

TfL consultations

4 November 2014

Dear Sirs

London TravelWatch's response to TfL's superhighway proposals, East to West, North to South and Aldgate to Bow Roundabout.

London TravelWatch is the statutory watchdog representing all the users of London's transport system including cyclists, pedestrians and bus passengers. We are grateful for being consulted. We would like to thank the many TfL officers and the Cycling Commissioner for assisting us in understanding the proposals.

London TravelWatch strongly endorses the transport, health and wider societal benefits that are to be had from increasing the levels of cycling. London TravelWatch supports the Mayor's Transport Strategy target that cycling should have a modal share of 5% by 2020. To this end, it is clearly important that cycling should be as safe as it can be made, and that the public should feel confident about taking to their bikes.

The cycle superhighway proposals put forward, which will result in three lengthy separated cycle tracks, are innovative, exciting and potentially far reaching. The scale of what is proposed and the novelty of some of the interventions will have a profound impact on a wide range of transport modes across a wide area of London. Our general support for the Mayor's cycling target is based on two key considerations – the health and social benefits of cycling, and the importance of cycling as a contributor to the efficient use of scarce road capacity. But, in this latter respect, cycling is not unique. Buses also allow for a very economic use of road space, and there are of course many bus users for whom cycling will not be an option. In our view it is essential that a careful balance is struck between the interests of cyclists on the one hand and bus passengers and pedestrians on the other.

In this context, the far reaching and 'big bang' approach currently proposed for cycle superhighways gives us some grounds for concern. There will be significant impacts on London's bus services and their passengers – bus journeys will be slower and maybe less reliable over a wider area than just the superhighway routes. There may well be additional costs to the bus budget. It is therefore imperative that the bus priority schemes that TfL are proposing in order to mitigate the impacts (which we welcome) are understood by everyone and are delivered as soon as possible, preferably in the same time frame as the superhighway proposals.

The bus passenger waiting environment (the bus stop) will change significantly for passengers along these routes, particularly along the route between Bow and

Aldgate, perhaps to such a degree that some visually impaired passengers cannot continue to use bus services. We know that those representing the visually impaired share our concerns. Significant pavement space is being removed along sections of the Bow to Aldgate superhighway which will be detrimental to the pedestrian environment along these streets. Additional pedestrian crossings will be welcomed, but additional waiting times for pedestrians won't be.

There are substantial changes to the traffic management of London's strategic road network planned, particularly east of Tower Hill. There will be road safety benefits at some locations for some modes. But there may also be increased risk for some at other locations.

The scale of the schemes proposed will lead to much disruption of travel for many people in London over an extended construction period.

We would therefore propose that consideration be given to a staged approach to the implementation of the three schemes.

Staging of these proposals would mean that the traffic management technique (gating) could be trialled for a period prior to the beginning of construction. This would allow the forecast delays to general traffic and bus services to be verified prior to the loss of traffic capacity in the central area. The proposed bus priority schemes could also be installed at the same time or ahead of the superhighway schemes. The least impactful scheme, which we believe to be the north to south one, could be built first which would allow more trialling and learning to be applied to further schemes.

The staging of the schemes would mean also less disruption from construction works.

If staging is not possible, then we would urge that implementation be carried out in a way that allows as much learning as possible to be built in to the process – both about the effect on cycling and about the impact on other road users. In particular there is scope for much more detailed consideration of bus stop bypasses in a busy street environment.

We would not wish the concerns raised in this response to be seen as diminishing our general support for cycling and for the safety of cyclists. It is possible that the superhighway proposals will lead to a 'step change' in attitudes to, and enthusiasm for, cycling amongst the general public. If so this is a development we would greatly welcome. But behaviour changes of this kind are difficult to forecast; meanwhile the potential disbenefits to other road users are tangible and very clear. The best way to strike a fair balance is to proceed with implementation of the superhighways proposal in a way that allows the best possible learning from the early phases of the project, so that lessons can then be applied later on.

Please find attached some further comments from London TravelWatch on more detailed aspects of the proposals.

Yours sincerely

Stephen Locke

Stephen Locke

Chair, London TravelWatch

Additional comments as part of London TravelWatch's response to TfL's superhighway proposals, East to West, North to South and Aldgate to Bow Roundabout.

The impacts on bus service performance.

There will be an impact on several bus services journey times due to the loss of bus priority (for example on the approach to Parliament Square from Westminster Bridge and the approach to Blackfriars Bridge from the south). There will also be an impact on bus journey times because of the loss of general traffic capacity at various locations along the routes (for example Parliament Street).

There will be an additional indirect impact on bus service journey times beyond the route itself, because of the displacement of general traffic due to the reduction in capacity along the routes and the 'gating' of traffic to the east and south east of Tower Hill.

