A24 Epsom Road Cycle Safety Improvements | March 2016

A response to from Get Sutton Cycling | London Cycling Campaign in Sutton

Consultation reference: https://consultations.tfl.gov.uk/cycling/a24-epsom-road (8 February 2016 to 11 March 2016).

Although the A24 Epsom Road is situated within the London Borough of Merton, the southern end of the road (at the intersection with Lower Morden Lane) forms the boundary with the London Borough of Sutton.

A summary of our response

- The proposals, as outlined, for the A24 Epsom Road, between Central Road in the north and Lower Morden Road in the south (a total distance of only 600 metres), are not supported.
- This section of the A24 has great potential for proving some first class facilities for cycling.
- The opportunity to deliver the very best cycling infrastructure is easier on Epsom Road than on many other sections of the A24, so the bar needs to be set high at the outset.
- Dedicated and protected north and southbound cycle lanes, plus redesigned junctions, are required to make cycling a real transport choice for everyone.

Do you support the proposals to improve cycle facilities along A24 Epsom Road between Central **Road and Lower Morden Lane?**

No.

We would, of course, support proposals that truly facilitated safe and inviting cycling on this section of the A24. In our view, the specific proposals outlined in this consultation will not achieve this, let alone deliver a consistent cycle facility in both directions. Consequently, we feel unable to support them.

Do you support the proposed new southbound cycle lane along A24 Epsom Road between **Central Road and Lower Morden Lane?**

No.

At the outset, it needs to be noted that the proposals, as outlined, do not suggest that a new southbound cycle lane is to be facilitated on the full section of Epsom Road between the junction with Central Road and the junction with Lower Morden Lane. In the proximity of these junctions, the suggested ideas for improvements are minimal and effectively non-existent. Both of these junctions require the development of interventions that will make cycling feel safe and inviting.

Within approximately 30 metres of the starting point of the proposed southbound cycle lane (just to the south of the junction with Central Road) the cycle lane effectively disappears, albeit temporarily, at the bus stop. (Bus stop 'MC' London Road / The George, served by around 16 buses an hour during the inter-peak Monday to Friday). Consequently, and despite the proposal to widened the carriageway here, cyclists starting from the traffic lights at the junction with Central Road will often be compelled to ignore the cycle lane and take the primary road position from the outset. Despite what vehicular cycling advocates claim, this strategy is ineffective and engenders conflict, horn abuse and 'punishment passes'. The provision of dedicated space for cycling, possibly to incorporate a floating bus stop, is required if the objective of delivering a "consistent cycle facility" is to be delivered.

A short distance further on, the proposed southbound cycle lane is deflected away from the kerb-side towards the right-hand side of the lane. From this point, the cycle lane is situated between the various oncarriageway parking bays on the left and the running traffic lane on the right. This is not a particularly appealing prospect for any road users, but certainly not for the most vulnerable.

There are several reasons why the location of the cycle lane, as proposed, is not supported. Firstly, this deflection necessitates the installation of the new traffic island (to protect parking), which in itself creates further problems. Drivers occupying the bays, and wishing to join the carriageway, may partially pull out and block the cycle lane. Secondly, the cycle lane from this point becomes totally compromised by its close proximity to the door zone (especially when considering the larger loading bays). This danger is further heightened by the downhill gradient of the southbound carriageway, which between Central Road and Holne Close is around 1 in 30. With this gradient it does not require a great deal of effort on a bicycle to reach the 30 mph speed limit. Consequently, a carelessly opened door here could inflict life changing or life ending injuries. Thirdly, this layout also renders bicycle users prone to the 'left hook' whereby drivers will pass closely and immediately turn left across a bicycle user's path to enter a parking bay. Fourthly, the junction build-outs, rather than improving visibility and safety for vehicles emerging from side roads, may encourage drivers to creep out further creating a bigger problem.

The provision of a dedicated, wide, southbound cycle lane, situated between the footway and the carriageway parking bays (with priority at junctions) would be our preferred intervention. It is recognised that the construction of a cycle path may require some loss of the existing grass verge, along with the repositioning of some existing street furniture including lamp columns, or a reduction in the width of the central reservation. However, this more expensive option will deliver a better outcome, and will set the bar for further interventions elsewhere on the A24.

