

## Cycle Superhighway CS9 – Kensington Olympia to Brentford

31 October 2017

<https://consultations.tfl.gov.uk/roads/cs9/>

This consultation response is on behalf of the London Cycling Campaign, the capital's leading cycling organisation with more than 12,000 members and 30,000 supporters. The LCC welcomes the opportunity to comment on proposals. The response is in support of responses from Hounslow Cycling Campaign and Hammersmith & Fulham Cyclists, London Cycling Campaign's local branches, and was developed with input from LCC's Infrastructure Advisory Panel.

Cycle Superhighway 9 is supported, with caveats. It represents a major improvement of cycling infrastructure in an underserved area, which will enable many more people to enjoy cycling in the area. That said, there are many elements of the scheme that raise concerns, both major and minor, as follows.

### General points about the scheme:

- The scheme does not go far enough in connecting to other existing and planned routes – at either end and throughout. Most urgent, the scheme must be successfully connected to the East-West Cycle Superhighway at the eastern end, routing it through the Royal Borough of Kensington & Chelsea. Current cycling provision in the borough is woeful and needs urgent and drastic improvement, including cycle tracks on main roads. The potential benefits of CS9 are dramatically curtailed by it stopping at Kensington High Street. On top of that, CS9 should also be extended as rapidly as possible to Hounslow town centre, and then on to Heathrow, continuing the same or better quality of provision. And links to other cycle routes intersecting the scheme should be given greater thought – with comfortable crossing points and connections throughout.
- Throughout the scheme, much more needs to be done to ensure cycle crossings of unsignalised side street junctions are done in safety and comfort. “Bidirectional” cycle tracks tend to suffer increased collision rates at unsignalised junctions. It is therefore imperative that any bidirectional cycle tracks pay particular attention to the design of side road crossings – as is highlighted in TfL's London Cycling Design Standards (LCDS). If “with flow” cycle tracks cannot be achieved on CS9 (and they should be considered further), then more work is needed on these junctions to ensure they are safe and comfortable for a wide range of people cycling to cross. Many of the junctions fail to deliver appropriate clarity and priority to those cycling (and walking). And where junctions feature high flows of turning motor vehicles and/or high speeds, these junctions should be considered holistically alongside other neighbouring junctions for an area-wide treatment to restrict or remove through motor traffic cutting between main roads and to filter or close some junction mouths completely.
- Often the scheme uses pavement space to create safe space for cycling, while retaining wider than necessary motor traffic lanes and/or turn lanes, central reservations and other such road features. Roadspace should be reduced wherever possible to ensure wide, comfortable cycle tracks and pavements.

- Junctions, including lights phasings, should be designed to ensure comfortable and convenient cycling movements to and from all directions in safety, and with priority. Those cycling and walking should not be delayed unduly to facilitate motor traffic flow.

#### **Specific points about Section A – Hammersmith Road:**

- Rowan Road and Luxembourg Gardens feature too much through motor traffic and should be filtered or treated as a pair.
- The crossing to/from Shortlands to CS9 should be further improved to ensure a clear crossing for cycling.
- The road is unnecessarily wide in several places in this section and that space could be used to deliver wider cycle track and/or pavements.
- Colet Gardens should be considered for further filtering to restrict through traffic to Shortlands, which features signals.
- The crossing of Blythe Road, given proximity to Olympia, needs further design work, including looking at the area and HGV routes, to ensure those cycling can pass Olympia in safety and comfort.
- It is unclear how those leaving CS9 should join traffic on North End Road.
- Once the scheme reaches the border of Kensington & Chelsea it reduces in quality dramatically and quickly. The scheme should urgently be extended, at the same quality as the provision in Hammersmith & Fulham and Hounslow, to reach the East-West Cycle Superhighway. Bus lanes are not appropriate cycling provision. And all of the side road and access junctions need further improvements to offer safe and comfortable cycling. The Holland Road junction could and should also be urgently reworked to improve cycling comfort and safety. Particularly as Holland Road and Warwick Road are highlighted on TfL's Strategic Cycling Analysis (SCA) as featuring a very high number of potential cycling journeys.

#### **Specific points about Section B – Hammersmith Road:**

- For Bute Road and Wolverton Gardens see above comments in Section A regarding Rowan Road.
- Speed humps on Cycle Superhighways can be useful to control cycle speeds in areas with high potential to also feature pedestrians (such as at "bus stop bypasses"). The hump between Shepherd's Bush Road and Bute Gardens seems superfluous – and therefore represents an unnecessary impediment to comfortable cycling, particularly for those cycling with mobility impairments and/or adapted cycles, trikes etc.
- Shepherd's Bush Road and Fulham Palace Road (outside the scheme boundaries) both fall on a corridor that is highlighted in the SCA as one of the top 25 highest potential cycling corridors in London (numbered 23). Therefore connectivity north-south here is of vital importance for cycling. The design of the link between Shepherd's Bush Road and CS9 is not of sufficient clarity or safety for cycling and must be further improved. (Links through the gyratory to/from Hammersmith Bridge are also highlighted as featuring high potential levels

of cycling journeys.)

