The Camden (Torrington Place to Tavistock Square) (Prescribed Routes, Waiting and Loading Restrictions and Loading Places) Traffic Order [2017]
PLANNING INSPECTORATE REFERENCE: DPI/X5210/17/8

Closing Submission - Camden Cycling Campaign

A. Introduction

1. Thank you for the opportunity to present this closing submission on behalf of Camden Cycling Campaign. We represent the interests of cyclists living, working and travelling through Camden. We are the local branch of London Cycling Campaign and our response is fully supported by them. It is also fully supported by London Living Streets, representing the interests of pedestrians. Due to diary clashes, their representative is unable to be at the Inquiry to make his own closing submission.

2. We support and are guided by the Mayor's Draft Transport Strategy[1], which has as its first theme "Healthy Streets and Healthy People". This says: "Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates".

3. To achieve the cycling part of this Strategy, a strategic network of safe, direct and attractive cycle routes has to be created and the Tavistock–Torrington corridor forms a key part of this. Indeed, in the evidence submitted by Dr. Will Norman, the Mayor's Cycling and Walking Commissioner, we heard that the Tavistock–Torrington corridor 'represents an exemplar approach to redesigning our streets to enable more people to walk and cycle. It is an exemplar of the Healthy Streets Approach that underpins the Mayor's Draft Transport Strategy'.

4. To achieve such a network, road space needs to be reallocated to cycles. That can be done:

    - either by taking out a lane of motor traffic as Camden has done on Royal College Street and on the Tavistock–Torrington corridor, and as TfL are doing with the cycle superhighways, such as those along the Embankment, over Blackfriars Bridge and elsewhere;

    - or by reducing the amount of motor traffic in a road so that the space can be safely shared between motor vehicles and cycles e.g. on the route through Somers Town or on Lamb's Conduit Street.

5. Camden has adopted and implemented this strategy through a range of measures such as:
    - Minor interventions to improve cycle permeability.
    - Point closures ('modal filters') to prevent through motor traffic in local roads.
    - Major schemes, like this one and the segregated cycle tracks on Royal College Street, which is a key North-South route between Kentish Town and Bloomsbury, linking to this route.

    Camden are using an area-based approach, moving through traffic out to main roads, and so creating low traffic neighbourhoods. We encourage this approach.

[1] GLA June 2017: Mayor's Transport Strategy - Draft for Public Consultation (CD 2/1)

6. Some journeys by motor vehicle may take longer and some traffic may displace to other streets, but any consequent pollution or other adverse environmental effects will be compensated as more people take up walking and cycling.

7. This corridor has been a major desire line for cycling ever since the original two-way track was completed in 2005. It was carrying 900 cyclists per hour in peak hours before the trial. If the scheme reverts to its pre-trial status, large numbers of cyclists will continue to use the route and others will be obliged to divert to unsuitable routes such as the Euston Road, with negative consequences for the safety of cyclists in both cases.

8. Statistics collected during the trial scheme show[2]:
    - Very large numbers of cyclists using the corridor – over 1,000 per hour at peak times on Tavistock Place. This is far more than the number of motor vehicles before the trial (maximum of 400/hour). It is only exceeded on a few cycle routes in London, such as the Embankment and Blackfriars Bridge which are on the cycle superhighways.
    - A significant decrease in the number of motor vehicles on the corridor leading to a much quieter street, a safer and more pleasant environment for walking and cycling, and lower noise levels for pedestrians and people in adjacent buildings.
    - Improvements in air quality (reduction of NO2) on Tavistock / Torrington Place and nearby.

9. We accept that the data provided by Camden could have been more resilient. Notwithstanding this point, it is clear (by observation and common sense) that the trial scheme has shown that the route has an essential role in achieving a modal shift to cycling through Camden:
    - There has clearly been a significant increase in the number of cyclists using the trial scheme and on the routes that access it[2].
    - Some of the additional people cycling have decided to use their bikes because of the increased safety that the new scheme brings.
    - We have noticed a significant increase in the numbers of parents with young children, people with mobility impairments and cargo delivery bikes using the trial scheme.

10. Camden's consultation results[2] show support for the scheme amongst all groups except taxi drivers, with particularly positive comments from pedestrians, cyclists, students and staff at local institutions.

11. An important issue arising from the trial is that some traffic has been displaced onto other streets in Bloomsbury. We sympathise with those suffering additional traffic and the consequent pollution. This needs to be solved, but **not by removing the cycle tracks which have been a great success**.

12. Measures to mitigate any displacement of motor traffic are welcome. In particular, we support Camden Council's desire to implement the Brunswick Square scheme referred to in their SoC (paragraph 2.6) and also the Midland Road scheme (referred to in ID4 3/2/1 Dollimore PoE) to reduce the motor vehicle numbers in Judd Street.

