

Camberwell Green proposal - Southwark Cyclists official response

A .pdf version of this document is available [here](#). Includes notes from site visit 2015 / 08 / 03.

This Response to Consultation is split into two parts:

Part A, our detailed response to the proposed plans (pp.2)

Part B, responses to individual questions posed in [the online consultation](#) (pp.28)

SUMMARY:

- **Southwark Cyclists reject these proposals.**
- Southwark Council's proposals for Camberwell Green alterations do nothing to address serious safety issues for cyclists. In some cases they worsen them.
- These largely cosmetic alterations also miss several opportunities to substantially improve crossing times and safety for pedestrians.
- These proposals assume increasing traffic flow when TfL's own figures show car ownership, use, and miles travelled are all decreasing in this part of London. The Council's own figures and transport policy forecast a rise in cycle numbers.
- **We urge Southwark Council and Transport for London to reconsider their approach to this key junction and the Camberwell Green area. Space for cycling at the junction and/or a cycle bypass are feasible alternatives to their proposals and would enhance the retail / social / pedestrian environment as well.**

Present / contributing / working group:

Andy Cawdell (Co-ordinator, SC)

Mark RH (Traffic engineer 'a' London Borough)

Rik Andrew (LCC Junction Review Group)

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Paul Lowe (Cycling Instructor)

Other SC members:

Joe Parker (convening); Eleanor Margolies; Alastair Hanton; Francis Bancroft; Bruce Lynn; Sebastian Funk; Sally Eva; Angus Hewlett

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Part A

Southwark Cyclists' detailed response to the proposed plans

Part A, Southwark Cyclists' detailed response to the proposed plans

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1. Overall Summary

Southwark Cyclists reject / do not support this scheme. Overall it caters inadequately for pedal mode, and even decreases pedal safety on known high risk junctions. It also creates new adverse harm on well used (and high cycle flows count) routes with no strategic planning of appropriate alternative routes. This is in the context of increased pedal demand being planned by TfL in connecting town centres, as well as being a central aim of Southwark Council's own Cycling Strategy.

The role the main N/S route plays in the Strategic Road Network has not been adequately considered. The nature of motor traffic demands combines with pedal mode, and in many locations, safety to pedal mode is worsened significantly. For example, very long stretches of bus lanes are now removed, introducing new conflicts with cycles and heavy traffic.

We recommend this scheme is assessed urgently by TfL for their LCDS "Service Level" approach, both for the current situation and for this proposal. This is necessary to appropriately assess the impact of the planned changes and level of adverse harm to people cycling. The CLoS results must be published in the public domain.

Finally, the mooted improvements to pedestrian safety and convenience are marginal at best. In particular, the amount of pavement added outside Butterfly Walk is tiny (there will be hardly any relief for pavement congestion as a result - we have suggested relocating several bus stops to Orpheus Street, creating a new bus hub), crossing times at the Camberwell Green junction for formal crossings will remain slow, no diagonal crossings are planned, and informal crossing on Denmark Hill and Camberwell Green will continue, as unsafe for all modes as now.

We believe that the place / movement functions of this busy town centre - already a key retail/service/social destination in the Borough, as well as a movement hub - should be reconsidered. Denmark Hill and Camberwell Church Street in particular could be calmed substantially without impact on peak-time traffic capacity (currently gridlocked in any case).

2. Headline feedback

Camberwell Green Junction

- **Left hook hazards exist on every arm of the junction. In 2015 evidence is widely available which shows that these hazards are lethal. TfL and other authorities have recognised this, and a key component of the Better Junctions programme is the elimination of these hazards. Unfortunately, there has been no attempt at all to protect against them here, which is reason alone to reject this proposal.**
- Under the proposal, traffic speeds across the junction will remain very fast. Pedestrian crossing times will stay long. Cycle safety will still be terrible.
- A junction that feels like a race track so can't be used by anyone who doesn't drive/cycle/walk like a racer.
- Some of the approach roads to the junction are narrow but the space at the junction itself is massive and poorly used at present. The proposal does nothing to use this space better.
- The exit narrowing on Denmark Hill over a very wide junction creates significant risks to weaker/slower cyclists who tend to take the nearside position. The proposed wide nearside build out will force these cyclists into conflict on their exit from the junction with HGV, bus, and potentially fast moving vehicles. Removal of the existing very wide bus lane that starts at the exit of the junction, removes protection for nearside cyclists.

