



Formal response from Bloomsbury Residents' Action Group to Camden Council about the Tavistock-Torrington trial

STATUS OF THIS PAPER

This full response underpins the summary response which is being submitted to Camden Council.

At a BRAG meeting held on 4th October, following discussion about the Tavistock trial, and the presentation of BRAG's alternative plan, there was overwhelming support for the motion calling for the Council to consider BRAG's alternative plan, with two-way traffic and two cycle lanes, as an alternative scheme for the Tavistock/Torrington corridor. The vote was: 41 for the motion; 3 against.

To date, 928 people have signed the petition which declared:

The Tavistock-Torrington Trial, London WC1, (Experimental Traffic Order, commencing November 2015) has:

- ***Created additional traffic congestion and pollution***
- ***Made surrounding streets more dangerous for cyclists and pedestrians***
- ***Severely restricted access for emergency vehicles, in this area of high terrorist risk***

The Tavistock-Torrington trial (Experimental Traffic Order) is a failure and I call for this Trial now to be abandoned.

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1. SUMMARY

1.1 Bloomsbury Residents' Action Group (BRAG) was established to give a voice to local residents, whose views, health, wellbeing and quality of life have been taken little or no account of in the planning and assessment of the Tavistock trial.

1.2 Since its inaugural meeting on 26th May, BRAG has gathered hundreds of like-minded supporters:

- 928 have people signed the petition to date
- 116 people have either commented on the website's 'Have your say' section or joined as subscribers
- 75 people attended BRAG's public meeting on 4th October
- 70 people participated in BRAG's Community Planning Day on 8th September

1.3 The impact of the trial has been to:

- Increase congestion and pollution
- Make mobility more difficult and more expensive for frail, older and disabled people
- Impede emergency vehicles
- Undermine the sustainability of the community by making the practicalities of daily life for residents more difficult and stressful
- Damage local business.

1.4 BRAG has identified an alternative 'compromise' plan, which accommodates both the two new single-direction cycle lanes and also two-way motor traffic. This plan conforms to, and in parts exceeds, national standards. For 20% of the route, the minimum width requirements for pavements, cycle lanes and traffic lanes set out in national standards are met or slightly exceeded; for 20% of the route, minimum standards for pavements and traffic lanes are met, and the ideal width for cycle lanes set out in national standards is met. For 60% of the route, ideal widths for pavements and cycle lanes are met and in parts exceeded. It will also be seen, from the consultation with cyclists referred to, that this plan not only meets and largely exceeds national cycle lane standards but also, for 60% of the route, meets Camden Cyclists' additional preferred width for unidirectional cycling lanes of 2.2m.

1.6 Camden Council's consultation process is fundamentally flawed; a review of the process demonstrates six key points at which the process has been conducted incorrectly, or in a manner which appears to deliberately exclude and ignore residents. The Council is prioritising the interests of transient commuter traffic over the wishes, interests, health and wellbeing of residents.

1.7 The Council has no evidence at all that one of its key aims - safer cycling - has been achieved, and its evidence of improved air quality is misleading, as the Council refused to measure air quality in streets where the trial has caused congestion and much increased pollution.

1.8 BRAG therefore calls on the Council to abandon the Tavistock-Torrington trial and to change to road layout to accommodate two cycle lanes and two lanes of traffic as suggested in the BRAG plan. This would meet the aims of the trial in providing wider and safer cycle lanes and making roads easier to cross, without causing any of the attendant problems of diverting traffic on to unsuitable and inappropriate local streets, increasing and extending congestion and air and noise pollution, blocking emergency routes and worsening access for disabled people.

A memory stick illustrating with photos and videos the impact of the trial is presented with this response.

2. THE IMPACT OF THE TAVISTOCK-TORRINGTON TRIAL ON THE LOCAL COMMUNITY

2.1 Introduction

In November 2015 Camden Council set up a trial traffic system on Tavistock Place and Torrington Place, by means of an Experimental Traffic Order. The aim of the experiment was to:

- provide 'a safer and more attractive cycling route, which improves conditions for existing cyclists, while also encouraging new cyclists'
- reduce 'traffic on the route, improve air quality and provide a safer environment for the large numbers of pedestrians and cyclists in the area'
- trial 'wider cycle lanes'
- make 'streets that are easier to cross'

(Source: Camden Council document on Torrington-Tavistock Trial)

The trial has now run for 11 months and its impacts are clear. The trial may have succeeded in making a more attractive cycling route for some - but on Tavistock and Torrington Places only - and with severe consequences elsewhere. It should be noted that there is no evidence at all that it is safer. The displaced traffic caused by the trial has caused serious congestion in the surrounding streets, made surrounding streets more dangerous for cyclists and pedestrians, and has made air quality significantly worse. It has also caused emergency routes to be blocked off (see Appendix 2) with attendant risks to all in the area; and has made life more stressful and expensive for elderly and disabled people who need to access their homes by cars or taxis (and whose routes home are now often quadrupled in time and cost).



Judd Street



Tavistock Place



Hunter Street

Photos taken 20.01.16 between 13.45-13.30, illustrating displacement of traffic from Tavistock place on to Judd Street and Hunter Street

The Council documents notes that 'The road forms part of an important east / west cycle link'; this is true, but it also forms part of an important east-west link for local and through traffic. This was the only west-bound route between Euston Road and Holborn, and, as such, was an essential route for, and in frequent use by, emergency vehicles - and it has now been blocked off, with inevitable increased risk to lives. This is a high risk area with three major stations, three major hospitals and a recent history of terrorist attacks.

BRAG is supportive of the aims of the trial to provide safer cycling for local cyclists as well as those just passing through the area. However, it does object to the relegation of the needs and wishes of the residents - and particularly the needs of disabled residents - to a lower level of importance, evidenced by the priority focus on achieving wider two-way cycle lanes by eliminating a vital east-west vehicle lane. Residents' needs not only

extend to footpaths but also to vehicle lanes for everyday living. Residents also need the air quality improvements that the plan is claimed will deliver, but which in reality have worsened as a result of the trial.

BRAG's view is that the trial was set up hastily without due thought for the consequences, or proper identification and evaluation of other less radical alternatives that could have fewer detrimental impacts on the wider area.

The trial has failed to meet its key objectives – safer cycling and cleaner air:

- there is no evidence at all that the trial route is safer; there is however evidence that cyclists are having to negotiate much more congested and dangerous traffic in surrounding streets
- the evidence on pollution is incomplete, biased and misleading since the Council refused, in spite of being asked since November 2015, to monitor quality air in the surrounding streets where congestion and concentrations of diesel fumes are greatly increased. To claim cleaner air on account of the trial is disingenuous.

2.2 Congestion and pollution

The Council's data on changes arising from the trial reflect people's perceptions of greatly increased traffic; for instance in Judd Street morning rush-hour traffic north-bound has increased by 58%, and in Southampton Row north of Fisher street, morning rush-hour north-bound traffic has increased by 99%.

This increase in volume on surrounding streets has led to unprecedented congestion. This congestion in turn results in idling traffic, with diesel engines polluting densely residential streets for many hours per day.

Although the Council has been told by residents about this increased congestion and pollution in Judd Street and Hunter Street since last November, no monitoring of air quality has taken place in those streets, or on other severely affected streets such as Southampton Row. Monitoring has taken place in three places including Tavistock Square, where air quality has improved, and this has been heralded as a success. The failure of the scheme in causing increased pollution on other streets is being ignored.

What the Council has done is in fact to create more congestion and pollution, in the surrounding area. Traffic in Tavistock Place and surrounding streets used to be mobile, albeit often slow; now that same traffic is diverted on to fewer streets, it has become frequently stationary, making the total sum pollution undoubtedly much higher, give that idling engines cause more pollution.

On Judd Street, a journey of 140 metres which normally takes a car about 20 seconds, often now takes 9 minutes. In such congested times, therefore, each car is spewing fumes for 27 times as long as before the trial; so, counting the number of cars is of no use at all in assessing pollution increase. But this common sense conclusion drawn from daily observation cannot be tested because the Council has refused to measure the air quality on the streets worst affected by the trial.