Some of these delays were detailed in the consultation documentation, but many were not. For example detailed modelling results for bus route 453 at Parliament Square are published, but modelling for the other routes that use Parliament Square 3, 11, 12, 24, 53, 87, 88, 148, 159 and 211 has not been published. No information on the journey time delays for bus services beyond the superhighway routes has been published.

The impact of these proposals on route 453 illustrates our concern. What is presently an 8.24 minute am peak, south bound bus journey between Trafalgar Sq and Westminster Bridge will become a journey of 15.24 minutes – 18.24 minutes according to TfL published modelling. There are three additional routes that do exactly this segment of road and one presumes may be affected to the same degree. A near doubling of the transit time will clearly make this section of route very unappealing to passengers. Whilst it is not in the busiest direction it will mean additional cost to the bus budget. As a rule of thumb we understand from the industry that an additional bus is required for every 2 minutes extra journey time. This implies the 453 and at least three other routes would each need 4 extra buses. The operating cost of an extra bus is of the order of £200,000pa. TfL suggest they can install bus priority elsewhere to mitigate these delays, but its not credible that all can be clawed back and if they do so elsewhere its not helpful to passengers sitting on a bus in Whitehall.

London TravelWatch has seen TfL's modelling of the impacts on all bus services as a result of all the major central London 2016 schemes (not just the superhighways). Whilst we recognise additional bus priority measures may well be put in place to reduce delays, these are so far unknown. We do not think it is credible that future bus priority interventions alone will make up for all of the extended journey times. These negative impacts will be over and above those that will arise from the growth

in London's population and economy. Therefore many bus services (more than suggested during consultation) will be slower and less reliable. There will be additional costs to the bus budget. These impacts should be assessed and the results published. These impacts should be monitored over time as learning for the future.

Bus stop bypasses

The use of bus stop bypasses seems integral to the plans for segregated cycle lanes. Their introduction on to streets such as Whitechapel Road which are very busy is novel. They raise four concerns:

- i) How will the safety of pedestrians and passengers be assured when they are boarding and alighting buses in a very busy pedestrian area? Particular issues will apply to visually impaired passengers and pedestrians. It is unclear how visually impaired passengers will manage.
- ii) For many years London TravelWatch has campaigned for better walking conditions on London's streets. The introduction of a cycle track around the back of bus stops will mean a less pleasant walking environment. Pedestrians and bus passengers will have to put up with a less comfortable environment and avoid cyclists which they would otherwise not have to do. Particular problems can be expected where there is
- iii) narrowing of pavements to accommodate bus stop bypasses and cycle lanes . This may lead pedestrians to spill into the cycle lane at some locations. Pedestrians will find themselves crossing multiple kerbs - a significant obstacle for wheelchair and buggy users
- iv) Crossing the bi-directional tracks passing between bus stops and pavement will be a further complication and risk for pedestrians and passengers.

We have seen the research so far undertaken by TfL into bus stop bypasses, however this is limited to the less well used stops on Stratford High Street which is a very different environment from the Whitechapel Road. London TravelWatch believes that more detailed evidence of the impact of bus stop bypasses in a busy street environment such as Whitechapel Road is needed. We request more trials and proper research be undertaken to look at the wider needs of all users of London's streets and whether or not bus stop bypasses meet all these needs.

Pedestrian amenity

The introduction of multiple kerbs into the street will not be welcomed by pedestrians and those with buggies, in wheelchairs or otherwise encumbered. They will find them a real obstacle to crossing the street. Some will not be able to cross the road because of the additional kerbs. We note the very limited TRL off-street trials commissioned by TfL support this view. The narrowing of stretches of the pavement between Aldgate and Bow Roundabout to 2.5m may mean pedestrians spilling into

the cycle lane. A minimum pavement width of 4 metres should be maintained on these busy pavements.

Scale of works to be undertaken in just over a year.

Central London will see an enormous amount of work on London's roads being undertaken at the same time. The City of London's present works at Aldgate, East to West, North to South and the superhighway between Aldgate and Bow will effectively be all built at the same time. This will be an unacceptable level of disruption for passengers and others. London TravelWatch believes the construction timetable should be reconsidered in order to minimise disruption to road users.

TfL's traffic management known as 'gating'

It is our understanding that TfL intend to use its traffic light signals to slow westbound traffic entering central London. This technique is described as 'gating' and was trialled during the Olympic Games. We understand the 'gating' technique is reasonably well understood, however it has not been applied over an extended period, nor on the scale proposed. Gating will not be as effective in the pm peak as the am peak. Gating must operate successfully to ensure traffic can flow freely in the central area. TfL should consider implementing the gating they propose, prior to construction, for a good period. The success or otherwise of gating should be subject to scrutiny before the implementation of these major schemes that depend on it working as expected.

Road safety

There are a number of potential road safety issues that TfL should consider. We have discussed these with TfL and look forward to discussing these further as their analysis of them progresses.