General considerations

- Cycling modes are severely disadvantaged. This proposal will make an already unsafe junction far worse for cycling even though cycle share is growing and motor share decreasing.
- Several opportunities exist to re-imagine this scheme with e.g.
 - Cycle bypasses around the other side of the green (via Medlar Rd);
 - A fully-segregated Camberwell Green main junction;
 - Moving the shopping centre car park entrance to Wren Rd;
 - Creating a T-junction at Coldharbour Lane;
 - A bus station created in Orpheus St to address congestion outside Butterfly Walk.
- Pedestrians will not appreciably gain from this proposal even though meeting their needs are part of the rationale for the scheme. Long islands ameliorate the problem of informal crossings but are fixing the symptom not the cause. It will still be very hard for pedestrians to cross the road along most of this busy shopping high street.
- Very large number of LGVs and coaches (many non-UK registered / operated) through A202 means any junction layout **must be absolutely clear and not require good/compliant driver behaviour as a condition of safety.**
- Denmark Hill and Camberwell Church Street do not feel like 20mph areas. Both these sections should be reimagined as pedestrian and cycling-centric places with informal crossing etc expected. **Slowing traffic speeds and investing in the public realm will have safety benefits - and massive economic ones.**

3. Alternative opportunities

We have considered a number of alternative proposals. Although some are mutually exclusive, collectively in combination they would substantially improve the junction safety, experience and comfort for all modes. They demonstrate that the scheme can be substantially re-imagined within the context of the wider network.

Cycle bypasses around the other side of the green (via Medlar Rd)

Cycles could safely bypass the entire junction area following Medlar Rd then either head north to the Elephant, or east around Camberwell Green down to Camberwell Church St then eastwards along Camberwell Church St towards Peckham, or south down either Wren St or Grove Lane. If the bypass was very well engineered, maintained, and waymarked, with lights appropriately phased to provide a green wave it could be as direct and higher capacity than the junction.

Fully segregated Camberwell Green junction

Following the newest suggestions of the LCC Junction Review Group, the junction itself could have left, ahead, and right-turning traffic filtered from each other on the approach with segregated cycle lanes. **TfL say this design is capacity-neutral**, and it would provide much greater cycle safety as well as more crossing time/opportunities for pedestrians.

Creating a T-junction at Coldharbour Lane / Moving the shopping centre car park entrance to Wren Rd

Similarly, a closure of Daneville Road to motor traffic at Denmark Hill would allow this tricky junction to be simplified into a T-junction. Again, pedestrians and cyclists would benefit and bus times need not be impacted with some shuffling of the bus stop locations. Cars can already access the car park on Grove Lane and a second entrance to compensate for the closure could be provided at Wren Road.

A bus station created in Orpheus St to address congestion outside Butterfly Walk.

A majority of bus stops outside Butterfly walk could be relocated to Orpheus Street, with a bus hub created along with retail space. This would turn a currently dead area into a far more useful one. This would greatly reduce pedestrian congestion (a stated motivation for the whole scheme) and allow Denmark Hill outside the arcade entrance to be greatly simplified. Segregated cycle lanes, planters, and several raised tables would improve the public realm and slow traffic speeds to benefit safety and retail considerations.

Lights on Camberwell Church St. westbound moved to jct/w Wren Road

The lights for the main junction could be moved back to Wren Road junction to allow more space and time to separate all modes and directions of traffic. The detail here would require a lot of thought to get right, but the conflict here at present (and in the proposed plans) suggest it is worth addressing this properly rather than fudging it. Camberwell Grove would also gain from modal/access filtering to enhance a pedestrianised area at the junction with Church St.

4. Supplementary comments noted by members at the site visit and online:

[Denmark Hill] Large pedestrian islands proposed here are a symptom of informal crossing the length of Denmark Hill and C. Ch. St. This is inherently unsafe for pedestrians, bad for retail, and excludes wheelchairs too. The place/movement function of these stretches of the road should be reexamined. Doesn't feel like a 20mph area at the moment, intimidating for all. Genuinely investing to facilitate informal ped crossings on D.Hill north of Coldharbour would necessitate lower traffic speeds and imply some lower volumes, but would seriously improve retail environment, safety for pedestrians as well as cyclists, and combat air pollution

[Butterfly Walk] Removal of bus lane southbound is terrible for cycling. 2 bus stops in a row too many for this space - move one to Orpheus St.

[Denmark Hill s/b approach to jct/w Daneville Rd] Removal of bus lane and allowing right turns will stack lots of traffic back on Denmark Hill s/b. Everyone will miss out but especially cyclists.

[Coldharbour PI] Kerb build-out with no space for cycling creates pinch point for cycling, unacceptable.

[Selbourne Rd, Wren Rd] Cosmetic improvements largely neutral for cycling safety.

[Daneville Rd] More use of this potential bypass for bikes

[Camberwell Grn junction] Junction itself still has a messy alignment and very wide distance for all modes to cross. Design does nothing to address traffic speeds through junction. Pedestrian crossing times still too long. Pinch points on E side caused by kerb buildouts and bus lane removal.