The accounts of two local residents attest to the increased pollution:

I am in the care of the chest department at University College Hospital for treatment of a chronic chest condition. The standard of care and attention I receive is beyond

reproach. But the heroic efforts of the staff have to fight against against the pollutants from the displaced traffic.

The situation has been exacerbated by the recent additional changes related to the imposed one way traffic along Tavistock Place. In Judd Street we now have frequent long queues of stationary traffic including many taxicabs waiting for the lights to change at Euston Road. The pollution is now horrendous. Not only the smell. One can also taste the fumes. But the most toxic component (nitrous oxide) consists of particles which are invisible and odourless. They are so small that they are absorbed into the body via the lungs.

and:

Since Tavistock Place trial the traffic in all surrounding areas have become gridlocked, the pollution and noise has become unbearable. My once so lovely Bloomsbury has now become a health hazard. I am 83 years old and I used to sit on the Brunswick stairs outside the cinema for hours after my walk with my dog, watching the world go by. I can no longer do that as the fumes from the traffic in Brunswick Square / Hunter Street is no good for my health. So I have to go up to my flat with my windows shut. I feel now I am a prisoner in my own neighbourhood. Please take notice of your local residents and put Tavistock Place back to how it was when it was a pleasant place to live and walk in.

The Council does not have data on how many vehicle journeys are avoidable – ie how many will disappear if vehicle travel is made inconvenient by blocking roads, but their estimate is 11%. Blocking off some streets makes those journeys which do continue (and there are many necessary journeys for older and disabled people, deliveries to businesses and to residential areas etc) much longer. Alternative routes which have been proposed by the Council in meetings are often four or five times as long because of the road blocks, which, taking into account the anticipated 11% reduction, still results in at least a three-fold increase of traffic (because the remaining 89% are doing much longer journeys)– with three times as much pollution.

In short, the Council has failed to recognise the impact on pollution of displaced and idling traffic; and has failed to monitor the worst affected areas where pollution has increased. Claims to have improved air quality are misleading.

2.3 Impact on frail, older and disabled people

The Camden transport hierarchy is: pedestrians – cycling – public transport. On the basis of this the Council has prioritised cycling at the expense of everything else. In particular they Council has shamefully neglected the needs of frail, older and disabled people. The trial has caused a great deal of distress and has worsened mobility for many frail, older and disabled people.

The transport hierarchy ignores the fact that pedestrians – supposedly the highest priority – who cannot walk far, have to use public transport, which on the roads will be buses or taxis. The imposition of heavily engineered cycle lanes across London is causing bus journeys and taxi journeys to be greatly increased – and, in the case of taxis, much more expensive. The Tavistock trial has disadvantaged frail, older and disabled people in numerous ways, arising from both the blocking of routes and new prohibitions or impediments to dropping people off, in the following ways:

- a) Local taxi journeys can now take four times as long and cost four times as much (Letter from Liz Paul to CNJ 21.4.16); this additional cost is being imposed on a section of the community who are typically on lower than average incomes.

A residents asked her sister, who has disabilities, to give her account of visiting the area now:

My experiences of travelling around London these days can be extremely difficult. I live in Winchester and my sister lives in Kings Cross. Visiting her has become more and more problematic due to traffic congestion which has been made much worse by the increase in cycle lanes in recent years.

As a person with a physical disability, I find travel on the Underground and bus impossible, due to problems with balance which mean that I cannot use the escalators which are in most Tube stations, and I cannot cope with a large amount of people on public transport systems. Therefore, when I visit London, I am reliant on taxis which are becoming extremely expensive. It costs me £25 for a return train fare from Winchester to London. Then a cab fare from Waterloo Station to Wicklow Street (where my sister lives) costs up to £20. Before the Tavistock Place/Torrington Place double cycle lanes were installed, this fare used to be only £11-12.

The other option is for my sister to drive me - although this is immediately an issue as there are no spaces for cars to wait at Waterloo for her to collect me from there. She then uses a considerable amount of time and petrol to drive us to Wicklow Street.

Somewhat comically for someone in my situation, it seems that people with disabilities are to be encouraged to use bicycles. As a person with mobility, balance and coordination difficulties, I would be unable to do so. I am sure that I cannot be the only one!

Whilst I can appreciate the environmental advantages of cycling, I would urge you to please be aware that cycling is not an alternative available to everyone who lives in or visits London; and that disabled residents and visitors are negatively affected by the huge costs of car and taxi travel.

- b) The trial adversely affects particularly those people who have to make frequent journeys to hospital. A resident in Tavistock Place writes:

Whatever the strict legal position about east-bound vehicles entering the west-bound cycle track to pick up or drop off on the south side of Tavistock Place, taxi drivers generally will not do this because of the response from cyclists. Ambulances will park in the cycle track and they are tolerated. But generally, picking up and dropping off is now impossible on the south side.

One of the residents of Tamar House is 91 and has frequent hospital out-patient appointments. He has to walk to the corner of Woburn Place to pick up a taxi to the hospital. His balance is too poor to let him do the walk on his own so his independence is reduced. When he could pick up a taxi on the doorstep he could manage the journey to UCLH without help.

When he returns from a hospital appointment he is dropped off in Herbrand Street and has to walk back to his front door. This is a shorter distance than to Woburn Place but still difficult, given his mobility problems.

People arriving in wheelchairs have to be dropped off in the same way and need to be accompanied. In the past, they could be dropped outside Tamar House by a car or taxi travelling west so that the ramp unloaded onto the pavement. They could make the journey independently, with help from a taxi driver. They cannot now do that.

Pick-ups and drop-offs on Tavistock Place – north side

The difficulty is worse on the north side because cars and other vehicles cannot get to the kerb at all, in an emergency. This photo shows an ambulance blocking cars on May 24, while attending to someone on the north side of the road. Cars can be seen trying to use the cycle track on the south side to get round the obstruction. Dropping off on the north side was a problem before the trial, of course, but at least traffic was not completely blocked when a vehicle parked to deliver or pick-up.



Another drop-off difficulty on the north side can be seen at the Camden Chinese Community Centre, used largely by old people. If they arrive by minibus or other transport they have to reach the centre by crossing the cycle track. This is also not a problem linked to the trial but the blockage while dropping off takes place is new. Whatever decisions are taken about Tavistock Place traffic it should be possible to drop off old people beside the kerb, on both sides of the road.

The problems caused for older and disabled people on Tavistock Place were illustrated vividly recently in this photograph, where a passenger in a Camden bus could not alight on to the pavement but had to get out of the bus in the road:



Another Tavistock place resident writes:

We have limited dropping off and picking up needs, but we expect them to grow as we age. We also receive visitors and not all of whom are able to use public transport. Indeed as friends, they too tend to be of a certain age and feel more comfortable and safer using their own vehicles or taxis to travel around – many prefer to meet elsewhere than confront the difficulties.

While it is apparently legal for a taxi or car to enter a cycle track to drop off passengers, no driver or taxi-driver is willing to do so because they fear the abuse of cyclists or of drivers if they choose the alternative to block the one way road. They invariably choose to drop off or pick up on the corner of Herbrand Street.

This predilection notwithstanding, I have seen a taxi block the corner of Tavistock/Woburn Place, fearful of entering the cycle lane, to deposit an elderly woman with a zimmer frame. She had to balance the frame on the concrete divider, and then step out unsteadily into the stream of cycle traffic before she lost her balance... I have also seen on more than one occasion the bus driver, who delivers the elderly to The

Chinese Centre, gingerly shepherding 4 or 5 in his charge slowly across the road – the speed being dictated by their mobility problems.