[2] Consultation detailed information (attachment to consultation document) (CD 6/9)

B. Our Evidence

In our proofs of evidence we demonstrated the following:

1. The strategic importance of the route, as demonstrated by Jean Dollimore (ID4 3/2/1) and Simon Munk (ID4 3/2/2).
2. The inadequacy of the previous road layout including, in particular, the cycle track widths, configuration (cyclists approaching each other, very close and head-on) and position on the carriageway which caused dangerous confusion at junctions (Munk, Walford). This was well illustrated in the video shown by Richenda Walford (ID4 3/2/4 Walford) and in the collision statistics, particularly those involving pedestrians and right-turning vehicles.
3. The necessity for wide cycle lanes was demonstrated during Simon Munk's cross examination. Busy, single-file tracks discourage exactly the type of people that we need to encourage onto bikes. Those on wide or slow bikes don't want to block the route for everyone else and those low in confidence are frightened by the proximity and risk of collision. On a busy track, to achieve the desired diverse profile of people on bikes, the track has to be wide.
4. The huge health benefits for individuals of regular walking and cycling. (ID4 3/2/3 Aldred).
5. We are aware of claims of a significant increase in journey times for motor vehicles travelling from the Hunter Street area to UCLH and from Queens' Square to UCLH. George Coulouris' evidence (ID4 3/2/6) shows that motor vehicle journey times on these routes are generally not unreasonable.
6. We are also aware of claims of large and frequent tail-backs on some roads including Judd and Hunter Streets. We (ID4 3/2/5) (and Camden, during cross-examination) presented evidence to show that queuing is sporadic and due to the management of the traffic lights at Euston Road.
7. We presented evidence of significant support from local businesses (ID4 3/2/7) and overwhelming support from many local institutions of national standing including UCL (ID4 21/2), SOAS (ID4 3/2/7), and the London School of Hygiene and Tropical Medicine (ID4 3/2/7). Jeremy Till, Head of Central St Martin's, gave a moving plea for safer cycle routes; two students from his institution have been killed, while riding bicycles, in recent years and he stated (quoting from his Proof of Evidence ID4 3/2/8):

   > "It would be a really retrograde step to revert to a dangerous and inadequate system. I would be failing my duty of care to my students and colleagues not to state this in the strongest possible terms".

8. Isabelle Clement (ID4 3/2/9) and Helena Azzam (ID4 3/2/10) presented evidence on the importance of well-designed wide, segregated cycle tracks for people with mobility impairments. These two witnesses represent members of a protected group that, as well as being provided with an adequate cab service, must also be allowed access to adequate active travel options. During cross-examination, Ms Clement pointed out that wheelchair users like herself were 'sitting comfortably' and did not need to be set down directly outside the front door of their destination.
9. Evidence was presented by Matthew Chico (ID4 3/2/11) about the huge benefits of the scheme for people cycling with children and those using child-transporter and 'cargo' bikes. This is critical to get children using active transport modes in these days of rapidly increasing child obesity. It is also a key way of encouraging independence.
10. Finally, we heard from an Islington resident, Tabitha Tanqueray (ID4 3/2/12), of the importance of the route to very many cyclists travelling into Camden from neighbouring boroughs, whether to get to work, to get to university or other classes, to visit shops, or for social reasons.

C. Objectors' Evidence

Reading the objectors' Proofs of Evidence we were struck by how often evidence was presented that was unfounded, and/or selective, and/or so extreme as to be highly questionable; particularly in the fields of congestion, pollution and journey times. Jointly these exaggerations tend to undermine the objectors' case. There were so many instances of overstatement that we could not possibly challenge each one. In our cross examinations we challenged a few as examples of the problem.

1. We challenged the evidence on journey times quoted for inter-hospital journeys, inviting comparison with analyses of journey times obtained using a tool based on Google Maps (ID4 3/2/6). It was established that the times quoted by UCLH may include components other than pure time on the road.
   Giving evidence for BRAG (ID4 18/2/8) 'Journeys to Hospitals' Ms Scarrott informed us that she had carried out a limited test in actual taxis. This showed that, some of the times for the same journey had reduced from 20 minutes to 10 or 13 minutes. This brought the evidence into the realms of reason, and some common ground was reached, namely: that some journeys are more complex, that journey times are variable, that the trial may have increased them a bit but that generally they are not unreasonable.

2. In response to the selective videos and photographs of congestion in Judd Street, Ms Walford referenced our evidence that, in a limited survey, the congestion was shown to be rare. (ID4 3/2/5). During BRAG's free format summation of their evidence, Ms Coates stated, unprompted, that traffic queuing in Judd Street is sporadic.

3. BRAG (Scarrott ID4 18/2/9) claimed that picking up and dropping off is "impossible" on the south side of Tavistock Place. When questioned the witness agreed that it is perfectly legal to drop off on the south side.The witness also claimed that dropping off on the north side was "worse" (than the impossibility on the south) due to the physical barrier there. But when questioned the witness agreed that she understood that barrier would be removed were the trial to be made permanent. But any such problems currently being experienced are not relevant to the Public Inquiry.

4. LTDA claimed (ID4 14/2, responding to cross examination) that it was unacceptable for even one mobility-impaired taxi passenger to have to move 50 metres on the footway. But in his primary evidence he suggested that the gain to the health and convenience of the mobility-impaired cyclists using the track is not significant. This is not a consistent view.

