- It is likely this scheme includes numerous "critical issues" under TfL's own Healthy Streets Check, including on volume of motor traffic when cycling is not separated. DfT traffic counts show circa 23,000 daily motor vehicle movements along Edgware Road here. And large vehicles also make up a significant (likely over 10%) proportion of those flows – a second "critical issue". Lane widths and turning movements also likely bring further "critical issues".
- All major schemes from TfL (and boroughs) should include a publicly-accessible Healthy Street Check, clearly highlighting any "critical issues". This scheme does not appear to include such information.

- This stretch of Edgware Road and the approaches to the junctions feature numerous collisions resulting in serious injuries to those cycling in the last five years. This proposal is unlikely to bring the junctions to “Vision Zero” standards. And there is nothing to indicate in this proposal these junctions will be revisited after this scheme, and therefore it is unlikely these junctions would be revisited again before 2041, except to fix failings in this scheme that are clear and predictable.
- Similarly there are many serious collisions with pedestrians around these junctions – and it is unlikely the measures proposed will reduce those to “Vision Zero” without further improvements.
- There are approximately 1,600 cycle journeys made along Edgware Road at the northern end of the scheme at least, according to DfT traffic counts. The Strategic Cycling Network crosses Edgware Road at both the Burwood Place/Harrowby Street and Kendal Street/George Street junction. Yet neither the junction designs in place thus far nor any proposed will adequately provide for the safety of those cycling across Edgware Road in this area. And the scheme fails utterly to enhance Edgware Road for cycling along it, despite the high numbers already cycling there. TfL’s Strategic Cycling Analysis also shows that the areas bounding the scheme are zones of “highest cycle demand” and “highest cycle demand and growth”. Given all of this, it is outrageous that this scheme clearly does not consider cycling in any manner seriously.
- Among local residents there is clear concern about the effect of displaced traffic from schemes such as this, and this has been used as a reason for inaction in the past by Westminster Council. TfL’s analysis also does show some displacement onto primarily residential streets bordering this scheme. The answer however to this issue is not to weaken safety improvements or avoid reducing the dominance of motor traffic, but to do more and better. Here, a more appropriate approach would be for Westminster Council to modally filter the areas bordering the scheme, turning them into “low traffic neighbourhoods”. This alone could dramatically improve the crossings of Edgware Road and help achieve the strategic cycling network, while also improving the lives of residents hugely.
- If the roads here are to be designated 20mph, then a combination of physical design measures (such as sinusoidal speed humps) and enforcement must be included. Current designs are unlikely on their own to achieve a consistent 20mph speed for motor vehicles.
- On the side streets here, there is a clear opportunity to use raised tables, even continuous footways on those with low traffic flows, to improve pedestrian priority and design in slower, calmer driving. That opportunity has been missed.
- The retention of central reservations on Edgware Road itself ensures that motor traffic speeds will remain higher, the road will be more of a barrier to those walking and the opportunity to create protected space for cycling will be missed. Edgware Road also features highly inconsistent lane widths and designs – with each direction

shifting from one to two to three lanes seemingly randomly.

- At Praed Street pedestrians must cross three lanes of one-way traffic, while cycling provision consists of only an advisory lane and an Advanced Stop Line (ASL). This is a deeply cycling-hostile junction design. ASLs do not confer any benefit to those cycling who arrive at a green light, nor do they enable a wider range of people or more people to cycle a route. Similarly, the ASLs and advisory lanes on Edgware Road are a mark of a total failure to consider cycling.
- The Sussex Gardens/Old Marylebone Road junction is even worse. It will still have two left-turn slip roads that require pedestrians to cross in two stages and require cyclists going straight ahead to move out of the nearside lane, bringing them into conflict with left-turning motor vehicles. Arguably these slip roads are the single worst element of this entire set of proposals. Additionally there are parking bays and opposing bus stops on Edgware Road to ride around, what appear to be very dangerous and inconsistent lane widths and essentially no cycling provision at all – despite the fact that there is a Quietway on Sussex Gardens that runs very close to this junction.
- The junction with Kendal Street/George Street is directly on TfL's Strategic Cycling Analysis as a key cycling route. The proposals here are deeply hostile to cycling – with loading bays located near to the junction, inconsistent lane widths and no protected space for cycling on Edgware Road and no appropriate designs for comfortable cycling on the side streets.
- The same issues also affect both the Upper Berkeley Street/Connaught Street junction and the Seymour Street junction.

General points about infrastructure schemes:

- LCC requires infrastructure schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which

promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.

- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.
- LCC wants, 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 issues" eliminated.