- c) At the Marchmont Association meeting on 19th September, one resident described with obvious anxiety her experience and worries for the future about the increasing time and cost of her frequent journeys to UCH and Moorfields Hospital.
- d) Also at the above meeting, a question was raised as to the problems caused for people in wheelchairs wanting to be dropped off at the Tavistock Hotel, since the trial layout prevents their direct access to the hotel. The reply from the Council was that there would be no accommodation for people in wheelchairs arriving at the Tavistock Hotel; they will have to be dropped off across the road or round the corner on the next street. Unnecessarily making access for disabled people worse would not seem to be in line with Equality Act, and certainly out of line with the policy of 'pedestrians first'.
- e) Another aspect of this which has been raised with the Council is the need for constant non-emergency, but important, journeys between hospital sites. The UCLH group of hospitals includes specialist centres on sites to the east of the main campus around Tottenham Court Road –especially the National Hospital for Neurology and Neurosurgery (NHNN) in Queen Square which handles about a third of the UCLH trust's work. Patients from NHNN are regularly taken to Tottenham Court Road sites for treatments or tests which are not provided at the specialist Queen Square site. These journeys are now much longer. Some journeys may be by ambulance but there is a lot of patient traffic between sites which uses vehicles without blue lights. Journeys from Queen Square which used to take 15-20 minutes now take up to 45 minutes. At the BRAG meeting on 4th October one contributor said cited the following situations:
 - *A young tracheostomy patient was delayed in returning from UCH for 3 hours as a result of the Tavistock trial*
 - *Previous ambulance journeys which took around 10 minutes now take 45 minutes on a good day or sometimes over an hour*
 - *During peak times the average travel time from the Royal National Throat Nose and Ear Hospital in Gray's Inn Rd and the UCH campus has increased from 15 minutes to 37 minutes*

It is understood that UCH has expressed concern about this situation and, while wanting to see good provision for its cyclist staff, has asked the Council to consider changes to the west-bound route to address these delays for patients.

2.4 Impediment to emergency vehicles

The recent decision by Camden Council to cut off the westbound route on Tavistock Place (currently experimental until November 2016) has resulted in serious traffic congestion which has had a particular impact on emergency vehicles.

This has led to emergency vehicles having a key east-west route blocked (including the direct route to A&E) and to vehicles with blue lights being impeded and forced to drive at high speed down the wrong side of residential streets which are designated as emergency routes. Instances can be seen at:

<https://www.youtube.com/watch?v=6edM-sv9EmY>
<https://www.youtube.com/watch?v=eDOcXSwCiGE>

https://www.youtube.com/watch?v=JOj_0yhFwWQ .

There are other TfL/Camden Council plans in progress which would make congestion and access and freedom of movement for emergency vehicles even worse. This impeding of emergency vehicles is a new problem caused by the Tavistock trial.

A resident from Tavistock Place spoke to the paramedics about the one-way system while they looked after a neighbour being taken to hospital. They said there were delays getting to hospital; they said the one way system was going in the wrong direction and that east-to-west would work a lot better for them.

A discussion with a member of the fire service included the following points:

Camden can do what they want with their roads, they don't have to consult us. It's courteous if they ask us before they make changes, but they don't have to...Bollards don't really work. They're often put in without us knowing and we're not told where the key is. It can be quicker to go the long way round...Yes, the cycle infrastructure can sometimes be a problem – some is worse than others, especially the kerbs near the pavements which the vehicles can't straddle...You can really jam yourself up if you can't straddle the kerbs...It's just extremely difficult to get anywhere at the moment.

The map in Appendix 2 below shows emergency access routes in Camden, most of which are or would be adversely affected by the current and proposed changes.

Residents are aware that this is an area that has been a terrorist target (7/7) and is likely to continue to be a high risk area, given the proximity of three train stations, Eurostar, long distance rail passengers and a high density of tourists and commuters. There are also two major hospitals in the area, UCH, with its multiple sites including Queen's Square, and Great Ormond Street. The security implications of the traffic changes and the consequent gridlock, or of the further plans to block emergency routes, do not appear to have been considered with regard to the Tavistock Place one-way system.

The safety of people in the area should be the primary concern of the council and the Tavistock trial is making the area less safe by causing congestion and blocking emergency routes and thereby increasing response time.

2.5 Practicalities of daily life for residents

If central London is to remain a living community, the Council should be avoiding making daily life more problematic for ordinary people. There will be a tipping point at which the new stresses caused by imposed detrimental changes will drive people out, after which there is a risk of homes being predominantly bought up by absentee landlords, and consequent loss of community.

To keep the community thriving, there has to be care for the needs of frail, older and disabled people as outlined above, and attention to the needs of local businesses which are an essential part of city life; this is explained further in the section below.

However, there also has to be thought for ordinary people, be they singles, couples, or families. For normal everyday living they may need their relatives and friends to be able to access them with vehicles at times; they need deliveries; they may need to transport heavy objects from place to place; they may be sick or injured sometimes and need transport.

In Tavistock Place, where one might assume a welcome for the trial, there have been in fact increased problems for the daily lives of residents and the need for normal deliveries and unloading is a key issue. A resident writes:

The trial scheme takes too little account of the need for vehicles to park and unload along Tavistock Place. There is an unloading bay at the top of Herbrand Street but it is too small. The photos below show a van delivering laundry to hotels east of Herbrand Street. It takes up more than the bay by several feet. This sort of delivery takes more than a minute or two. There are similar long parks by vehicles bringing building materials, etc to buildings nearby. The Herbrand Street unloading bay is also sometimes used by ambulances because there are not always enough ambulance bays.



Asking residents to use the Herbrand Street unloading bay (assuming there is space) increases unloading times. A resident reports having to park for 45 minutes at a time when bringing crates of belongings home. The time was used carrying the crates about 50 yards along the street to the front door. Unloading would have taken about 5 minutes if it had been possible to park outside the front door, take crates inside with the front door left open, and then drive off.

Unloading is difficult enough on the south side of Tavistock Place but even more difficult for residents on the north side of Tavistock Place because of the need to cross the road, possibly heavily laden. And how are residents expected to move house? How far must furniture be carried along the pavement? The practical implications of this trial have not been thought through.

2.6 Impediment to local business deliveries.

The increased congestion caused by the trial has inevitably impacted on local businesses, whose survival is important to the local community and economy. To give some examples:

- A corner shop keeper said deliveries were being delayed by an hour and a half
- Staff in a local pub said business had dropped by 30% since last year
- A local hotel receptionist said it was difficult for guests to get taxis and deliveries were being delayed; sometimes they have had to be cancelled
- Staff at another local hotel said that taxis were taking 15 minutes longer now to get to the hotel (when they call them for guests leaving); there is now regularly 25 minutes wait. He said this is important as the whole stay could be a good experience and then it is marred at the end – which is bad for their reputation if guests are reviewing them.
- A local businessman writes:

In the capacity of both resident and manager of a building, I find that I need to organize numerous "white van" visits – workers with equipment... Traffic jams raising travel times, the congestion charge, parking charges, abandoned deliveries and parking fines all add to the cost of the services provided, which are passed on to residents even though many of these restrictive measures are intended to stop the flow from outside the residential area. The new cycle track scheme adds to these costs by increasing congestion and removing loading and unloading (formerly available on the North side of Tavistock Place). Moreover delivery services do not calculate these additional charges based on actual costs but their expected costs, so if there is an increase simply in the likelihood of not finding a loading or unloading space a charge is levied. This means that any loading/unloading area must have a surfeit of space to ensure a high probability of finding an open bay.

However, if we reverted to the original road layout which existed up to 2005, cycle lane east, next to vehicle line east, next to vehicle lane west, next to cycle lane west with no physical cycle lane dividers, there would be material advantages... during off-peak times there could be both loading and unloading and drop offs and pickups on to the pavements meeting the needs of residents rather than exclusive interest of transient traffic...

3. BRAG

- **Origins and principles**

Many hundreds of people woke up one morning in November last year to find their streets looking like this.



Not having been consulted, and in large part not having been informed, local people started to find out that this was a one year trial of a one-way traffic system on Tavistock Place.

Camden New Journal reported (26.11.2015) that Town Hall Transport Chief Cllr Phil Jones, who it is understand is going to be weighing up all the evidence for and against the scheme during this experimental year, said he was delighted by the scheme.

And in the meantime residents were drowning in diesel fumes, with up to 10 hours of stationary traffic outside their windows, unable to get around their own neighbourhood and seeing emergency vehicles being held up; and seeing cyclists and pedestrians risking their lives on the surrounding streets on to which all the west-bound traffic had been displaced.



Few of the founder members of BRAG received the information leaflet; many people only heard about the trial by word of mouth. The Council held a meeting on 10th March 2016 where it was clear that most people there were appalled by what was happening but it engendered very little confidence that residents' views would be heard and it seemed that their views were irrelevant to the decisions being made.