5. Richard Massett, representing the LTDA, agreed (ID4 14/2) that he represents only black cab drivers; and that they comprise less than 10% of total PHV and taxi drivers. We noted that no PHV operators (not even Uber or Addison Lee) have opposed the scheme, even though they use the same road network as black cabs.

D. Our Position on the Alternative Proposals

Objector groups have proposed modifications to the scheme. These include reversing the direction of motor traffic or allowing two-way motor traffic in parts or all of the corridor. All suggested alternatives are only made possible, by reducing the space allocated to cyclists and pedestrians. We believe that none of these are workable alternatives and that all of them have serious disbenefits for vulnerable road users. In particular we feel that a return to the pre-trial layout would be a massively retrograde step. It is not supported by any of the major objectors at the Inquiry, and certainly not by us. The benefits of the two wide, separate cycle tracks are widely recognised as being too important to discard.

John Russell (witness for ILHL) in cross-examination reaffirmed his written evidence that there were benefits to cyclists from the proposed scheme (improved version of current layout). He confirmed that to deliver them there must be two segregated cycle tracks of appropriate width according to LCDS guidelines.

Here below, we give our preliminary views on the principal alternative proposals. Any decision to adopt one of these could only be taken in the light of a much more detailed design and evaluation, including modelling and safety analysis:

1. The scheme promoted by BRAG, that is to say: 2-way motor traffic with narrow non-segregated cycle lanes demarcated by white lines, would have the following disadvantages:

    a. It would throw away the benefits achieved so far in terms of a more equitable distribution of road space; improvements to the streetscape for pedestrians and cyclists and a safer road layout.

    b. It would put more motor traffic back onto the corridor and thus generate more pollution and risk of collision, and not encourage active travel.

    c. It would use substandard, dangerous cycle lanes with no protection for cyclists and inadequate width for passing slower cyclists or for unconventional cycles including cargo bikes and bikes designed for people with mobility impairments.

    d. It would be impossible to engineer in a way that cyclists would feel safe. Many less confident cyclists would avoid it.

    e. It would not mitigate the effects of the West End Project.

    It should also be noted that the BRAG witnesses who supported this scheme all admitted to being very experienced cyclists who were content to mingle with motor traffic. This type of cyclist is already cycling in London. This scheme would do little, if anything, to promote cycling across a wider demographic.

2. The scheme suggested by the Imperial London Hotels Limited, supported by The Bedford Estates, of a single westbound motor lane, while retaining some of the benefits of the trial scheme in terms of cycle track and footway widths, also has many disadvantages:

    a. It would increase motor traffic volumes on the extension to the east along Tavistock Place, Regent Square and Sidmouth Street, which is part of the CS6 extension and in which cycles will share the road with motor vehicles.

    b. It would put more motor traffic back onto the corridor and thus generate more pollution and risk of collision.

    c. Designing safe junctions would be difficult.

    d. It would not mitigate the effects of the West End Project.

    e. Unknown, unintended consequences would only be knowable with extensive research or another trial.

    However, we would prefer a westbound scheme to the pre-trial layout.

3. The scheme suggested by LTDA to facilitate taxi access to Euston Station. This keeps the current eastbound motors but with a middle section of 2-way motors between Gordon Square West and Woburn Place (or Bedford Way). This also has disadvantages :

    a. The middle section would become a busy and polluted, taxi-dominated, motor road.

    b. For two or three blocks the cycle tracks and the pavements would be at a substandard width. To be attractive and safe, infrastructure must be consistent and continuous.

    Finally, any significant redesign of the route would again delay the implementation of a permanent scheme; would add significant cost to what has already been an unexpectedly costly exercise; and would extend the pain and division that this dispute has created in the local community.

E. Conclusion

1. Camden Cycling Campaign fully supports Camden Council's proposal to make the scheme permanent, with all the improvements in the consultation plans[3], including the increased and improved space for pedestrians. This will continue to encourage people, of current and future generations, to choose active and sustainable modes of travel, whether walking or cycling. It will be a significant demonstration of the Council's order of road user priorities to encourage healthy and sustainable travel, as referred to in their Statement of Case (section 5):
    1. Pedestrians
    2. Cyclists
    3. Public transport
    4. Private motors

2. Reverting to the previous layout would, due to the increased number of cyclists, return vulnerable road users to an even more hostile environment than it was in November 2015. This is especially the case in view of the upcoming changes due to the West-End Project.

3. Reverting to the previous layout would also have negative implications for cycling and pedestrian schemes in Camden and across London, for many years to come. It would also be contrary to local, London-wide and national policy. Any issues such as traffic displacement believed to be caused by the scheme should be dealt with through Camden's planned mitigation measures rather than by removing this scheme.

4. We urge the Inspector to recommend that the current layout, with planned improvements, be made permanent.

Camden Cycling Campaign

1st November 2017

[3] Consultation Leaflet 2016 (Camden Council) (CD 6/9)