

# Torrington Place / Tavistock Place - Consultation Report

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## 1 Consultation Document

### 1.1 Policy Objectives & Critique

The Consultation Document, as a minimum, needs to demonstrate progress towards meeting the declared objectives of the cycle scheme:

- To improve safety for
  - Cyclists
  - Pedestrians
- To remove overcrowding on the single cycle track
- More pavement space for pedestrians
- To reduce through traffic in Torrington Place between Gower Street and Tottenham Court Road

Before considering the evidence collected from traffic counts, the objectives themselves require comment.

There appears to be an invalid presumption that cyclists should not face congestion when all other road users, private and public, do. Buses are required to queue in traffic so why not cyclists? Indeed any law abiding cyclist must necessarily queue in the vast majority of traffic lanes that do not have cycle tracks, when the traffic pauses.

In three years Camden report that there were 57 reported collisions in this section of road. They do not examine how this compares with similar stretches of road without lanes. Is the cause of accidents the result of corralling cyclists into a concrete channel so that cyclists cannot evade unexpected manoeuvres in front of them? The casualty rate could be due as much to the design of the track as its flow rate. The studs might provide a safer barrier, which by integrating them more in the traffic obliges drivers to keep them in their minds throughout Torrington/Tavistock and not just at junctions. Studs also allow better off-peak road sharing (see below).

The only space where pedestrians are inconvenienced in this section of road is the stretch opposite the Tavistock Hotel. This was not changed for the trial but is proposed for the next phase. This is a very short section of street where the biggest problem is the roots of trees roughing up the paved area and the old railing stones which are no longer used and could be removed to provide a meaningful increase in pavement width. A cure to this problem might be all that is needed. As a resident of Tavistock Place who walks that section of road quite frequently I consider that there are far higher social goals that could be met than widening the pavement in this area.

Whether the traffic flow at top end of Torrington Place was excessive or not and whether residents were pressing for this remains unclear to me. What it prevents is traffic turning off Tottenham Court Road to avoid the westward congested Euston Road.

### 1.2 Adequacy of Evidence for Consultation

There have been three statistical exercises, two traffic counts and one pedestrian count. Two relate to cyclist and pedestrian flows along Tavistock / Torrington, while the other is a full traffic count for a much wider area.

No information is available on who conducted the count - were they independent? - nor precisely how they conducted the count?

The cycle counts are only for peak AM and PM hours. They are also for one day under the single lane (24/03/15) and one day with two lanes (12/05/16). There are two failings to note here:

- No measurements are taken in off-peak periods, which would reveal virtually no cycle traffic. It is common in transport studies to concentrate on peak flows because planners are largely preoccupied with capacity and solving a purely transport concern. However, this scheme is not only about transport but community - those who live in the area rather than the transients who pass through. By failing to collect this data they mask the opportunity for more sophisticated road sharing arrangements, particularly those that would allow off-peak loading and unloading.
- Traffic flows not only have diurnal patterns, but also weekly and monthly ones too. In addition to what statisticians call seasonality in data there is an irregular component and an overall trend. By selecting only two different days 14 months apart, there is a danger of the measured differences between these two days being heavily influenced in descending order by: irregular shifts, weekly differences, seasonal variation and continuation of trend. Thus the data generated by Camden's Transport Department is poor. Whether this was to save money or to create window dressing for a decision that had already been made prior to the trial is difficult to say. Both are possible, though it should be remembered that Camden Officials had inserted into a Section 106 granting planning permission for the redevelopment of The London Hospital for Tropical Disease and Medicine, a requirement for the centre to pick up the costs of the post trial cycle track. This was sought while the trial was in progress - strongly suggesting a decision to proceed with the twin cycle lanes whatever the results of the trial or the outcome of the consultation.

The area traffic count is also only a two day comparison (12/05/15 and 17/05/16). In this case both are Tuesdays and include lunchtime as well as AM and PM peaks.

The pedestrian count is also a two day comparison (24/03/15 and 11/05/16) - Tuesday and Wednesday respectively.