This lack of recognition of residents south of Euston Road is reinforced in Council documents which describe South Camden variously as a 'business and commercial area' in contrast to 'residential areas' in the north (Source: letter from Peta Sweet to CNJ 14.07.16); and as a 'leisure and entertainment area' (Source: Design and Access statement for planning application submitted for changes to property in Leigh Street).

A Council officer at one of the trial drop-in sessions asserted that not many people live in the area south of Euston Road. A review of the electoral register – which captures only part of the numbers of residents – indicates that the three wards are home to, at minimum, 20,669 people.

The many thousands of residents south of Euston Road seem to have been forgotten about or ignored.

So BRAG was set up to give these residents a voice.

BRAG's key principle is that residents matter. BRAG is not for or against pedestrians, cyclists or motorists. Indeed, amongst its membership they are probably all pedestrians, and many are cyclists and/or motorists; some of have disabilities; some need taxis and any of them might need emergency services. BRAG believes in all groups being accorded courtesy and respect and that this crowded city space should be shared in as fair a way as possible for the benefit of everyone.

BRAG members are local residents who are affected by the trial (and will be by the other planned changes), and who are suffering the consequences of the trial. BRAG has been seeking an inclusive traffic solution, taking account of the varied needs of all local people and visitors.

BRAG is in favour of well-designed cycle lanes, but they have to be planned taking account of the impact on the wider area. In the case of Tavistock the one way system has created congestion and pollution by displacing traffic; many streets which never had congestion before now have hours a day – with attendant pollution.

Also, BRAG would endorse the encouragement of people to use public transport. But in the Camden hierarchy, public transport is considered to be less important than cycling; and all across London buses are being slowed down hugely because of new cycle lanes – which does not encourage people to use it.

So BRAG is not saying no to cycle lanes at all, but rather that they are being designed piecemeal and without forethought for the wider impact, and that the needs of the whole community should be considered.

- **BRAG's local consultation and support**

As BRAG gathered support they found out that hundreds of other people felt the same way. They realised the tentacle effects of this scheme were being felt far and wide – from Gray's Inn Road to Fitzrovia. BRAG's inaugural meeting was on 26th May and since then hundreds of local people have joined BRAG as supporters, writing a comment on the website, signing the Petition or attending a Community Planning Day.

BRAG has been in contact with numerous local organisations: RNIB, UCH, the London Fire and Emergency Planning Authority, the Bedford Estate, the Bloomsbury Association, Marchmont Association, many hotels including the Tavistock, Royal National and Imperial, Camden Cyclists, the Licensed Taxi Drivers Association and many residents associations. They have written to Camden New Journal and had meetings with Council officers and members and with the MP.

- 928 people have signed the petition to date
- 116 people have either commented on the website's 'Have your say' section or joined as subscribers
- 75 people attended BRAG's public meeting on 4th October
- 70 people participated in BRAG's Community Planning Day on 8th September

Petition

To date, 928 people have signed the petition which declared:

The Tavistock-Torrington Trial, London WC1, (Experimental Traffic Order, commencing November 2015) has:

- *Created additional traffic congestion and pollution*
- *Made surrounding streets more dangerous for cyclists and pedestrians*
- *Severely restricted access for emergency vehicles, in this area of high terrorist risk*

The Tavistock-Torrington trial (Experimental Traffic Order) is a failure and I call for this Trial now to be abandoned.

Community Planning Day

70 people participated in a Community Planning Day held on 8th September 2016. Local people were invited to raise issues of concern, and to discuss solutions and future ideas about the neighbourhood. Concerns about traffic were raised as a major part of the discussions along with solutions for traffic problems. A full report on the day is being submitted along with this response.

BRAG public meeting on the Tavistock trial

75 people attended BRAG's public meeting on the Tavistock trial held on 4th October. Views for and against the trial were shared and at the end of the meeting, following the presentation of BRAG's alternative plan, there was overwhelming support for the motion calling for the Council to consider BRAG's alternative plan, with two-way traffic and two cycle lanes, as an alternative scheme for the Tavistock/Torrington corridor. The vote was: 41 for the motion; 3 against.

4. BRAG's alternative plan

4.1 Introduction to the alternative plan

Having researched the problem and consulted local people, businesses and cyclists, BRAG has identified an alternative 'compromise' approach which would meet the aims of the trial in providing wider and safer cycle lanes and making roads easier to cross, without causing any of the attendant problems of diverting traffic on to unsuitable and inappropriate local streets, increasing and extending congestion and air and noise pollution, blocking emergency routes and worsening access for disabled people.

The purpose of this section is to present an alternative plan for the consideration of the Council, residents, cyclists, the emergency services, disability groups and local businesses.

The plan would accommodate cyclists' preferred solution of separate unidirectional cycle lanes, as recommended for instance by the Cambridge Cycle Campaign. Discussions with local cyclists indicate that the widths in this plan would be acceptable. Cyclists from the group Camden Cyclists have stated that their own preferred width for separated cycle lanes would be 2.2m, which is higher than that set out by the Department of Transport, TfL and Camden Council. However, the preferences of this group could in fact be met on more than 60% of the proposed route, without imposition of unacceptable inconvenience and damaging consequences for other road users and residents.

4.2. The detailed proposal

4.2.1 RECOMMENDED STANDARDS FOR WIDTHS OF PEDESTRIAN FOOTPATHS, CYCLE LANES AND VEHICLE LANES.

Standards from the following documents have been adopted for the BRAG alternative plan: -

https://consultations.tfl.gov.uk/cycling/draft-london-cycling-design-standards/user_uploads/draft-lclds---all-chapters.pdf

<http://www.ciht.org.uk/en/document-summary/index.cfm/docid/055693F6-8DB0-4BBE-AA9FF1B5BC5E94122>

<https://www.gov.uk/government/publications/manual-for-streets>

http://www.idgo.ac.uk/design_guidance/factsheets/width_footways_footpaths.htm

From these documented national standards the following widths for footpaths, cycle lanes and practicable vehicle lanes have been derived and adopted in the BRAG alternative plan:

- Where the proportion of HGV and public service vehicles is lower than 10%, as in Tavistock Place, '*motor traffic lane widths may be reduced to between 2.5m and 2.9m*'. In view of the low level of delivery lorries in the area, and with professional advice, the minimum width for a single traffic lane in the plan is accepted as 2.75m.

- The Department of Transport Manual for Streets (2007) does not state a minimum width for pavements but the consensus view of 1.5m is accepted, with the adoption of the ideal 2m wherever possible. Where existing historical pavements are around 1.85m, these are assumed to be close enough to be acceptable as achieving desirable ideal standards, without any need to extend them further.
- It is understood that Camden Council's own preferred minimum widths are 3m for a traffic lane, and 2m for a unidirectional cycle lane, the legal, policy and evidence base for which is not known.

So, based on existing national standards, the minimum right-of-way (RoW) width, to accommodate two one-way cycle lanes, two pavements and two-way traffic is 11.5 metres, with the preferred width being 13.5 metres.

On the Tavistock-Torrington route, this minimum width is met on 100% on the route, and in large part significantly exceeded.

4.2.2 WIDTHS OF ROADS FROM JUNCTION OF TAVISTOCK PLACE AND JUDD STREET THROUGH TO THE JUNCTION OF TORRINGTON PLACE AND GOWER STREET

The east-west roads between have been measured between the junction of Tavistock Place and Judd Street through to the junction of Torrington Place and Gower Street (Waterstones). Road widths (Right of Way/RoW) vary between sections and within sections. The measurements set out below have been independently checked and are sufficiently robust to support the arguments which follow:

Junction of Tavistock Place and Judd Street:	RoW width = 13.6m
Junction of Tavistock Place/Marchmont Street:	RoW width = 13.4m
Tavistock Place/Marchmont St (Frank Harris):	RoW width = 12.3m
Junction of Tavistock Place and Woburn Place:	RoW width = 13.9m
Tavistock Square (Tavistock Hotel):	RoW width = 15.4m
Gordon Square (SOAS):	RoW width = 16.3m
Byng Place/Malet Street (Student Union):	RoW width = 22.7m
Torrington Place/Gower Street (Waterstones):	RoW width = 19.8m

4.2.3 IMPLICATIONS FOR POTENTIAL SHARE OF SPACE

As the right-of-way width ranges from 12.3m to 22.7m, all of the route under consideration meets and exceeds the minimum requirement of 11.5m. Furthermore, approximately 60% of the route comfortably exceeds the ideal requirement of 13.5m.