Just to the south of Holne Close, and continuing to Rutland Drive, a new shared area for pedestrians and cyclists is proposed (access to which is to be facilitated by a new dropped kerb). Most of this section of footway (between the puffin crossing and Rutland Drive) is already shared use¹. Although it is recognised that references to shared use in this consultation relate to accessing the puffin (proposed toucan) crossing, rather than as an integral part of the cycle facility for the A24 itself, using shared footways for any aspect of cycling provision is now "old-thinking". Shared areas demonstrate a lack of aspiration, and are not compatible with high levels of cycle use². Consequently, the conversion of the pedestrian crossing (currently a puffin) to a toucan is not supported. It is effectively a toucan crossing already for those (few) who use the facility. Instead, along with the provision of a dedicated, wide, southbound cycle lane, situated between the footway and the carriageway parking bays (with priority at junctions), a new signalised facility, at the junction of Rutland Drive and Epsom Road is recommended. A high-quality design would enable safe cycle movements in all directions (including between route 208 and the A24) and would remove the requirement for shared use footways. This would almost certainly necessitate the relocation of bus stop 'MF' Rutland Drive northbound (on the west side of Epsom Road) and possibly stop 'MD' Rutland Drive southbound (on the east side) too.

Continuing south, and the junction with Lower Morden Lane (to the right, on the west side) is deadly. As one contributor said, when responding to this consultation, "...as you make the descent (on Epsom Road), you

¹ This conversion to what is effectively shared use (currently only demarcated through flimsy directional signage, and with no onfootway bollards) took place in 2012 (or slightly earlier) with the introduction of the Sustrans / London Borough of Sutton / London Borough of Merton "Greenway" route 208 between Sutton and Wimbledon. This route, complete with chicane barriers, and gated parks, is still not complete. Usage of route 208 by people on bicycles, and certainly within Sutton, is believed to be very low.

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This was recognised following phase 1 the consultation in the autumn of 2012 (see A24 London Road proposed cycling improvements https://consultations.tfl.gov.uk/betterjunctions/a24-london-road). The proposed improvements at the time included "Enabling less confident cyclists to share certain sections of footway with pedestrians on both Epsom Road and London Road". The post consultation report (November 2012) dropped this idea: "Following consultation, TfL has decided to proceed with a modified version of its proposed scheme on the A24 London Road......", and that "Having considered comments received, we will not be pursuing any areas of shared footway at this stage. This is due to the strength of feeling from respondents about the potential for conflict between pedestrians and cyclists". So over three years on, and with the caveat that now, in 2016, references to shared areas only relate to accessing the crossing, not a lot appears to have changed.

are terrorised by impatient drivers either pulling out of Lower Morden Lane or attempting to turn right into it". The new scheme does little, if anything, to reduce the danger here. There is also the junction with the low-trafficked Elm Road West (to the left, on the east side) to consider and be aware of too.

The repositioned traffic island just the north of the junction with Lower Morden Load (plus slight trimming of the central reservation), the intended result of which is presumably to provide a larger reservoir to accommodate the number of vehicles turning right from Epsom Road into Lower Morden Lane, will do little to make the right hand turn better for cyclists. In fact, a manoeuvre from the cycle lane (which has just deflected from the outside of the lane, back to kerbside at this point) could become more terrifying. With the terrain no longer declining, the speed differential between vehicular traffic continuing south on the A24 and the vulnerable cyclist wishing to turn right, will have increased. There is also concern that the repositioned traffic island will not leave sufficient space between the cycle lane and the cars thundering past in close proximity.

Immediately to the south of the junction with Lower Morden Lane, the proposed cycle lane disappears and the second traffic island creates a nasty pinch point where people on bicycles are forced to take primary position and the resultant abuse. The carriageway width here will be critical. It is not clear whether the modest widening of the carriageway, being proposed here by the repositioning of the traffic island, will make any difference.

Robust facilities for cycling provision are required at this busy intersection of Epsom Road, Lower Morden Lane and Elm Road West.

Do you support the proposed new northbound shared bus / cycle lane along A24 Epsom Road between Central Road and Lower Morden Lane?

No.

As is the case for the southbound cycle lane, the proposed new northbound shared bus / cycle lane it is not to be provided over the full length (600 metres) of the A24 between Lower Morden Road and Central Lane. In this northbound direction, the situation is slightly worse, because the shared lane simply runs out about 120 metres before the intersection with Central Road. The lane will end at a point where, arguably, it is most needed.

Starting at the southern end, by the busy intersection of Epsom Road and Lower Morden Lane, and travelling north, and the plan drawings provided do not appear to give any indication of the extent of the proposals to build a wider, better-aligned footway on the western side of Epsom Road.