[Camberwell Green, east side] Continuation of bypass bike + (potentially) bus route. Lights timed to provide green wave in each direction so that this bypass feels as quick as road route.

[Medlar St.] Signed and protected cycle bypass E-W around other side of green via Medlar St and S on either Wren Rd or Grove Ln

[Camberwell Ch St jct/w Grove Lane] Cycle crossing from N or W tricky, turning across traffic. Pedestrian crossing removed.

[Camberwell Green main jct] Ch St north to Camberwell Rd, consider allowing only bus turns to preserve bus capacity.

[General comment] This is not a 'tweak-able' design. It is so poor they need a wholesale rethink.

[General comment] This is a junction even Bikeability Level 3 riders will struggle to use safely, let alone comfortably. This is at odds with the Cycle Strategy since most growth in riders will come from Bikeability L2 or lower.

[General comment] The council needs to re-evaluate the balance between place and movement functions. Denmark Hill (outside Butterfly Walk) and Camberwell Ch St (opposite Wren Rd) are already chokka with pedestrians - they should have much more retail potential. Traffic environment is severely impinging on this.

[General comment] Noise pollution alone let alone air pollution at this junction is terrible.

[General comment] This doesn't feel like a 20mph area.

[General comment] Orpheus St very underused at the moment, can be converted to a great bus Hub for all routes headed S or SW

[General comment] Bikes completely excluded from this proposal, safety substantially worse in many places through introduction of pinch points and loss of bus lanes with nothing to replace them.

[General comment] Need to find out if Southwark have turning analyses for any/all arms of the junction.

[Green junction, SE corner] Build outs don't address traffic (all modes) stacking up here from Camberwell Ch St. It could even make it worse..

[General comment] None of the ASLs protected at all.

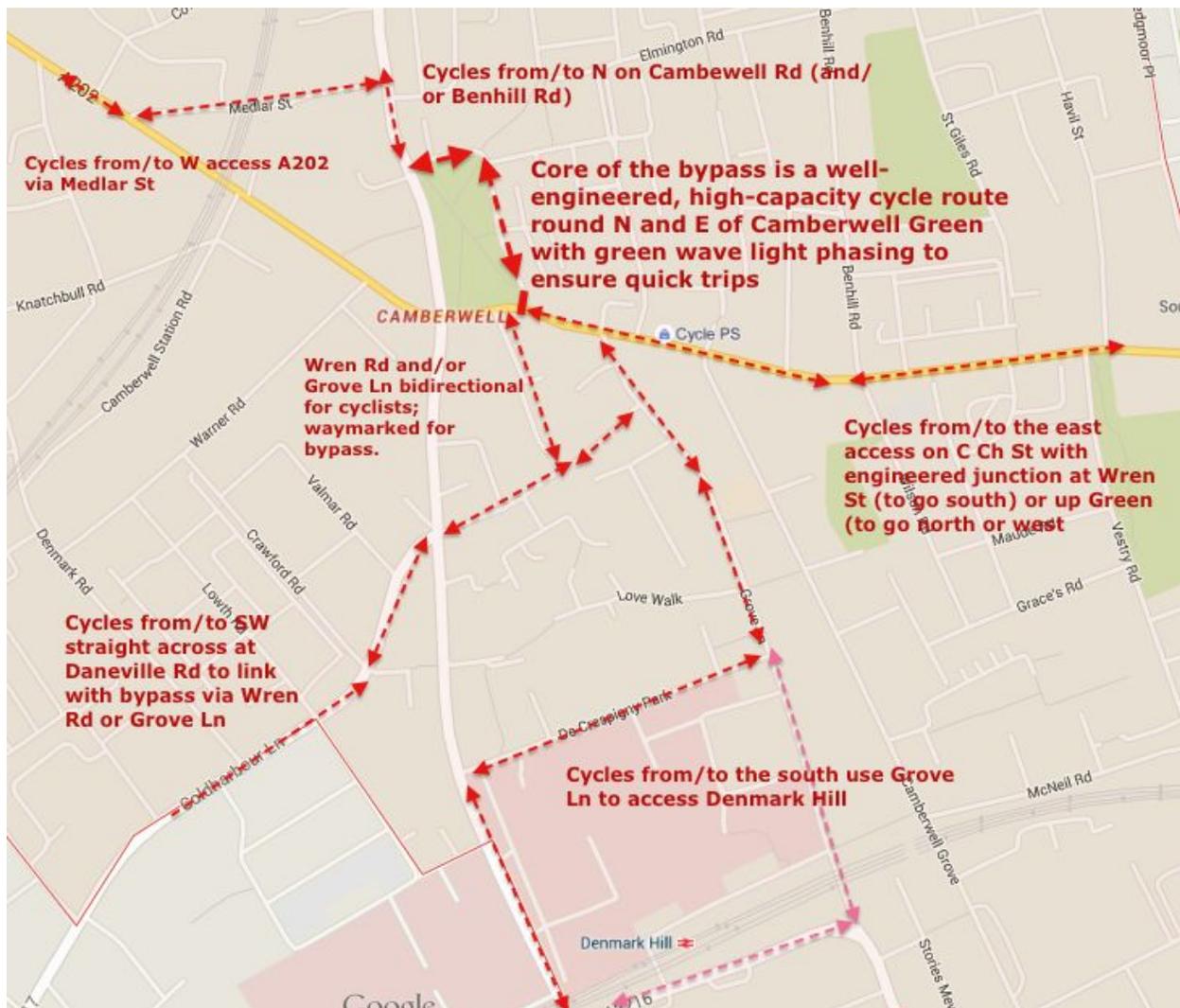
[Denmark Hill] No bus lane s/b - a significant loss. Bikes will be extremely squeezed, this could even be a no-go area for them...