This would be sufficient width for two traffic lanes and two cycle lanes, in total compliance with national standards, meeting and exceeding the minimum widths, and meeting ideal widths in large part, ie: two traffic lanes of at least 2.75m throughout, and

pavements of 2m and cycle lanes of 2.2 m for 60% of the route. This layout is illustrated in Appendix 1.

On this factual evidence, BRAG's conclusion is that the planned changes that would follow the trial are unnecessary, and excessive for an area that cannot easily accommodate idealised and generous widths, which are out of line with national standards. Dismissal of this alternative plan would reinforce the widely held local view that the current plan is ideologically driven, regardless of costs to the local community and the environment.

BRAG's view is that this conservation area, which comprises buildings, parks and gardens, and its historical floor-scape, should all be preserved and protected for the entire community that live and work here, and not sacrificed to external traffic demands.

Free or easy circulation within this area is important to its livelihood and vibrancy. Diverting traffic elsewhere, restricting access, and egress, will stifle cultural and commercial prosperity, and turn the area into a ghost town, as has happened in many provincial town centres because of poorly considered traffic restrictions.

Therefore, consideration should be paid to the needs of local businesses, including the many hotels in the area, especially Cartwright Gardens and Tavistock Place, that rely for business on convenient taxi access for delivery of their guests and luggage so that they are able to continue to thrive, and whose presence contributes to the local economy.

4.2.4 DEMARCATIONS

Feedback from both cyclists and pedestrians indicates that they find the raised barriers of various types in between cyclists and traffic to be more of a problem than a help. There are reports of pedestrians tripping on them, at least one resulting in a trip to A&E. BRAG therefore suggests that the nature of the demarcation be reconsidered, and replaced simply with dotted white lines or rumble strips.

4.2.4 JUNCTIONS

Careful attention would be needed in the design of junctions, to ensure sufficient space for turning for large delivery lorries, in a way which is safe for all road users. Also, we would welcome consideration of staggered traffic signals so that cyclists and motor vehicles have individual signals and go through separately, to avoid confusion about right of way and reduce the potential for collision.

With regard to one particular junction, and in addition to abandonment of the trialled plan, the BRAG plan also calls for consideration of the reopening of the left turn into Marchmont Street towards Cartwright Gardens and Mabledon Place from the eastbound lane of Tavistock Place, the closure of which occurred in 2011. Over the preceding years this turn provided direct access on to one of the very few routes for taxis and commercial vans heading towards St Pancras and Kings Cross Stations from Bloomsbury. Since 2011, this traffic has been unnecessarily diverted onto the east section of Tavistock Place then Judd Street, Leigh Street and Thanet Street in order to reach the Mabledon Place/Euston Road right turn only junction. The earlier this traffic is removed from Tavistock Place onto Marchmont Street the greater the benefits for cyclists and for residents, and air quality.

It is appreciated that the prohibition of this turn was in response to accidents occurring at that corner. However, these accidents occurred when the cycle lane was bidirectional, which has been widely acknowledged as confusing and increasing risk; BRAG's plan would eliminate the bidirectional cycle lane and so reduce risk on that corner.

4.2.5 CONCLUSION

There is sufficient width on this east-west route, between the junction of Tavistock Place and Judd Street through to the junction of Torrington Place and Gower Street, to accommodate both the two new single-direction cycle lanes which have been installed and also two-way motor traffic. This plan conforms to, and in parts exceeds, national standards. For 20% of the route, the minimum width requirements for pavements, cycle lanes and traffic lanes set out in national standards are met or slightly exceeded; for 20% of the route, minimum standards for pavements and traffic lanes are met, and the ideal width for cycle lanes set out in national standards is met. For 60% of the route, ideal widths for pavements and cycle lanes are met and in parts exceeded. It will also be seen, from the consultation with cyclists referred to, that this plan not only meets and largely exceeds national cycle lane standards but also, for 60% of the route, meets Camden Cyclists' additional preferred width for unidirectional cycling lanes of 2.2m.

It is therefore proposed that the new cycle lanes be maintained, at a width of 2.2 m for 60% of the route, 2m for 20% of the route, and 1.7m for 20% of the route – (this minimum of 1.7m for a minority of the route would still be wider than the 1.5 width currently set out on part of the trial route) – and that two way motor traffic be permitted again on that route.

This would be a similar road layout to that of 15 years ago, which residents report worked well. Appendix 3 illustrates this.

5. The flawed consultation process

The consultation process with residents has been flawed throughout. A review of the process has identified six key points of the process which have been done incorrectly or improperly.

1. In the first place, the use of an Experimental Traffic order to make this change appears to have been deployed with the intention of circumventing consultation with residents. A traffic expert commented that it was unusual to use an ETO for such a large scheme; the normal use of ETOs was for much smaller interventions. A resident was told by a Council officer (whose name was not elicited unfortunately) that residents were not consulted because they would not have agreed – and this is a common point of view amongst residents.

So, the first point at which this process fell down was the use of the ETO to impose the system. This gives the appearance of being a cynical use of an ETO to avoid early consultation with residents, and leaves residents with a feeling that the methods employed by the Council have been underhand.

2. Before the trial, Camden Council consulted, according to the document they published last November: Transport for London, Camden Cycling Campaign, London Cycling Campaign, Living Streets, University College London and the University of London. In short, they consulted organisations they thought would support it. There is a conspicuous absence of residents in that list – and yet they

are the people who have to live with the consequences – and who have to pay for it.

So, the second flaw in the process was that the Council evidently did think about consultation insofar as it might give them the result they were seeking, and did undertake some very partisan consultation, but it would seem, cynically and deliberately excluded residents from that exercise.

3. The impression of the Council acting in bad faith with regard to consultation is increased when one looks at the planning application from the London School of Hygiene and Tropical Medicine (Application number 2015/3406/P), considered by the Development Control Committee in January 2016, which included the statement:

13.22 One such scheme is the Tavistock & Torrington Place Scheme, which is currently being trialled and is due to finish towards the end of next year. Once this trial period is finished the Council will be looking to fit permanent infrastructure to facilitate the scheme going forward. [Underlining added) This is no slip of the pen as the decision of the planning application was predicated in this change becoming permanent.

Also, in 2015, the Council approved the west end project and, as part of this, they approved 'Tavistock Place/Torrington Place east-west traffic reduction'.

This appearance of intent by the Council to make the trial layout permanent, long before the consultation results were to be known or trial evidence available, is reinforced by press and Twitter statements from Councillors, which do not lend any confidence that the decision making process will be evidence-based or objective.

So the third point is that the Council had already publicly declared its intention to make Tavistock trial to become permanent - making the trial consultation seem something of a sham.

4. When an ETO is being imposed, councils have a duty to inform affected people but this was done in inadequately. The ETO guidelines issued by the Department of Transport, in Section 1.4 of Draft Guidance for New Procedures for Traffic Orders 2012, requires local authorities'to inform those individuals and organisations likely to be affected as determined by the authority in a way or ways which is most appropriate in the circumstances'. Notifications were sent out but only to some households a few days before the work began on Tavistock Place. But for many – maybe most – people the road closure and its consequential congestion and pollution were a complete shock.

So, the fourth flawed point in the consultation was failing to follow the DoT requirement to notify all the people affected by the ETO.

5. The consultation document which was issued in September 2016 was supposed to go to every council tax payer, and BRAG was given this commitment at a meeting on 9th September. But it has not. At a public meeting in March the Council had apologised for the consultation documents about the five TfL/Camden schemes which were then underway being only very sketchily distributed, and explained that the reason for this was that the distribution was done by TfL. However, this recent consultation about Tavistock Place was done by Camden Council also done very imperfectly. Envelopes without names and addresses were posted through letter boxes in apparently random numbers (ie not in many cases according to the number of households). Posters were placed in Tavistock Place (where it is

assumed the Council would expect support) but not in surrounding streets (which were badly affected by the trial). This was belatedly partially rectified after protest.

So the fifth flaw is that not all household have received the consultation document as is legally required.