Beyond the junction the carriageway widens, and it shortly after this that the proposed shared bus / cycle lane is to start. There seems to be an implicit assumption that a bus lane with no specific provision for cyclists is inherently safe and acceptable. Whilst bus lanes do provide some advantages they are no substitute for proper protected space. Bicycle users are still placed in conflict with motor vehicles such as buses, minibuses, taxis and motorcycles. Furthermore, people on bicycles in bus lanes (especially in the hoped for large numbers) may result in some delay to bus journeys. A separate, dedicated, cycle lane would be our preferred intervention. Space for this could be provided through either a reduction in the width of the central reservation, or ingress into the adjacent Morden Park.

The area of footway opposite Rutland Drive, shown as a new shared area for pedestrians and cyclists, along with the associated dropped, is presumably intended to facilitate cycle access to the upgraded pedestrian crossing. As mentioned in our response to the southbound lane, a more robust cycle-friendly, facility is required here. The footway on this west side of the road, starting at the puffin crossing and continuing north for just over 200 meters, is already shared use as part of the Sustrans route 208. This is of very little use for people cycling on the A24, and illustrates the ineffectiveness of a two-tier provision for cycling. High-quality cycling infrastructure is required, that is suitable for all (and facilities cycling along the A24 and route 208).

Do you support the proposals to upgrade the pedestrian crossing to a toucan crossing?

No.

Our response to the proposed new southbound cycle lane, above, mentions this crossing. Even if conversion of this crossing to a toucan is a technical, or legal, requirement to link in with the proposed shared areas, its conversion on a cost versus benefit basis is questioned³. Given the very low use of this facility (and noting that it already linked the existing shared footways) only tends to highlight the need for infrastructure that excels and delivers. The introduction of shared use areas, and toucan crossings, suggests that only low levels of cycling are expected now, and that only low levels of cycling are anticipated in the future.

Do you have any further comments?

In 2012, phase 1 of the scheme delivered some modest improvements over a section of the A24 London Road, between just south of Morden town centre and the approaches to the junction with Central Road. The proposals that are now outlined in phase 2, three years after the publication of the Mayor of London's Vision for Cycling (March 2013), appear to be a continuation of the same ideas. One of the differences for Epsom Road, in 2016, is that more of the painted southbound cycle lane is to be on the outside of designated parking and loading bays (rather than having the legibility of the route stopping and starting either side of the bays), whereas for London Road, in 2012, only a short section of the southbound route (just outside Morden town centre) had this facility. Furthermore, as was the case in 2012, no meaningful interventions are proposed at junctions. In 2016, a year that will see the opening in central London of Europe's longest substantially segregated city bike route, we would expect better.

The section of the A24, between Central Road in the north and Lower Morden Road in the south (a total distance of only 600 metres), has great potential for proving some first class facilities for cycling. It's wide, with two carriageways in each direction and, as the consultation notes, even with one carriageway in each direction removed "survey and modelling results show that there would be no impacts to traffic queues in the area". Perhaps this explains why this section of the A24 features for cycle improvements, and why narrower sections to the south (or at any of the junctions, or in the vicinity of the Morden gyratory) do not. Could it be a case of focusing on an area that is relatively easy to do something for "cyclists", and avoiding areas that are more challenging?

To be fair, taking the approach of doing what is easiest first is understandable. But this needs to be coupled with the bigger vision, a vision that is ambitious for cycling. So, if Epsom Road has the space for cycling infrastructure, why not construct the best cycling infrastructure along Epsom Road? After all, if not here, where? And if not here, what chance will there be for the more challenging sections of the A24 further south towards North Cheam⁴?

Our recommendation is for the current proposals to be reassessed. It's time to be ambitious, and it's time to deliver cycling infrastructure that excels and anticipates significant growth. The A24 needs cycling infrastructure that is transformative. The A24 needs infrastructure that will notably enhance the experience of cycling for the traditional commuter cyclist, and be a compelling proposition for everyone else too.

Charles Martin, on behalf of Get Sutton Cycling, 11 March 2016

³ Even if the cost of conversion of the crossing at £10,000 were to be only one-fiftieth of the cost of delivering our proposals (all figures approximate), arguably our proposals would have a significantly greater impact on cycling levels (and all the associated economic benefits resulting). Answers on a postcard!

⁴ For more on Get Sutton Cycling's ambitions for the A24, see <u>Destination North Cheam!</u> http://getsuttoncycling.org.uk/2015/12/05/north-cheam_says-yes/.