[General comment] There are other tricky (trickier?) junctions *in London itself* that have tackled well as part of Better Junctions and/or CSH programmes. egs include Mile End (A11/A1205)

[General comment] Very large number of LGVs and coaches (many non-UK registered / operated) through here means any junction layout **must be absolutely clear** and **not require good/compliant driver behaviour as a condition of safety.**

[General comment] I would like to visit friends in Vauxhall and north of the river by bike. I would like to use the shops at Elephant & Castle. But I refuse to go through the current Camberwell Green junction, and this project, as has been said lots already, will fix nothing! I am very disappointed. I am one of the many bus passengers who go through this junction regularly. I wouldn't be on the bus if there was space for cycling instead.

5. Appendix i: Camberwell Green cycle bypass route



[King's College] cycle bypass route

Another option we discussed was making better use of the current cycle route through King's College Hospital.

The left turn into Bessemer Rd would need to be improved, then the right into Caldecot Rd, with Caldecot Rd made two way for cyclists, toucan crossing going over coldharbour lane into Lowth Rd, left into Warner Road, right into Denmark Rd, right into McDowall Rd, a rh and then a left into County Grove and then back onto Camberwell New Rd.

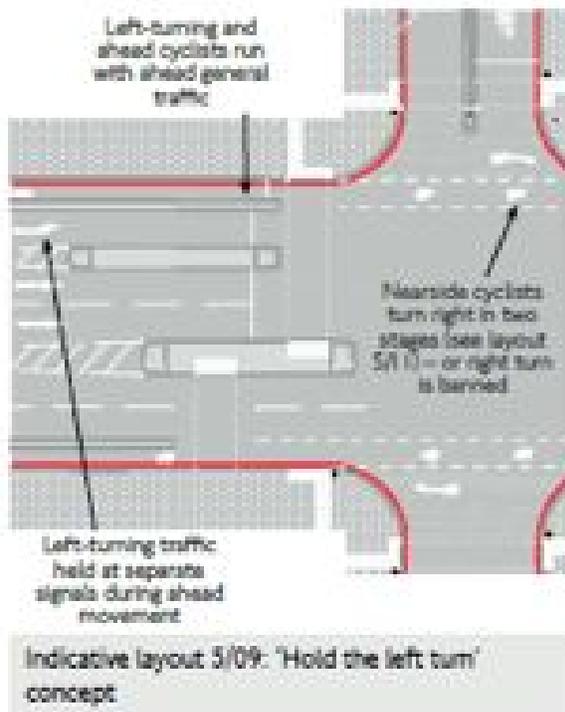
There may be some railway arches between Denmark Road and Knatchbull Road, facing Camberwell Station Road that might also be opened up and used as a through route (as at Vauxhall/CS5).

6. Appendix ii: Bruce Lynn's comments including counts (with permission)

Traffic flows (Daily) are given in Table 1, below. As we all know these are high flows. This means cyclists should be in segregated lanes. This is particularly important at junctions.

Note that numbers entering junction from Camb Ch St are greater than those on Camb New Rd indicating a lot of turning traffic, including I think a lot of left turning traffic. Cycle flows are similar on these roads indicating mostly straight on cyclists. The same applies to Den Hill compared with Camb Rd. So there are major left hooks, notably in my experience at Camberwell Church St to Denmark Hill and Den Hill to Camb New Rd.

