Policy Guidance for IRG and CCC:

West End Project

Mustafa Arif, Rachel Aldred. 26 June 2014

# Aim

This short note seeks to interpret the West End Project in relation to LCC Policy. It does not seek to set the response to the Project but rather to establish the extent to which the Project complies with our headline policy position in terms of cycling infrastructure/environments as voted on at the 2013 AGM. It also suggests what might be acceptable compromises in terms of our policy position.

# Background

Camden Council have launched their [West End Project consultation](http://www.wearecamden.org/westendproject/) which requires a response by 18 July 2014. The £26mn scheme proposes the transformation of Tottenham Court Road, Gower Street and nearby streets by 2018, to include removal of (most of) the existing one-way system, bus priority on Tottenham Court Road and semi-segregated cycle lanes in Gower Street. The project will be extremely high profile given its location in Central London and proximity to Cross Rail.

The project is controversial in terms of its provision for cycling with various strongly held positions being advocated by cycling campaigners. A number of alternative options for cycling provision were considered by Camden and rejected. It is understood that the Mayor’s Office privately do not support the plans, which they consider to have insufficient provision for walking and cycling.

Camden Cycling Campaign (CCC) have been consulted for several years and are reluctantly supportive of the scheme on the basis that there are no viable, better alternatives, and having been convinced that their own preferred scenario (separated cycle tracks on Tottenham Court Road) “cannot work in the presence of so many bus services and passenger movements at the stops”. However new information is still being made available and CCC will meet on 30 June to finalise their position.

### Responsibilities for formulating the LCC response

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| Group | Responsibility |
| Camden Cycling Campaign | Consulting with members, assessing options and formulating response |
| Infrastructure Review Group | Reviewing CCC’s proposals and finalising a recommendation |
| Office staff | Writing the response |
| Campaigns & Active Membership Committee | Accountable to the Board for the response. |
| Trustees | Arbitration in case of dispute (primarily the lead Trustees for Policy and Campaigns). |

CCC, IRG chairs and the office staff have requested clarification of how LCC policies (especially those passed at the 2013 AGM should be interpreted in the context of the West End Project.

# Policy Basis

The 2013 AGM passed two relevant motions about cycling environment quality. These refer to

(a) speed and volume thresholds for provision of high quality protected space and

(b) the need for routes to be suitable for all ability cycling.

These policies were adopted following the Love London, Go Dutch campaign and the Mayor’s commitment to meet LCC’s key tests and subsequent ‘Vision for Cycling’. They represent a declaration that the LCC is committed to increasing the modal share of cycling, not simply enhancing conditions for those who already cycle.

When conducting more detailed assessments LCC may refer to other standards such as LCC’s Go Dutch Matrix and Quality Criteria, and the new LCDS Level of Service Assessment, in establishing the quality of cycling environment being provided. While we acknowledge that compromises will usually need to be made our 2013 motions provide a starting point for a high level assessment of any scheme.

# Camden West End Scheme

The West End scheme is complex and includes a number of different roads. As well as Gower Street and Tottenham Court Road (one of which will be included on the Central London Cycle Grid), there is Gordon Street (currently a recommended quiet N-S route and potentially affected by motor traffic diversion away from Tottenham Court Road), a number of minor East-West streets, New Oxford Street, and the upper end of Shaftesbury Road. Of key interest in relation to policy will be scrutinizing changes to important cycling alignments to ask: does this mean that they will now pass the LCC motion criteria of speed, volume, and inclusivity?

## Tottenham Court Road / Gower Street

We focus on these two roads which have become the main area of contention, for several reasons (direct, N-S routes, presence of key trip attractors, being named on the Central London Cycle Grid).

It is clear that the proposals here by Camden do not meet the quality criteria laid out by LCC policy:

* Traffic volumes on Tottenham Court Road will be significantly higher than 2000 PCUs/day. Therefore LCC policy requires either further traffic reduction or segregation.
* Even with the CCC’s suggested ‘red lines’ of making Tottenham Court Road genuinely bus only (i.e. filtering out east-west through motor traffic) traffic volumes are still expected to be higher than 2000 PCUs/day.
* Looking to the spirit of the protected space policy cycling in a busy bus corridor with no protected space is clearly not “as safe and inviting as the Netherlands”.
* Providing inadequate segregated facilities on Gower Street and letting confident cyclists cycle in motor traffic is in violation of LCC’s policy on universal provision.
* As expressed in CCC’s summary position (April 2013) the scheme will “not do much to encourage new people to cycle”.

