

BLOOMSBURY RESIDENTS' ACTION GROUP

PROOF OF EVIDENCE 12

Commentary of the Council critique of BRAG proposal

SUMMARY

NICKY COATES

1. Council criticisms of BRAG's proposed modifications to the trial should be seen in the context of the trial not meeting the Council's own objectives.

- a) In addressing Camden Council's criticisms of BRAG's proposal it should first be noted that ***the Council's own aims for its scheme have not been met. This being the case it seems sensible to look for alternative solutions.***

2. Reviewing the Council's points of criticism

- a) The Council's criticism of BRAG's scheme is encapsulated in Appendix D of the Statement of Case as follows:

2.1.3 The BRAG proposal, while reintroducing two-way working for motor traffic, requires a reduction in width of footways, cycle lanes and the carriageway lanes from what has been in place as part of the Trial. It also requires footway and carriageway widths that are narrower than were in place prior to the Trial.

- b) Whilst BRAG's proposal met all national standards, the Council has said it is judging it against the London Cycling Design Standards (LCDS).
- c) In applying these standards, which carry no legal obligation (LCDS 1.1.3), it should be noted that the Torrington Place/Tavistock Place corridor is a designated Quietway, not a Superhighway.
- d) This being the case it seems that the Council's move to widen the cycle lanes and thereby encourage high speed cycling (now recognised by the Council as a problem it has caused) and facilitate overtaking on Tavistock Place was not only potentially dangerous but also in conflict with the TfL designation of this route as a Quietway. The Council appears to be set on transforming the corridor into a de facto Superhighway, which is in conflict with its own and TfL policies.
- e) It should also be recognised that the corridor is a pre-existing historic London street. The Council is not building a new road in an open space, where widths can meet any aspirational standards; it is adapting a confined space, historically populated by local and passing pedestrians, cyclists and vehicles. It is at the heart of a residential community, with mixed residential needs. Therefore, desired widths and changes have to be applied with common sense and a sense of proportionality and an awareness that all sections of the community should have a fair share of the space, and that the quality of life and health of the local population needs to be considered.
- f) Taking the criticisms set out in 2(a) above in turn:

g)

- i) Currently, and before the trial, the narrowest part of the footway is 1.32m. The narrowest section of pavement under BRAG's plan would be 1.5m, and so would be an improvement on the current minimum width. For part of the route the footway would be slightly reduced. However, the Council cannot reasonably rule out a plan just on the basis of a footway narrowing, as its own plan for the West End Project would result in the narrowing of footways on Gower Street.
- ii) ***It is clearly therefore Council policy and practice to narrow footways when it wants to accommodate other priorities, and so dismissing the BRAG plan on these grounds would be inconsistent with its own practice.***
- iii) It should be added that the Tavistock Place pavements between Judd Street and Woburn Place have not been observed by local people as ever being at all crowded; there are times of the days when there are virtually no pedestrians.
- iv) Reduction in cycle lanes. Would cycle lanes in the BRAG plan be narrower than those in the trial? Again, because the lanes vary in width considerably the answer is not straightforward. What is absolutely clear is that the BRAG cycle lanes are, contrary to the Council statement, in part wider than the trial cycle lanes. ***The current cycle lanes, which have been hailed as such a success by the Council, are in part only 1.5m wide whereas the minimum width in the BRAG plan would be 1.7m.***
- v) The trial cycle lanes are less than 2m in three sections of the corridor: (all on the north side) Judd Street to Marchmont Street, Marchmont Street to Woburn Place and outside Waterstones amounting to approximately 27% of the cycle lanes on that route. BRAG's plan is an improvement on this, since in its plan, cycle lanes would be less than 2m on only 20%-24% of the route (Marchmont Street to Woburn Place, both sides). It should be stressed that BRAG has no professional facilities or funding for consultants to undertake measurements, and also that the road width varies considerably; therefore these measurements are necessarily approximate. However, even with some margin for error, ***it can be seen that the blanket statement that 'a reduction in width of...cycle lanes... from what has been in place as part of the Trial' is inaccurate and misleading.***
- vi) Reduction in carriageway lanes. Carriageways under the BRAG plan are clearly narrower than the trial carriageways, since there would be two lanes rather than one. BRAG cannot comment on whether they are narrower than before the trial since the Council ensured that there was no warning of the trial and so no chance to take measurements.
- vii) It is recognised that the carriageways would not meet LCDS ideal widths, but BRAG maintains they would be adequate since they meet other national standards.

3. Comment on other Council points in Appendix D

- a) The Council states that BRAG scheme would '*preclude further improvement by widening footways*'. This is patently nonsense. Over the last 14 years 3 different strategies have been in place on Tavistock and Torrington.
- b) In 3.1.2 the Council makes the remarkable statement: '*It is difficult in most cases (apart from the obvious where the westbound route is removed as part of the trial) to attribute the change in volume solely to the trial.*' This is a puzzling comment because, firstly, the essence of the trial is the removal of the west-bound route. But secondly, the volume of traffic can absolutely be attributed to the trial. The Council's own assessment is that 350 west-bound vehicles per hour have been displaced from Tavistock Place on to surrounding streets. This has been witnessed and reported by local residents since the day the trial started.
- c) ***The Council's determined dismissal of residents' views and its frequent refusals to believe, or take account of their testimony, or even to reply to their concerns, has been the hallmark of this trial.***

4. Conclusion

- a) Before 2005, the two-carriageway/two cycle lanes solution worked well. It is recognised that there are more cyclists now, but the BRAG plan allows for 2.2m cycle lanes for 60% of the route.
- b) Out of rush hour there are frequently no cyclists at all to be seen on the corridor. This massive disruption and detriment to quality of life is to accommodate two-three hours faster cycling for passing commuters, for five days a week. There are 168 hours in the week, when residents live here and have to put up with the adverse effects of the trial. The cycle lanes are busy for perhaps 10-15 hours a week; and at other times mostly empty. For the passing commuters the trial facilitates slightly faster (***although, note, not safer***) cycling for perhaps 15 minutes per day. BRAG does not think this is worth the widespread detrimental impact on the health and quality of life of local people.
- c) Recognising that the vehicle lanes would be narrower than ideal, BRAG has suggested banning HGVs at rush hour, to give added protection to cyclists, but this idea – which is understood to work well elsewhere, was dismissed by Council officers.
- d) The ideal widths for lanes and footways as set out in Appendix D are recognised by BRAG as desirable. However, in an existing historic city street, ideals for all widths cannot be achieved; ***there has to be some compromise. The Council's chosen compromise is to compromise on the health and quality of life of local people;*** their compromise is to aim for very wide pavements and cycle lanes and to remove one lane of traffic, with consequential displaced vehicles increasing congestion and pollution in residential streets; this is all at the expense of the health and quality of life of the thousands of people living in these surrounding streets.
- e) BRAG's view is that the pavement widths, cycle lane and carriageway widths proposed would be adequate, meeting national standards, and that BRAG's plan would achieve a workable space for all without the adverse effects. The BRAG plan would not have the extreme and widespread detrimental impact of the Council's single-minded aim for Superhighway-

style high-speed cycle lanes which are unnecessary and out of line with Quiet lane policy.

- f) The pre-2005 layout, which would be a reversal of the trial, with modification, is tried and tested. It is a solution which would accommodate all road users and avoid the widespread adverse impact of the one-way trial. The trial has not met its objectives and has had multiple adverse effects. The BRAG plan is a reasonable and workable solution.***