Protecting cyclists at junctions needs not just segregation, but also light phasing that stops turning, especially left-turning, motor vehicles hitting cyclists. This can be separate light phase for cyclists. But this slows traffic and usually cyclists get only a very short phase. Note that at peak, cycle flows will approach motor flows despite the daily flows being much lower. This is because the cycle flow are much more concentrated at peak time than the motor flows. An alternative being supported by the LCC Infrastructure Group is to have separate phases for all left turning traffic. This is explained on the LCC web site and in the London Cycle Design Standard, a section of which is copied below:



5.4.5 Hold the left turn

TfL is planning to trial an arrangement that involves separately signalling cyclists and left-turning vehicles. This requires some segregation of lanes, a dedicated left-turning lane for general traffic, space for inclusion of islands for signal infrastructure, and provision for right-turning cyclists. It has potential for locations where there is a moderate volume of left-turning traffic and a large cycle flow ahead and/or left. Some separation at the stop line may also be needed of left-turning and ahead cyclists.



Visualisation showing proposal for 'hold the left turn'

This kind of arrangement would work well at Camberwell Green. It is helpful that 2 right turns are banned, which simplifies matters. The key points about this arrangement are:

1. Cyclists get the same green time as motor vehicles;
2. Pedestrians can have single stage crossings;

Properly engineered, it will still allow good general traffic flow.

Table 1: traffic flows (from Dept of Transport Av Daily flows stats)									
				Pedal cycles			All Motors		
Count location	Code number		E	W	E+W	E	W	E+W	
Camb New Rd	7534								
	3	2011	959	1041	2000	9599	12475	22074	
		2012	778	1306	2084	6466	7356	13822	
		Av 2011/12	868.5	1173. 5	2042	8032.5	9915.5	17948	
Camb Church St	1673								
	8	2011	962	1290	2252	11953	11195	23148	
		2012	988	1325	2313	11665	10933	22598	
		Av 2011/12	975	1307. 5	2282.5	11809	11064	22873	
			N	S	N+S	N	S	N+S	
Camberwell Rd	5677								
	1	2011	1289	1274	2563	8817	8433	17250	
		2012	1324	1309	2633	8674	8304	16978	
		Av 2011/12	1306. 5	1291. 5	2598	8745.5	8368.5	17114	

Denmark Hill	3681 6	2011	1579	1093	2672	14461	13167	27628
		2012	1622	1123	2745	14144	12892	27036
		<i>Av 2011/12</i>	<i>1600. 5</i>	<i>1108</i>	<i>2708.5</i>	<i>14302. 5</i>	<i>13029. 5</i>	<i>27332</i>

7. Appendix iii: Area Photos

Bus lane on exit of wide junction funnels general traffic away from nearside and. helps provide some space for pedal mode over very wide junction.



Bus lane on nearside helps provide some space for pedal mode over very wide junction.



High concentration of buses and bus stops means pedal mode forced into offside location. Narrowing the junction will increase the dangers (and pedal conflict with general traffic) if the bus lane is removed and not alternatives to current cycle demands are made to mitigate this risk.







Busses on Denmark Hill - hardly any room for cycles now, which will be exacerbated by new right turn into Coldharbour Lane.





This bus lane on Denmark Hill will be removed by the proposed changes, partly to allow traffic to turn right onto Coldharbour Lane. This will significantly worsen traffic conditions and a new left turn will introduce a new left hook hazard where none currently exists.



8. Appendix iv: Notes from Rik Andrew, LCC Junction Review Group (with permission)

I thought this would be a (relatively) straightforward one- like CS2@Mile End - as there is space thru the jct itself **but** the approaches and exits are a nightmare here. There is an awful lot of bus stop contention i.e. conflict with (a) buses pulling in / out (b) passengers getting on / off which we need to give as much thought to as the jct design herein other cases we would say "move the bus stops away from the jct"but there isn't much scope to do that here - except A215(N).

Given this situation it might be better to propose the latest (JD)2-lane variant of the **Cycle Segregated Junction** (attached, below as **Appendix v**) which would then give us more space to play with on the approaches & exits, especially around the bus stops.

The **first** thing cyclists need (even with bad old style jcts) is long (queue-length) kerbside cycle lanes into the jct on all 4 approaches which should be at least mandatory (preferably protected).

The best thing about their consultation draft is the banned W-to-S right turn / re-routeing via Medlar which will stop all the chaos we observed - and we should acknowledge this **but** surely there is no need for the W-to-N left turn?

- banning it would eliminate 1 left hook;
- and we could have a C-lane into the jct from bus stop H.

What about the left hook risk into Medlar?

- it should be possible to "hold the lefts" at jct Medlar/A202 as you only need 2 lanes here (left only / ahead only).

The A215(N) to A202(W) right turn appears to be banned- which makes sense (drivers have other route options)but there doesn't seem to be scope for any other banned turns.

On approach from A215(N) there should be a left turn **only** lane (not mixed)and a (single) straight ahead only lane; the new seg.jct design (all variants)is all about improving lane discipline & **not** having extra lanes thru jcts which stimulates aggressive / competitive driving they should only have a **single** exit lane for gen,traffic (all exits).