Time has not permitted a check on whether these days were affected by special events such as transport strikes, local conferences, university exams, rain (relevant to cycling), etc that might distort the data further. A methodological report should have checked this and recorded such distortions. In any event the criticism of the survey weaknesses cited above stand for all three counts.

On methodological grounds Camden council tax payers should be able to expect a higher professionalism than revealed in the Consultation Document.

## 1.3 Trial Results and Objectives

### 1.3.1 Cycling

#### *Safety*

In relation to the safety objective the trial can produce no evidence either way. So we do not know if this objective has been met at all or in what degree. We are told that collision data is not yet available for a sufficient length of time to measure the effect. Put another way, the underlying incidence is so low that not enough observations can be amassed in the 14 month trial period.

Given that safety was a primary objective warranting a large expenditure of money to conduct a trial, Camden ought to wait until it does have data. In addition it should conduct tests to determine whether the incidences of accidents in the lane with a step and the other with studs are significantly different at the 95% confidence level. This would address the issue of whether the raised step, by hemming in cyclists and preventing evasive action contribute to the accident rate. In addition no statistical difference between the modes of separation would allow studs to be used, absent safety considerations, and so facilitate road sharing for loading and unloading.

Pressing for Consultation prior to collecting data to validate a key objective underpinning the scheme, adds grist to the mill that Camden Transport Department have already made their decision and it remains a case of pulling the wool over the eyes of Councillors and voters.

### ***Removing Over Crowding***

The second objective of removing overcrowding on the pre- trial single lane by providing two lanes has almost certainly been achieved. However, as mentioned earlier, this begs the question whether cyclists should be privileged, over other traffic including buses? What years of transport planning suggest is that adding capacity increases usage because of the associated reduction in travel times – an experience which directly leads to the congestion charge. The improvement has been achieved by halving the road capacity of other vehicles and preventing, or raising the cost of, essential service vehicles delivering to residents' homes (see below for more on this topic). The scheme has also diverted traffic on to bus routes, in all probability increasing their travel times and discouraging bus use at peak times (see below for more on this). Thought should be given to smart alternative cycling options that do not meet exclusively the needs of transients at the expense of residents (see below).

### ***More Cycling?***

Combining the cycle count figures for the AM peaks and also the two measuring points it is possible to assess the change in Eastbound and Westbound cycle traffic. The combined AM peak saw a significant eastbound increase of 30%, while the westbound increased by only 7%. The PM peak both east and westbound showed increase of around 15%.

Since it was not the aim to increase cycling along this route, the data is irrelevant to declared objectives.

The data cannot support the view that there are now more cyclists as a result of the scheme, since we have no measurements of trip diversions. The extra road capacity devoted to cycling may well have attracted cyclists from previous routes, equally the greater congestion at junctions caused by diverted Westbound vehicles may have persuaded cyclists to abandon their preferred routes in favour of the two lane system. Quite why the AM peak changes east and westbound vary so much might be revealing for policy formulation but remain at present open to speculation.

### **1.3.2 Pedestrians**

The Pedestrian counts show a mixed picture and the Consultation Document only speculates on the reasons. Camden acknowledges that there might have simply been fewer people on the survey days (a danger of single day surveys for policy formulation). Given the number of hotels in the area, and that March tends to be a weaker tourist month than May one might expect greater numbers in the periods when two cycle tracks were operating.

Overall it seems that pedestrians have not benefited from the change.

### **1.3.3 Traffic**

The Traffic Count over a much wider area than Torrington/Tavistock shows largely the effect of diversion caused by the introduction of a second cycle lane and one-way road traffic east along this section of road. Clearly westward traffic had to find new routes.

Focusing on the areas who have had an 80% increase in traffic or more (highest 400%), a clear pattern emerges, though there are isolated hotspots (e.g. Wakefield Road). In the rectangle of streets bordered by Gower Place/Endsleigh Gardens to the North, Tavistock/Torrington to the South, West of Woburn Place and East of Gower Street there is a very large increase in traffic. A rather similar pattern occurs in the PM peak.

