

## London Cycling Campaign

11 March 2016

[https://consultations.tfl.gov.uk/roads/a13-commercial-road/consult\\_view](https://consultations.tfl.gov.uk/roads/a13-commercial-road/consult_view)

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 Tower Hamlets Wheelers.

This scheme highlights that collisions with those cycling is a particular issue, yet then proceeds to offer nothing substantive to mitigate those concerns. Therefore we must reject this scheme. In particular we want to highlight the following issues:

1. The decision to retain the central reservation is clearly one that has not been made to benefit vulnerable road users, but to improve traffic flow by retaining right-turn pockets for motor vehicles. Instead, protected space for cycling (as well as bus lanes) could be gained by removing the width of this central reservation. And pedestrians would instead benefit from improved crossings.
2. Pedestrian crossings should be straight-across wherever possible – two-stage crossings encourage pedestrians to cross informally, which is far from ideal outside a school. The crossing at Philpott Street is particularly an issue – it should be straight across and moved nearer the school.
3. Junction design should enable people cycling to turn in comfort, convenience and safety in all directions. ASLs do not achieve this and should be replaced with better solutions.
4. The no entry to Turner Street is welcome, but it would be better to consider the area as a "cell" and ensure traffic does not just transfer to other nearby side streets. This would enable "Copenhagen" or "blended" crossings on the north side of Commercial Road also. (These crossings should only go in on very low traffic roads, and bollards, planters or other devices should be used to narrow the entry/exit point, ideally to one lane.)
5. The raised table/surfacing is too long, and is unlikely to control speed appropriately apart from at each end - although the crossings will help. It would be better to have raised tables at junctions and the crossings raised also, or apply a 20mph speed limit throughout the scheme and enforce with cameras.

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.