I like the idea of routeing S-bound cyclists across/around the Green then via Wren - bypassing both A215 bus stops & the Orpheus left hook. The new toucan can be sync'd with the main lights (no delay)and it will provide a second **good** ped crossing pt to the Green so there is **no need** for the long A202 island - it has to go -

- we need that space for a cycle lane into the jct (W-bd)
- and a bus stop bypass (E-bd)

I assume(?) this was intended to be for S-bd cyclist only (not 2-way) therefore N-bd cyclists would need a mandatory cycle lane on A215(S) into the A202 jct starting back at jct/w Coldharbour. Plenty of space for it: hatching + island wastes space.

Having done that, we need to ensure that as many buses as possible stop at Q and P (now no conflict) and as few as possible stop on A202 which is clearly a high demand E-W cycle route (here) I would like to get rid of bus stop L on A202(S) completely as this approach to the junction is the worst for cyclists: ditto the other loading bay - which their plan says should be relocated (good) but not to anywhere near Grove Lane... what we need here is a **continuous** A202 C-lane into the junction from as far back as possible - at least Grove & no paved build outs!

On A202(N) there is plenty of space to bypass bus stop K either outside (wide bus lane) or preferably inside (floating) but it should be shorter - to allow for the new toucan. There is also plenty of space to bypass bus stop F&E (either way) but appears to be less space at bus stop J - however, see above, if there is only one E-bound traffic lane we should at least be able to semi-inset it within a bus/cycle lane (as per Jamaica Rd)

Also it's a bad idea to have bus stops opposite each other...

Lastly do we still want to close off the left hook at Orpheus St? Or do we assume 100% compliance with the cycle bypass?

Non-Solutions at **BUSY** Junctions

❖ Advanced Stop Lines

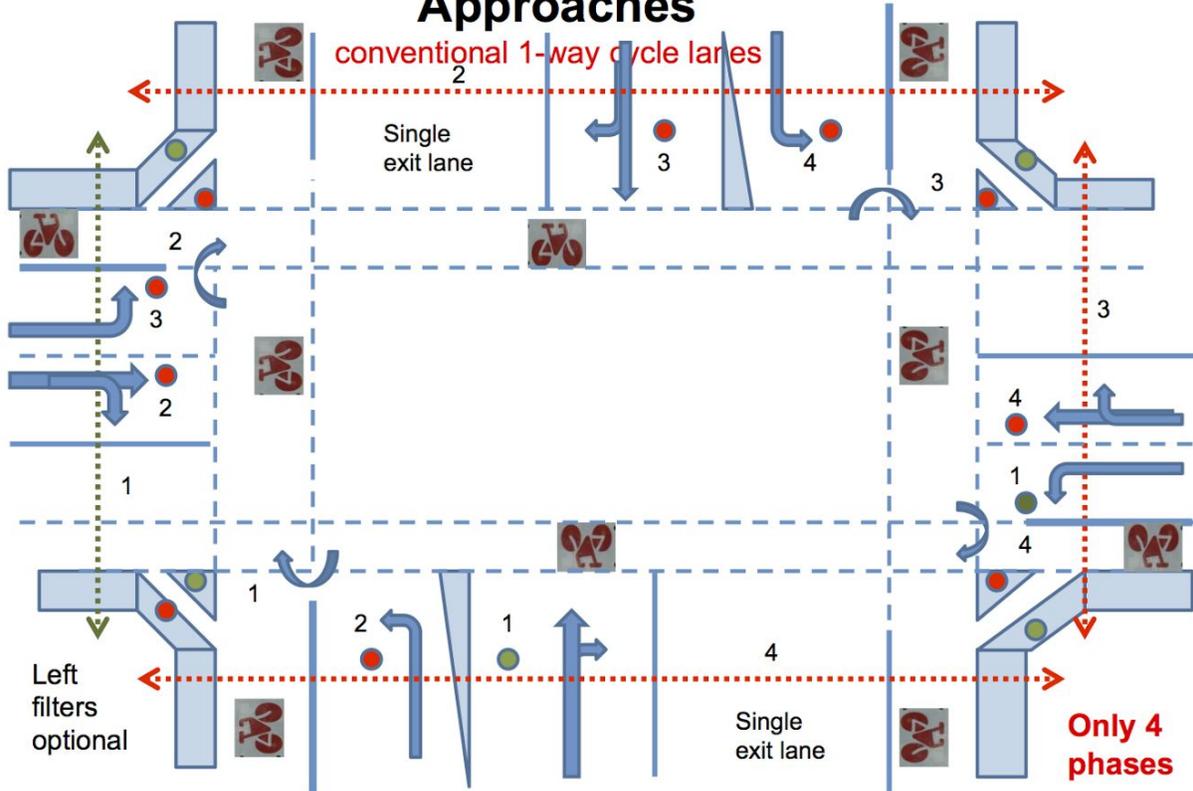
- no use when lights are green
- put cycles in max. risk position
- NB all fatal junctions have ASLs