## Compromise schemes and the LCC policy criteria

Ideally we would like LCC policy to be met on both TCR and Gower Street (as well as all other streets within the area). This would ensure inclusive cycling throughout the area and in policy terms is the ideal high level solution. However, given the needs of other road users we acknowledge that compromises will need to be made. As TCR and Gower Street are very close, parallel roads, we consider that if either TCR or Gower Street were to be made compliant with LCC policy this could represent an acceptable compromise in policy terms. This might be through:

* Creating high quality segregated cycle facilities (because motor traffic will remain too heavy for our policy criteria to be met) on TCR or on TCR and Gower Street.
* Filtering Gower Street to all through motor traffic (because there is insufficient room for segregation and two lanes of motor traffic).

In policy terms we do not have a preference for specific solutions but note that regardless of specifics, compromises that meet LCC Policy thresholds can contribute to our long terms aims through creating inclusive cycling environments that create qualitative and quantitative transformation in cycling.

Campaigners are currently deciding the nature of the response to the scheme. However, in terms of LCC Policy, we note that the proposed scheme fails our criteria on both main North-South routes within the scheme area (we have similar concerns related to other alignments, but have decided here to focus on TCR and Gower for reasons stated above). We consider the two broad suggestions above to be compromises that would meet LCC Policy Criteria on at least one of these alignments.

If a scheme that is not compliant with LCC Policy criteria is to be considered a “stepping stone” to a better scheme then a strong case must be made for that. In particular:

1. It should be shown that there is a good and valid explanation why a better scheme is not achievable today. This should be balanced against the potential opportunity cost of being able to achieve better cycling conditions today through a different scheme.
2. The ‘stepping stone’ scheme helps achieve the case for the better scheme (for example, by increasing cycling numbers so that it becomes politically possible to reallocate road space).

We note that the proposed filtering of Tavistock Place has only become politically possible after the increase in cycling along LCN 0 / Seven Stations Link which is, at least in part, due to the existence of the segregated tracks.

### Key Questions

The LCC Campaigns and Active Membership Committee has identified five key questions to help campaigners decide upon their response to the scheme:

1. Do Camden Council agree that our suggested compromise options would substantially enhance cycling conditions in this area? If we are not to achieve these by 2018, is there a timescale in place so we can decide whether the wait is acceptable?
2. Pedestrian amenity. We would like more information on how our suggested better compromises above would affect pedestrian comfort, compared to the currently preferred option. In particular we believe pedestrian comfort would be the same or better, providing additional arguments for more cycle-friendly schemes.
3. Buses. Segregation on TCR could go alongside maintaining bus priority for most of the road’s length, which would reduce the modelled delays that assume no bus priority. We believe that there are reasonable grounds for doubt that the modelled delays are accurate and would ask why schemes with partial bus priority (which could meet our Policy Criteria while having a more positive impact on buses than modelled alternatives) do not appear to have been modelled.
4. Have Camden Council considered implementing a more radical alternative (either involving additional filtering, or acceptable quality segregation) as a trial, as part of the scheme?
5. Will the scheme grow cycling in the area such that more radical options become politically possible in the future?

## Other Policy Considerations

**Buses** - LCC policy on contention between cycling and buses is still being deliberated by the Policy Forum. Our draft policy expresses scepticism for modelling results that show negative impacts on bus journey times through implementing cycling schemes. We also note that the proposed scheme is attempting to *improve* bus priority, and that alternative options for cycle segregation do not take away any existing bus priority measures.

**One-way systems/gyratories:** A segregated scheme that is compliant with LCC policy may only be possible by retaining a one-way system. This does not cause a policy conflict as we do not currently have formal policy on one-way systems.