6. The way in which the consultation document is written is clearly biased. It appears not to have been professionally validated and flouts recognised standards for constructing questionnaires in numerous ways, but to focus on three aspects: the attempt to give an impression through unsubstantiated headline wording and pictures that making the trial permanent would be better; the misleading statements on safety and air quality; and the framing of the questions:

Headline and pictures



The front page pictures are as if from a cosmetic 'before and after' advert. The 'before the trial' picture is dull and grey and the 'after the trial/proposed layout' picture is bright and sunny. This is not an accident because they are the same basic photo which has been digitally enhanced – with sunshine added in the 'after' picture. So the photographs seek to trick the reader into believing the proposed layout will be better.

The document is entitled: 'Proposed improvement for walking and cycling'. It could equally well be headed: 'Proposal to close some roads and move traffic on to surrounding residential streets'. So the subtitle seeks to predispose consultees into believing that the change is an improvement.

Misleading statements on safety and air pollution

The document tells us that 'Collision data for the first half of 2016 is not yet available, but feedback gathered during the trial indicates that the route feels safer...for...cyclists.' This again is misleading because in effect it is saying that there is no evidence that the trial layout is safer but the Council nevertheless is implying that it is safer. Since safety for cyclists was one of the key aims and there is no evidence at all on this, it is astonishing that the Council will now be taking a decision without any evidence at all that its key aim has been met.

What is clear is that the trial has made surrounding streets more dangerous for cyclists



Cyclists in surrounding streets

The document tells the consultee that 'air quality has shown significant improvements'. This is simply not true, apart from in three sites chosen by the Council, including the trial route where all west-bound traffic is banned. These three pockets of improvement are clearly at the expense of giving many surrounding streets much worse air quality (see section on Congestion and Pollution above). The trial has made air quality worse, in many areas, with newly created idling traffic often for many hours a day, in numerous streets. So, this claim is at best disingenuous and misleading to the consultee.

In short, there is no evidence on safety and only misleading evidence on air quality, and yet the Council is trying to lead the reader to believe that both have improved.

The framing of the questions

In addition to this, the Council only allows one choice between two options – either keep it as it is now or go back to how it was before last November. As one residents commented: 'A bit like choosing between having a cold or flu'. How it is now does not work for local residents. And how it was before last November did not work well either. The Council offers no scope for any other alternative solutions, and it is totally confusing for anyone who wants to suggest an alternative.

This was pointed out to the Council a few days before publication of the consultation document and they said that people who did not want either how it is now or how it was last year, should vote no to Q6, yes to Q7 and say in Q8 that you want other options to be considered. The trouble with this is that, this advice was not presented with the questionnaire. A reasonable person who wants an alternative might assume a quite different approach – eg say yes to 6; no to 7; and then in the comments say 'Yes I like it how it is – ie the 2 cycle lanes – but I would like the traffic to be 2 way again' OR they could put no to both and then put a comment. So basically the questionnaire can be construed in different ways; a consultee who wants an alternative option might vote 'yes' or 'no' to questions 6 and 7. So, given the confusing nature of the questions, with their meaning being open to different interpretations, it is clear that analysis of the returns can yield no valid outcome.

Asked to comment on the validity of the questionnaire, Dr Michaela Benson, Reader in Sociology at Goldsmiths wrote:

As requested, please find below my opinion on the survey that has been set up by Camden council about the road layout trial in your area. I am responding to this survey as an impartial advisor and as Reader in Sociology with long-standing experience and knowledge of social research methods... Producing surveys that yield reliable information and knowledge is an important part of the professional standards for ethics in

the social sciences. It is against this background that you should read the following comments.

The first thing to say is that it is not clear how the council would - or indeed could - use this information effectively. This is because the framing of the survey - particularly questions 6 and 7 - mean that people are being led into having a straightforward opinion - yes or no. One of the consequences of this opposition is that the more complex and nuanced responses - regarding, for example, alternative traffic arrangements, or further concerns about disability, or pollution, and so on - will appear in the comments section. As the 'qualitative' section of this survey, those responses will necessarily be difficult to quantify, synthesise or summarise (assuming that there is the will to do so). In short, the survey as it stands makes it really difficult to gain a proper sense of how people feel about these changes.

So the sixth flaw in the consultation process is that the consultation document contains misleading information and uses a question framework which is not fit for purpose and cannot yield valid results.

6. Conclusion

6.1 In conclusion, the Tavistock trial has had numerous detrimental impacts on the local community; there is no evidence that it has made cycling safer, and the evidence on air quality is misleading.

6.2 Although the Council's primary concern should be its residents, the needs and wishes of local residents have been repeatedly overlooked in favour of transient cycle traffic and other non-resident parties with whom the Council chooses to consult.

6.3 BRAG was set up to be the voice of these residents. BRAG's key principle is that residents matter. BRAG is not for or against pedestrians, cyclists or motorists. Indeed, amongst its membership they are probably all pedestrians, and many are cyclists and/or motorists; some of have disabilities; some need taxis and any of them might need emergency services. BRAG believes in all groups being accorded courtesy and respect and that this crowded city space should be shared in as fair a way as possible for the benefit of everyone.

6.4 BRAG is in favour of cycle lanes, but they have to be designed taking account of the impact on the wider area.

6.5 BRAG has offered an alternative solution which has significant local support. This configuration would mean that cyclists have two, wide single-direction lanes, and that the current severe disadvantages of the new experimental one-way system (traffic congestion from Euston Road to Brunswick Square; increased risk of road traffic accidents with impatient drivers making u-turns; difficult cycling conditions with the increased traffic on Judd Street and Woburn Place; emergency vehicles being delayed and impeded; access for disabled people being made worse; west-bound traffic for all taking significantly longer, and so causing more pollution, small side streets being used as rat runs; increased traffic noise and pollution and consequent increased health risk to residents on Judd Street, Hunter Street, Southampton Row and surrounding streets; and access problems for local businesses) would be removed. The proposals are understood to be technically sound and to conform with all relevant national standards, and also meet Camden Cyclists' own ideal widths for 60% of the route.

6.6 BRAG asks Camden Council and all interested parties to consider these proposals as an alternative to the current Tavistock-Torrington trial.

APPENDIX

Appendix 1: BRAG's alternative proposal

Appendix 2: Emergency routes

Appendix 3: Historic photos showing road layout pre-2003 with two cycle lanes and two traffic lanes

Appendix 4: Report of Community Planning Day, 8th September

APPENDIX 1: BRAG'S ALTERNATIVE PROPOSAL

NB Widths on top two graphics (source: Camden Council) refer to road and cycle lanes only; they do not include pavement widths.

The diagram below shows the existing and trial road layout on Torrington Place / Tavistock Place.



The widths given above are average widths, and vary along the route due to the space available.

But when BRAG took a measure to the streets on October 11th we found

eastbound

westbound

At junction Tavistock Place and Judd Street

1.5m

2.2m

At junction Tavistock Place and Marchmont Street (west side)

1.8m

2.0m

At junction Tavistock Place and Marchmont Street (east side)

2.1m

2.1m

BRAG proposal



100% of the route
2.75m for traffic west bound and east bound

60% of the route	2.2m	2.2m
20% of the route	2.0m	2.0m
20% route	1.7m	1.7m

This is 100% compliant with national standards for all lane widths

The reference above to the narrowest parts of the trial route being 1.5m and 1.8m is relevant here because, in BRAG's plan a short section of the cycle route is 1.7m (although the majority is much

wider). The trial route, as currently set out, which has been welcomed by cyclists' groups and some councillors as good for cyclists, has a minimum width of 1.5m; therefore, BRAG's route with a minimum width of 1.7m is an improvement on the trial's minimum cycle widths and so should be at least as acceptable to cyclist's groups and councillors who support the trail layout.