❖ 'Early Start / Release'

- confusing & misleading
- only first 2 or 3 get across
- tail and middle : **same** left hook risk
- **UNSAFE** no matter how many secs start

... these are both false 'facilities'

Secondary X-roads : only 2 T-Lanes on Approaches



Secondary roads can have cycle lights & (protected) lanes too

Secondary (2-Lane) X-roads - Design Notes

- ✓ Light segregation on secondary roads [armadillo / wand
- ✓ **Cyclists : 2-stage right turns : all 4 arms** [No ASLs
- 1. N-bd Ahead + Right GO together [dominant a.m
and E to S left turners [cycle + motor
N-bd Peds & Cyclists cross *at same time*
- 2. S-Bd Ahead & Right GO together [dominant
p.m
and W to N left turners [cycle + motor
S-bd Peds & Cyclists cross *at same time*
- 3. Repeat above for E-bd Ahead & Right [+peds
+cycles
- 4. Repeat above for W-bd Ahead & Right [+peds
+cycle
- ✓ ***No conflicts between modes in any phase***

10. Appendix vi: Visualisation of LCC Junction Review Group design on Camberwell Green

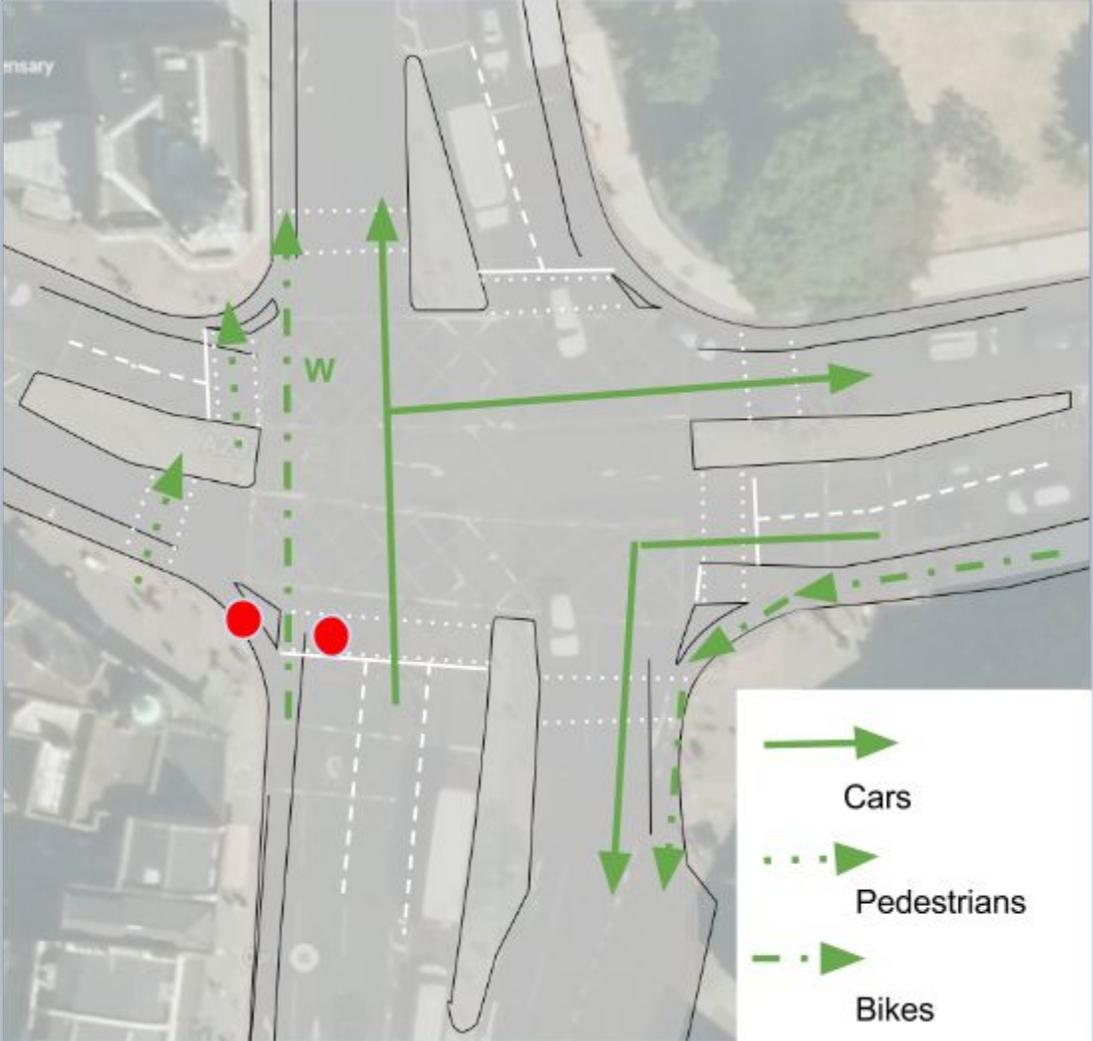
Visualisation of the junction. Measurements are approximate. By Joe Parker (any errors his).

