



Response to Fleet St CRISP

City Cyclists is unhappy with the draft CRISP and notes that many other LCC local groups have had similar views with the CRISPS in their areas. In this case, most of the important suggestions by cycling groups have been rejected based on confused and ill-thought out reasoning.

We believe the problems start from the strategic objectives in 1.3 which have still not been amended despite our concerns at the pre-CRIM. As a result of these being vague and undefined the whole of the report suffers and offers at best proposals of extremely limited benefit. What is an “upgrade” or “high quality” for cycling as the consultants do not seem to know? The LCN+ proposes to make routes safe, fast and convenient. The CRISP simply fails to consider the second two and makes many proposals which would actually make the route *less* safe.

The “possible constraints on maintaining a safe and complete route for users” shows the consultants trying to hide their lack of understanding of what they should be doing by using bureaucratic language. The fact that the congestion and high volume of motor traffic does not figure on this list shows how failing to set out objectives properly can lead to the most obvious being missed.

This translates into the failure in the existing conditions for cyclists section in part 2 to consider the actual conditions for cycling rather than the lines that are painted on the road. At the CRIM we pointed out frequent instances of the cycle lanes being blocked or useless, being too short for the motor vehicle queue length etc yet this does not feature at all. There's still nothing on enforcement in para 2.14.

The proposals suggest removing bus lanes and pavement space (by St Pauls) to (re)introduce cycle lanes as opposed doing anything to reduce the large volume of unnecessary motor traffic, in particular empty taxis.

This is despite the fact that the City of London Police, a number of Corporation Members and user groups raised serious concerns that cycle lanes on roads such as these did not aid safety but were rather a hazard in themselves. Further that on the CRIM, City Cyclists pointed out how cycle lanes did not assist cyclists but positively hindered them due to large amount of kerbside activity.

There is also the fact that the London Cycling Design Standards state that road space reallocation such as bus lanes are a better solution than cycle lanes and tracks which come last on the list. The absence of any consideration of the LCDS standards in the CRISP is striking even more so as we raised it at the pre-CRIM. In short we feel it better that the CRISP was substantially re-written rather than trying to go ahead with the stage 3 meeting. We note that the LCN+ team overruled our view at the pre-CRIM meeting that the CRIM should not go ahead before the report was in order and that our fears appear to have come true with the state of the draft CRISP.

Data sheets

1A

Problems & barriers for cyclists:

“No cycle specific facilities”: this really shows up the problems with the consultants' lack of knowledge and understanding. The problems here for cyclists are the high motor vehicle flows and the kerbside obstructions, cycle specific facilities are the last option to be considered (see LCDS, CFI or City Cycling Plan) in dealing with this. Also that the existing ASL feeder lane is too short.

Constraints

add need for taxis to set down/pick up.

Options

- 1) Cycle lanes (why 1.5m, could be wider)
- 2) Loading bays set into the kerb as part of a wider street scene improvement

NB these could go together

1B

Problems

No dropped kerbs, unclear whether cycling is legal or not across pedestrianised section.

Options

Create track or shared used section (as at other similar points such as on High Holborn)

Recommendation

Remove “if sufficient sightlines can be obtained”. This used to be open to all motor traffic, it can easily and safely be legally reopened for cyclists indeed many already use it.

1C

Problems

Both ASLs have insufficient feeder lanes making it impossible for cyclists to bypass congestion. No space to introduce westbound feeder without removing one of the westbound queues which would be difficult due to heavy right turns.

Opportunities

Chancery Lane improvements (there is a new community association wanting to do something)

Less traffic turning into lane following experimental right turn up Fetter Lane.

Safety/pedestrian scheme at junction (should not be in strategy options)

Strategy Options

Remove 1 as it is not an option. Option 4 is quite possible if a gradual ramp, as for example on Bishopsgate which is also a major bus route. Option 5 should not be dismissed: seems consultants did not understand why it was suggested. This was to reduce stopping chance for cyclists and the ASL problems, make all traffic flow smoother/traffic calming.

1D

Nothing considered for this section of Fleet St westbound: why?

Also nothing on Fetter Lane junction despite this being a collision hotspot.

Opportunities

Rebuilding of chicane to make less intrusive on street scene and interfere less with Lord Mayor's Parade. Funding possibly from Corporation.