APPENDIX 2: EMERGENCY ROUTES

Emergency routes in Camden (source: https://camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3440458&)



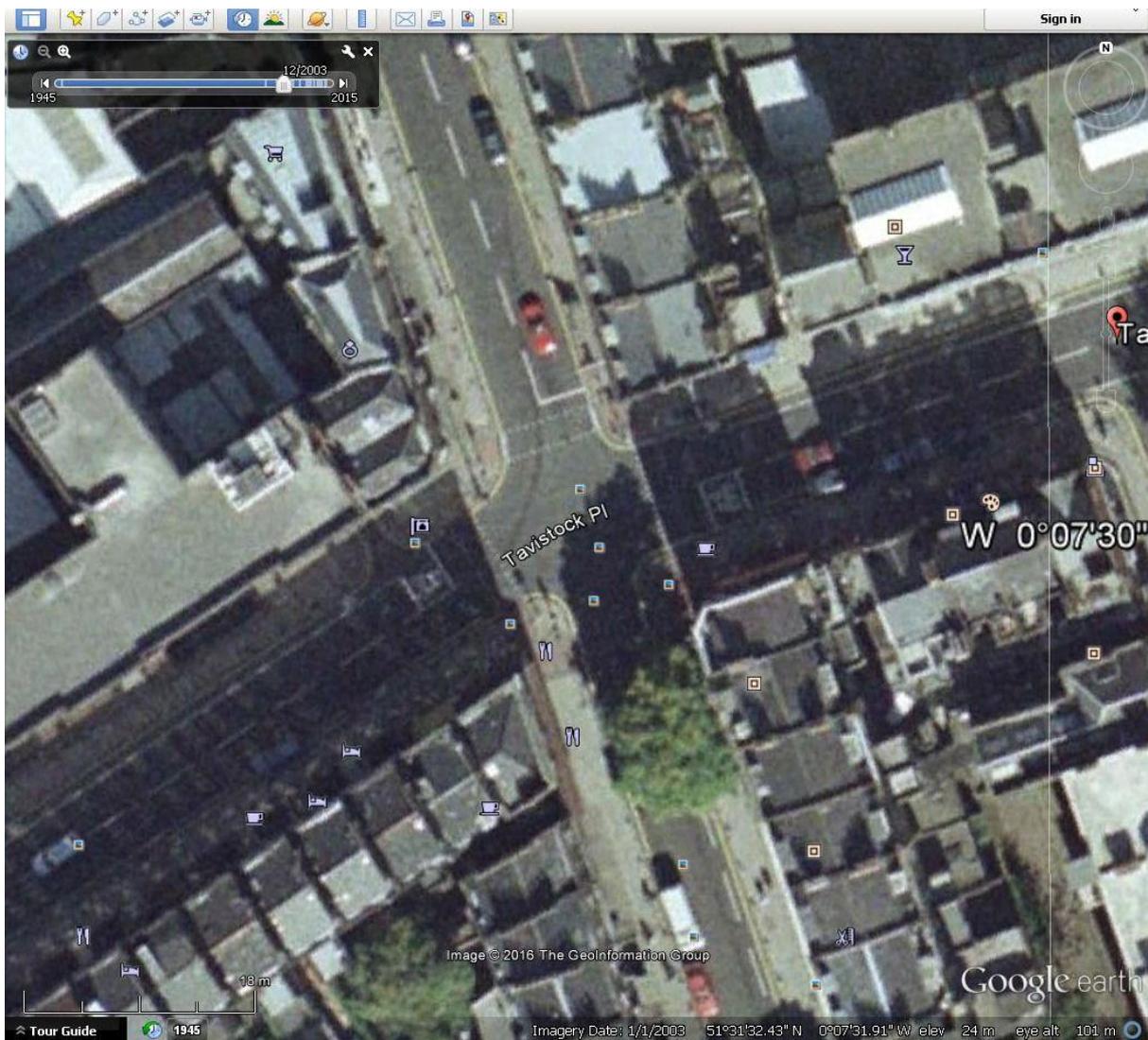
The red route west to east in the middle is Euston Road. Green indicates emergency routes. It can be seen that Judd Street and Hunter Street (now congested) and Tavistock Place (now one-way experimentally) are meant to be emergency routes but have been detrimentally affected by the recent change. Current TfL and Camden proposals for future changes would adversely affect other emergency routes, namely:

- Guilford Street
- Landsdowne Terrace
- Grenville Street
- Brunswick Square

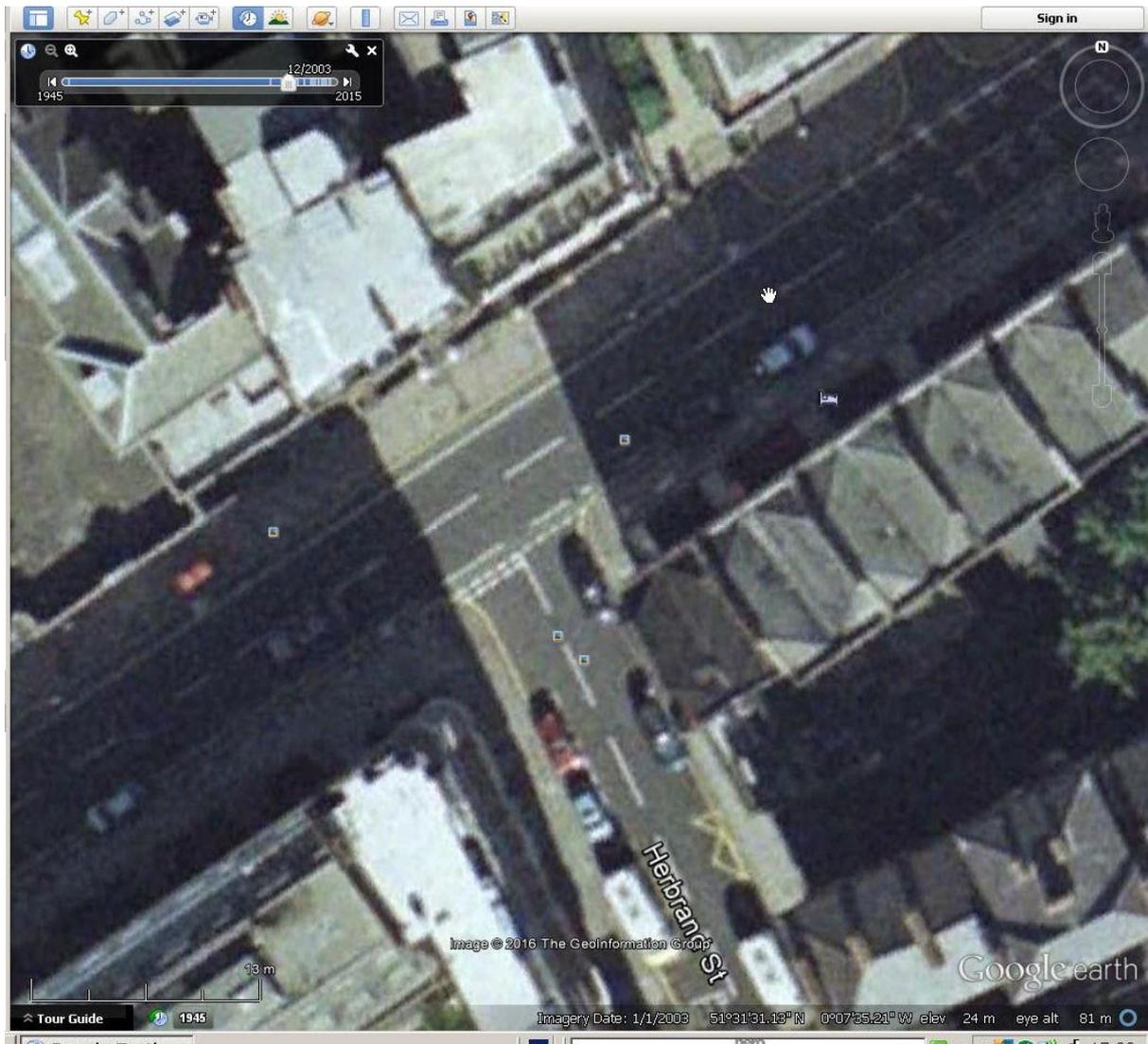
APPENDIX 3

Historic photos showing road layout pre-2005 with two cycle lanes and two traffic lanes