- CS9 between Shepherd's Bush Road and King Street features several lights and crossings, including of a pedestrian crossing to/from the Broadway. Careful design is needed here to minimise pedestrian-cycle conflict and ensure both pedestrians and those cycling are not unduly delayed by lights phasing, and therefore more likely to cross against signals, as well as to provide enough waiting capacity given phasings for both pedestrians and those cycling, including potentially large growth in cycling flows.
- The Black's Road crossing needs further work to ensure cycling flows are given priority, and motor traffic turning movements are slow and calm.

#### **Specific points about Section C – Beadon Road:**

- On Beadon Road, a physically-protected cycle track could pass behind the current bus stop.
- Also, longer-term, a better solution for Beadon Road, most likely including cycle tracks, is required. This same solution should also consider through traffic in the wider area including Hammersmith Grove etc.

#### **Specific points about Section E – King Street West:**

- Cambridge Grove and Leamore Street feature too much through motor traffic and should be filtered or treated as a pair.
- Side road junctions here, including Holcombe Street, require further design work to ensure maximum priority, comfort and safety for cycling.
- It's unclear why the road space along King Street needs to flare and narrow repeatedly, despite mostly retaining a single lane. This space should instead be used to widen cycle track and pavements. Similarly, parking bays should be removed wherever possible and deliveries/servicing moved to side streets or rear access etc. to ensure again wider pavements – the vast majority of shoppers here are pedestrians.
- Given that Nigel Playfair Avenue is short and leads nowhere for motor vehicle traffic, it is surprising that its junction is so complex and clearly designed for high volumes of motor vehicle traffic. Hammersmith & Fulham Council should be progressively reducing the size of its car park opposite its offices, and working to reduce staff and visitors arriving by motor vehicle, as well as other associated motor vehicle movements onto the Avenue. And this junction should be further simplified to reinforce cycling priority. At the same times, the council have longer-term plans for this gyratory – and these should be considered in terms of the Studland Street junction.
- Rivercourt Road and Weltje Road are one-way through routes to/from the A4, feature too much through motor traffic and should be filtered or treated as a pair.
- Many of the side roads in this section form part of effective "modal filter cells". As such, junction design should reinforce pedestrian and cycling priority across the mouth with tight junction geometry and entry/exit width, "continuous footways" and raised cycle tracks.

- Trees in the middle of a cycle track risk issues with sightlines and roots and should generally be avoided.
- Given British Grove leads to what is effectively a “modal filter cell”, this junction could be simplified, with traffic either redistributed to other side streets in the cell, or traffic from other streets could be redistributed to here.

#### **Specific points about Section F – Chiswick High Road:**

- Prebend Gardens is already a well-used cycle route by those seeking to avoid Goldhawk Road and a better crossing to and from it for cycling should be designed in. Similarly the crossing from Annandale Road to/from Turnham Green Terrace is highlighted in the SCA as a link with high potential for cycling journeys to and from Turnham Green Station etc. Yet it is unclear how cycling movements across this junction will work, if at all.
- Given Netherarvon Road, Airedale Avenue and Homefield Road all form part of an effective “modal filter cell” turning volumes of traffic on these roads should be low and greater clarity and priority should be given to cycling and walking across junctions, with calm driver behaviour reinforced through design.
- If turning motor vehicle movements into Cranbrook Road are not very low, a modal filter should be considered on it.
- Brackley Road, Anandale Road, Devonshire Road, Duke Road and Dukes Avenue all feed a large area of residential streets and on to/from the A4. The junctions of all of these roads are not designed safely or comfortably for cycling flows and relatively high numbers of turning motor vehicles. The junctions should be redesigned and/or the roads beyond should be treated together to reduce through traffic. Duke’s Avenue particularly represents a major opportunity to improve the scheme – filtering it would remove through traffic from the A4, and allow for a far simpler road layout, without turning lanes – thus freeing up space for more pavement outside Our Lady of Grace & St Edward church. It is indicative, indeed, of the volume of motor traffic using the Avenue as a through route that both directions feature turn lanes into the street in the scheme. Instead other nearby routes to the A4, such as Chiswick Lane, should be used by motor traffic.
- The Heathfield Terrace junction features overly tight turns for cycling and poorly located taxi ranks that will heighten risk for those cycling towards the junction. The cycle track and pedestrian crossing on the northern side of the junction should also be redesigned to increase pavement space if at all possible. This could potentially be achieved by removing the pedestrian central island and hatching on the western side of the junction.