Strategy options

Option 1 would increase already significant risk of cyclists being left-hooked at Fetter Lane

junction: physical separation would let drivers 'forget' about cyclists. Very dangerous suggestion. New option of inverting chicane so that build out starts at Chancery Lane junction then chicane bends in so that cyclists not pinched but can take the lane (as explained on CRIM).

1E

Existing Characteristics

These need to mention the kerbside activity, including taxis which are not affected by the loading restrictions.

Problems

Bus lanes obstructed by kerbside activity, congestion, pedestrians stepping into carriageway, westbound chicane. High speeds of motor traffic when carriageway clear.

[Cycle parking is a problem along the whole route so shouldn't feature here but elsewhere in the report. Funding for this comes from the Corporation's own budget not the LCN+ budget.]

Options

These options are confused and mixed up. Option 1 should be the 20mph zone (needs traffic calming measures), option 2 the traffic calming measures, option 3 the point no entry and the prohibition on all except buses and access, option 4 the removal of bus lanes and replacement with cycle lanes plus widened footways plus bays as part of street scene scheme, option 5 removal of bus lanes as part of street scene scheme and no cycle lanes (requires option 3) as no need due to low flows. No need for the "pedestrian zone" section and also remove the cycle parking as that should come from Corp's own budget.

The prohibition on motor traffic scheme must be considered as part of feasibility studies since without this the proposals are unlikely to make much difference to cyclists' speed, convenience or safety. Also it is most unlikely that the bus lane removal will be allowed since Fleet St is congested and has many bus routes. It is not right for consultants to be able to kill this off at this early stage by simply stating they in their view are "unlikely to be acceptable".

2A

Again lack of cycle parking is not appropriate for the data sheets, in any event many cyclists use the railings to park.

Again stating "Lack of cycle facilities" as problem when it is only one of the potential solutions shows serious misunderstanding.

Options

Change option 3 to redesigning road layout to reduce speeds, i.e. removing pig-pen crossings, make one level (the middle of the road is already raised) etc. similar to Bishopsgate/Liverpool St junction.

3A

Existing Characteristics

Add high kerbside activity.

Problems

Add Congestion

Options

Separate 20mph proposal from traffic calming to make two separate options. Add 20mph option or at least mention it in following data sheets. The rejection of the option based on the alleged "steep incline" is silly. There is no incline at the Old Bailey junction indeed this option is supported in the next data sheet, there was never a suggestion made of a raised table at Limeburner Lane and in any event the ramp gradients can be made gentle.

Need to include option 1 of 4B of motor traffic restraint and tie this into recommendations.

3B

As the photo shows this is not on an incline let alone a steep one so the rejection of option 1 is wrong. In any event road humps are not being proposed but a raised junction which has difference gradients and characteristics.

4A

Problems & Barriers

At risk of stating the obvious, the major barrier to cycling here is that it seems it is prohibited at present.

4B

Again we completely reject the way option 1 has been discarded in this manner. None of the other options will comply with LCDS for this section. Options add after option 1, street scene scheme to make reduce dominance of traffic, similar to that outside Parliament.

4C

As above. Also we reject the proposal to widen approach by reducing the pavement width as the pavement is likely to see heavier use once Carter Lane is closed a few metres down.

Data

Rather than saying “there is a high accident [sic] rate” it would be better to consider the road danger: how high is the Killed or Seriously Injured rate for cyclists compared to cycle flows, i.e. are more cyclists killed or seriously injured than would be expected on a London wide average based on existing cycle flow levels.

Maps

Between pages 4 and 5: the key is wrong. “Existing LCN+ route” should be changed to “Proposed CN+ alignment” and “Existing LCN route” needs to be split between “Existing LCN route” (for High Holborn – Bank though of course many of the proposed LCN+ alignments mirror existing LCN routes) and “Advisory cycle routes” (the yellow on the London Cycling Guides): see existing situation larger map.

The existing situation drawing includes some bizarre data from the LCGs: short sections of “completed cycle routes” on the A201 either side of Ludgate Circus, West Poultry Avenue and part of Gresham St. It also shows Little Britain and other sections in green as if they are “through park or besides canal”. Change “Accident analysis key” to collision, and “Vehicle” to “Other vehicle” or “Other Road User” since it could be a pedestrian.

Record of CRIM

No date recorded (or maybe the sheet with this has found its way into Appendix C).