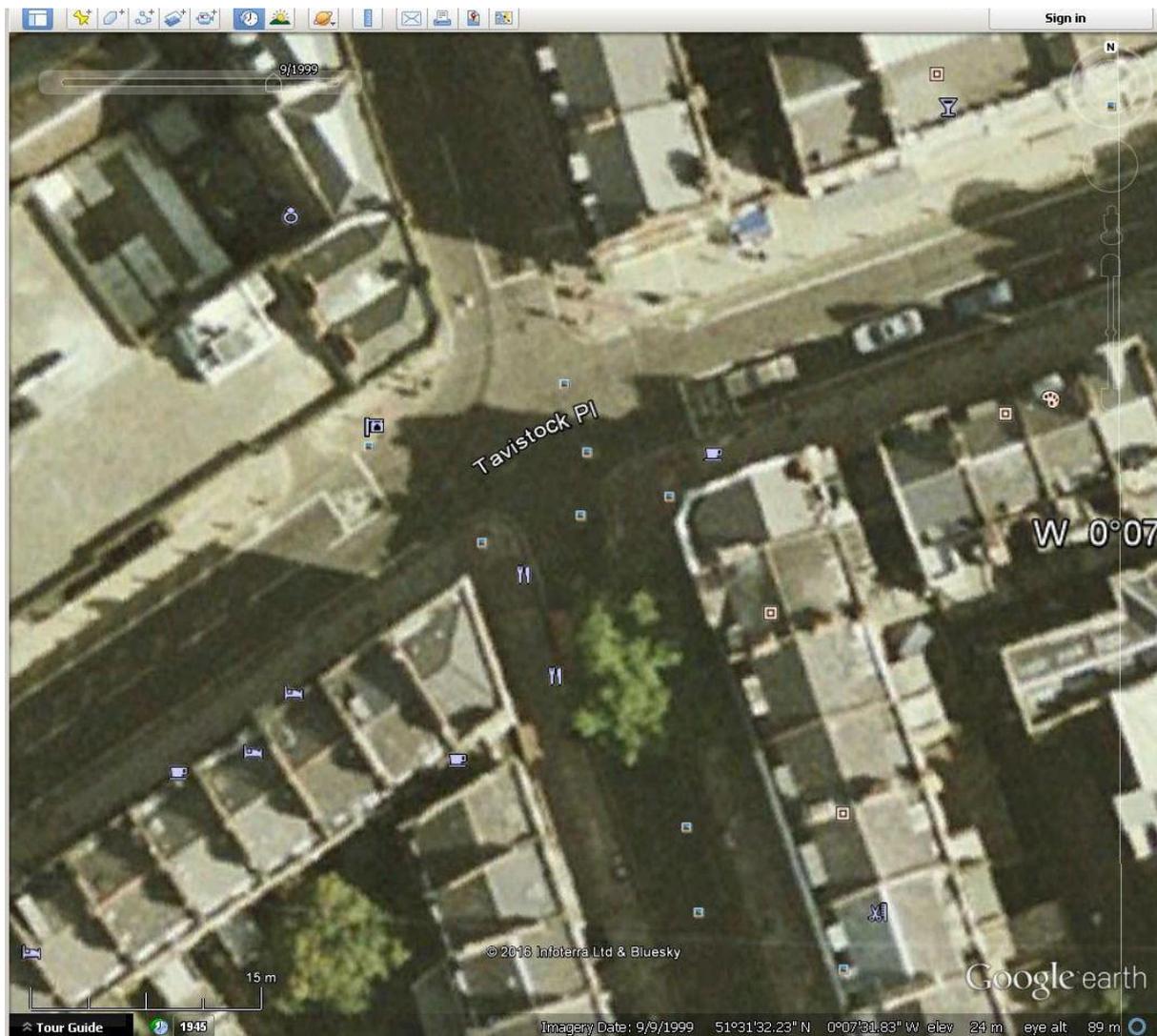
(Source: Google Earth)



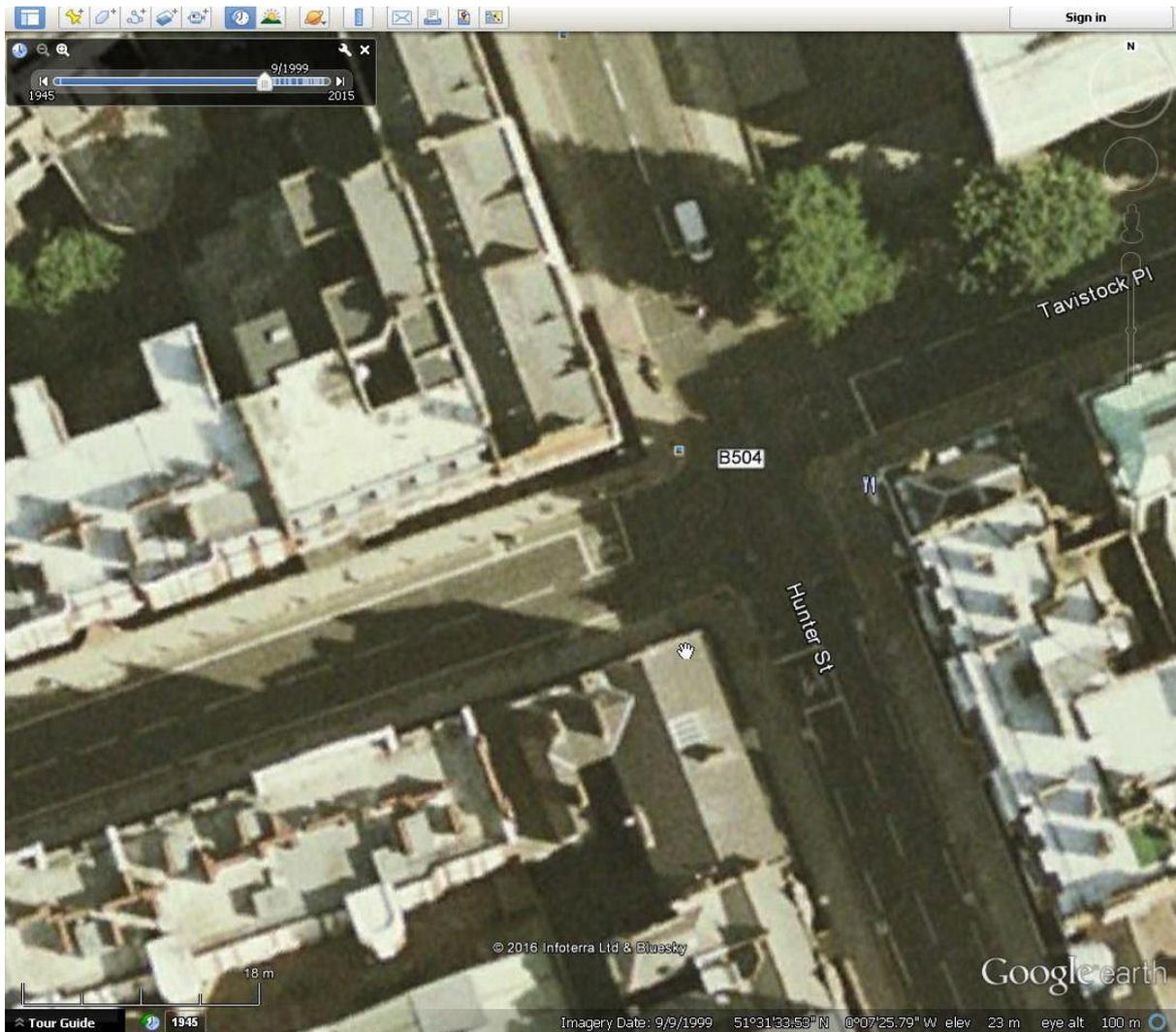
Junction of Tavistock Place and Marchmont Street (in 2003), showing two separate cycle lanes, – east- and west-bound, on Tavistock Place.



Junction of Tavistock Place and Herbrand Street (in 2003), showing two separate cycle lanes, – east- and west-bound, on Tavistock Place.



Junction of Tavistock Place and Marchmont Street (in 1999), showing two separate cycle lanes, – east- and west-bound, on Tavistock Place.



Junction of Tavistock Place and Judd Street/Hunter Street (in 1999), showing two separate cycle lanes, – east- and west-bound, – on Tavistock Place.



Junction of Tavistock Place and Herbrand Street (in 1999), showing two separate cycle lanes, – east- and west-bound, on Tavistock Place.