One of the objectives of the scheme was to relieve traffic congestion for the residents of the 100 yards of Torrington Place between Gower Street and Tottenham Court Road. While this must have been achieved it is

a pyrrhic gain. A far larger area of residences has been adversely affected with traffic increases ranging from 80% to over 400%.

Finally, if one focuses on the principal bus routes in the area (Southampton Row/Woburn Place, New Oxford Street, Gower Street) there are increases in these already busy streets in the AM peak of between 20% and 100%. One has to ask whether to ease congestion on a cycle route for 2 hours, merits impeding the flow of countless buses. One London double decker accommodates roughly 80 people - fractionally less than the increase in usage on these cycle routes going each way. The number of bus passengers forced to suffer longer travels times due to greater congestion must outweigh the number of cyclists enjoying less congestion.

## 1.4 The Forgotten Groups

The focus of the Consultation Document on the trial pays scant attention to issues outside its objectives, some of which are of concern to others.

### 1.4.1 Vehicle Users

The analysis presented in the Consultation Report does not take account of the costs of increased travel times. It is unlikely that there has been a net reduction but then there is no evidence either way. This information is basic to any transport analysis and should be available and presented to inform the consultation. If there are increased net costs, these must count against the overall cost-benefit of the change in cycling arrangements in the area.

### 1.4.2 Residents

#### *Air Quality*

While the consultation report shows improved air quality measurements between pre-trial and trial periods, rightly avoiding single day measures, Camden have chosen to take different periods for the purpose of comparison. These figures show a drop in Nox emissions (presumably in micrograms per cubic metre) at Gordon Square, Russell Square and Tavistock Place. This data raises more questions than it answers. It purports to demonstrate in the context of the document that air quality has improved as a result of the trial. This is not a safe interpretation. What is the comparison over periods for the same time of the year? If this cannot be answered, it suggests the scheme needs to be run for a longer period to have seasonal comparability - a similar point has been made relating to accident data. What was happening across London at the same time these measurements were taken? Was there a London wide fall in Nox in the trial period too? What is the trend in Nox in the area? Is it coming down anyway due to more hybrid vehicles etc? So did the scheme increase or arrest the decline? Camden has not provided an answer to this question so they cannot claim an improvement due to the scheme.

Camden reports complaints about increased congestion in local streets, which would suggest higher emissions, especially since the average traffic movements have remained much the same pre and post the cycle changes.

#### *Residential Access*

Residents require access to certain vehicle deliveries.

- Delivery vehicles (internet orders, shop deliveries, meals on wheels for elderly, etc)
- Repair and maintenance vehicles (repair to fitted household goods, servicing of equipment, building/decorating works, aerials/router fixes, window cleaning etc)
- Removal vans (house and flat moving)
- Major External Works (scaffolding, cherry-pickers)
- Dropping off / picking up people in wheelchairs or zimmer frames.

The consultation Document makes no attempt to identify whether the loading and unloading arrangements are adequate. This is a major failing. Prior to the trial, I had emailed the transport department asking how they proposed to answer this question. Though they did not answer me, the clear answer delivered by the Consultation Report is “ignore it”.

An assessment is essential and should make provision for growing demand. Deliveries are not only likely to grow as a part of internet ordering, but also due to an aging population less able to engage in DIY and more likely to need repair and maintenance services. So what is adequate now will not be adequate in a few years. Measuring hours when the bays are empty is useful information, but the analysis needs to capture the situation where a delivery vehicle passes by full bays and has to circle around the one way systems in an attempt to find a suitable space. Some vehicles have simply parked on the pavement to make a delivery in Tavistock Place.

Local plans also need to take account of the safety of individuals carrying loads across two cycle lanes and one traffic lane. For example the cycle scheme should not go ahead without a zebra crossing between the unloading bays in Herbrand Street and the Northern side of Tavistock Place. Soon our property will require scaffolding for redecoration under the buildings leases - this, if arrangements stay as they are, will involve men carrying a 100 scaffolding poles across the three lanes of Tavistock Place.