#### **Specific points about Section G – Wellesley Road, Heathfield Terrace:**

- Without further filtering or other treatment, it is very unlikely that the eastern end of this section, particularly Heathfield Terrace, will feature low enough traffic volumes to ensure a wide range of people feel comfortable and safe cycling here. It is likely that this end will feature stretches with over 2,000 PCUs of motor vehicle traffic daily – a threshold at which LCC demands either traffic reduction or physical separation. Sutton Court Road, Heathfield Gardens and Sutton Lane North are key links to and from the A4. It is a major failing of CS9 that these streets, along with other streets running between Chiswick High Road and the A4 do not appear to have been properly considered. Here, either further filters to remove all

through traffic, or physically protected space for cycling, or a rerouted alignment of CS9 to avoid this section, is likely required.

- Similarly, the roundabout at Walpole Gardens, Sutton Lane North, Wellesley Road and Heathfield Terrace will not be comfortable or safe for a wide range of people cycling to navigate – and represents a barrier to cycling. It is also a design that implies TfL and Hounslow borough assumes high volumes of motor traffic will remain here after the scheme is implemented. Traffic volumes and speeds must be reduced to well below 2,000 PCUs daily on all arms of this junction and/or the junction should be redesigned with the Wellesley Road / Heathfield Terrace routing of CS9 taking priority.
- As well as links to the A4, other potential motor vehicle through routes that avoid lights etc. remain, and remain a concern therefore. For example, Oxford Road North, north of Wellesley Road.
- Speeds above 20mph should also be physically designed out of this entire stretch.
- Entry treatments for all side streets should be consistent, and reinforce the priority of cycling flows and CS9, as well as encourage calm driving – with raised tables and tight entry/exit widths and turning radii.
- Pedestrian crossings should not feature “refuge” islands as those east of Harvard Road, Brooks Road and Heathfield Gardens do, as these introduce pinch points and increase conflict between those driving and cycling. They likely also mean a carriageway width change across the 3.2-4m range defined as a “critical issue” in LCDS.
- Either cycling to and from tracks alongside the A4 needs to be considered here, or access via Capital Interchange Way in both directions needs to be designed in.

#### **Specific points about Section H – Chiswick High Road (A205) (South Circular):**

- The link to and from Capital Interchange Way should be two-way for cycling.
- Stile Hall Gardens must be considered as part of the Wellesley Road “modal filter cell” and if necessary also filtered. This would then also allow the junction design to change to improve priority, comfort and convenience for those cycling and walking.
- Lionel Road South is considered so dangerous, some local schoolchildren are forbidden from crossing it. It must be improved in this scheme, and should be filtered to remove through traffic from using it.
- The bus stop on the north side of the road, outside Kew Bridge station, represents a point where safe cycling infrastructure disappears completely – meaning this section will not be suitable for a wide range of people to cycle. It is a major failure in the scheme as planned, yet there are many likely solutions to the issue. One obvious one would be to cantilever off the existing bridge to widen it and add pavement or cycle track over the rail line – this approach has been repeatedly used elsewhere.
- High numbers of people already cycle across Kew Bridge and this alignment is highlighted in the SCA as having a high potential for more cycling. Yet facilities are very poor – and the scheme does nothing to improve matters. Safe cycling movements onto and off the bridge

should be designed into CS9 – with cycling movements onto and off the shared space on the bridge separated from turning movements.

- Strand-On-The-Green represents a major “hook” risk from turning motor vehicles and should be filtered or otherwise treated to remove this issue.

#### **Specific points about Section I – Brentford High Street (East), Waterman’s Park, Kew Bridge Road:**

- Green Dragon Lane is an existing desire line used by those cycling to and from Ealing and access to and from CS9 to the Lane by cycle should be improved.
- Bus lanes are not appropriate cycling provision to enable a wide range of people to cycle. The wide bus lane should be split into a (semi-segregated, potentially) cycle track and a bus lane.
- Again, all side street and access junction treatments should be designed throughout to reinforce calm driving behaviour and enable safe, comfortable cycling and walking. Several side streets here require far better designs to avoid fast, sweeping motor vehicle turns etc.
- The use of Waterman’s Park raises several issues – the gradient of track and use by trikes, adapted cycles etc.; and issues of overlooking and perceived safety after dark. It is very important to enable as wide a range of people to cycle along all sections of the route and so alternatives to routing through the park should be considered carefully.

#### **Specific points about Section J – Brentford High Street (West):**

- Again, side road and access treatments need improvement. And further consideration on an area-wide basis to remove through traffic, for instance at Wilkes Road.
- Ealing Road should be considered for cycle tracks. And the scheme, either way, should further improve this junction by better protecting those cycling out of Ealing Road, turning in either direction, as well as removing “shared space” in favour of physically separate and protected space for those walking and cycling. Also, those cycling west past the junction should be physically protected.
- The SCA highlights Boston Manor Road as a route with high potential for cycling. The scheme should be extended to Half Acre as a minimum to link with the scheme being developed there. (Or, if the scheme cannot be extended immediately, Alexandra Road needs improvement, as does the link to and from it.)

#### **General points about cycling schemes:**

- LCC requires 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 mode 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.
- 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 Fails" eliminated.