Camden have failed to make public the provision for major events such as house moving and scaffolding. When I spoke to Camden’s project manager, who had courteously visited to apologise for the failure of residents in Tavistock Place receiving advanced notification of the trial, she remarked that she had no idea how these major loading and unloading problems could be resolved. The absence of guidance in the Consultation Report suggests the answer is “ignore it”. One building, during the trial, seems to have been given permission to block the northern cycle lane in Tavistock Place. Is this policy? This required cyclists to pass into the street in one of the gaps in the concrete lane separator – a manoeuvre much more easily performed with stud separators. Apparently permission was given ad-hoc, but it should be at zero cost and the policy made clear to local residents. Why should residents bear the extracost of solving the transport problems of transients? Of course, had the scaffolder been working on the south- side of the Road cyclists would have had to divert against the Eastward flow of vehicles.

Residents in Central London largely forego owning a vehicle because of its impracticality and cost. This means there are a number of shopping/delivery needs that cannot be met by the non-car household without recourse to a delivery van or lorry. Traffic restrictions - parking costs and the congestion charge - largely to deter commuters from entering a major employment zone - already impose restrictions on residents in that zone. Transport planning departments of central London councils seem more concerned to manage traffic flows for travellers than the impact on residents through which their schemes pass.

Policy should take on board the interests of residents rather than just those of transients.

Vehicles need a place to park, so many of the households in Tavistock and Torrington that previously were permitted loading and unloading are now denied it or unfairly pay a higher cost for it. This, therefore, adds to the restrictions in the centre in an incremental fashion that knows no limit. Camden Councillors, particularly in the area of this scheme, need to think twice before either supporting it or keeping their heads down.

## **2 The Binary Choice and Unconsidered Options**

The Consultation is inviting a choice between the two cycle lanes, configured in their present direction or a reversion to the old configuration.

If this is the binary choice on offer then the:

- failure to present key data touching on objectives
  - Accidents

- Evidence of relationship between single lane accidents and congestion rather than the design of the cycle lane
- Comparable air quality outcomes
- Traffic counts on only a single day pre and post change that is unreliable for policy formulation
- creation of new problems that seem to outweigh the benefits of the revised cycle scheme
  - Greater congestion over a wider residential area than the congestion it was designed to avoid
  - Congestion on bus routes due to vehicle diversions
  - Apparently longer travel times for vehicles
  - Inadequate policy on loading and unloading

suggests one should sensibly vote against the proposed scheme.

However, there are other options that could be considered and studied:

- Have East and Westward cycle routes on separate roads. Since it is primarily the safety objective that needs to be met, then even if this option results in a longer cycling distance this should not be an issue.
- Road sharing between cyclists and road users in off- peak periods; making safer provision for pedestrians carrying loads from unloading bays to points of delivery; no charges for periodic cycle lane suspensions when major works deliveries and house moving is involved.

It is difficult to escape the conclusion that Camden's officers have decided they want the new configuration no matter what is said by the voters in this ward and can get it pass unquestioning councillors. The London Cycling Campaign will doubtless marshal, through its leafleting of cyclists at traffic lights en route, a great number of pro votes on the Camden website. However, this exercise raises important political issues for Camden Councillors and our MP. We expect them to represent our concerns. We also expect policy to be properly informed by evidence that has been impartially and scrupulously gathered. Policy objectives should not be the only issues for public debate but the policy instruments intended to secure those objectives. I believe the above shows that evidence has been poorly gathered and evaluated, debatable policy objectives have not been supported by what has been gathered, and totally inadequate thought has been given to options that might accommodate both commuter and resident interests. Instead Camden has organised a shouting match between lobbies, with no desire to engage in any other issue but winning their preconceived views. At a time when disillusionment with politics is to the fore, political figures in Camden might reflect whether this sort of policy management is not its very source.

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