There is space to have 2 motor traffic lanes leading to each junction (3 on Denmark Hill) **and** all cycle lanes segregated with kerbs. No space at all has been taken from the footway.

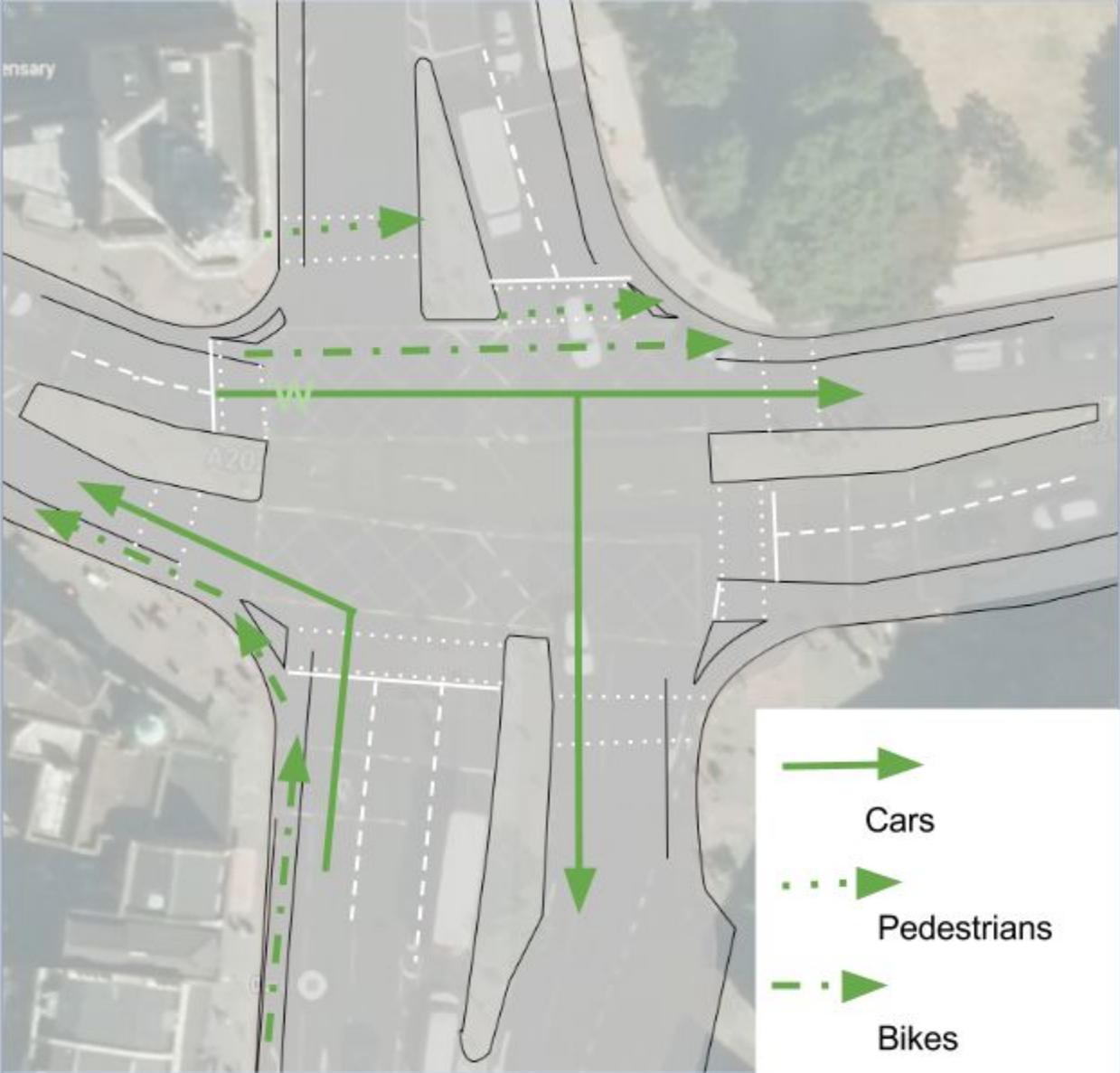
Motor traffic filtered on every arm of the junction so that the offside lane turns right and straight ahead; each nearside lane turns left only.



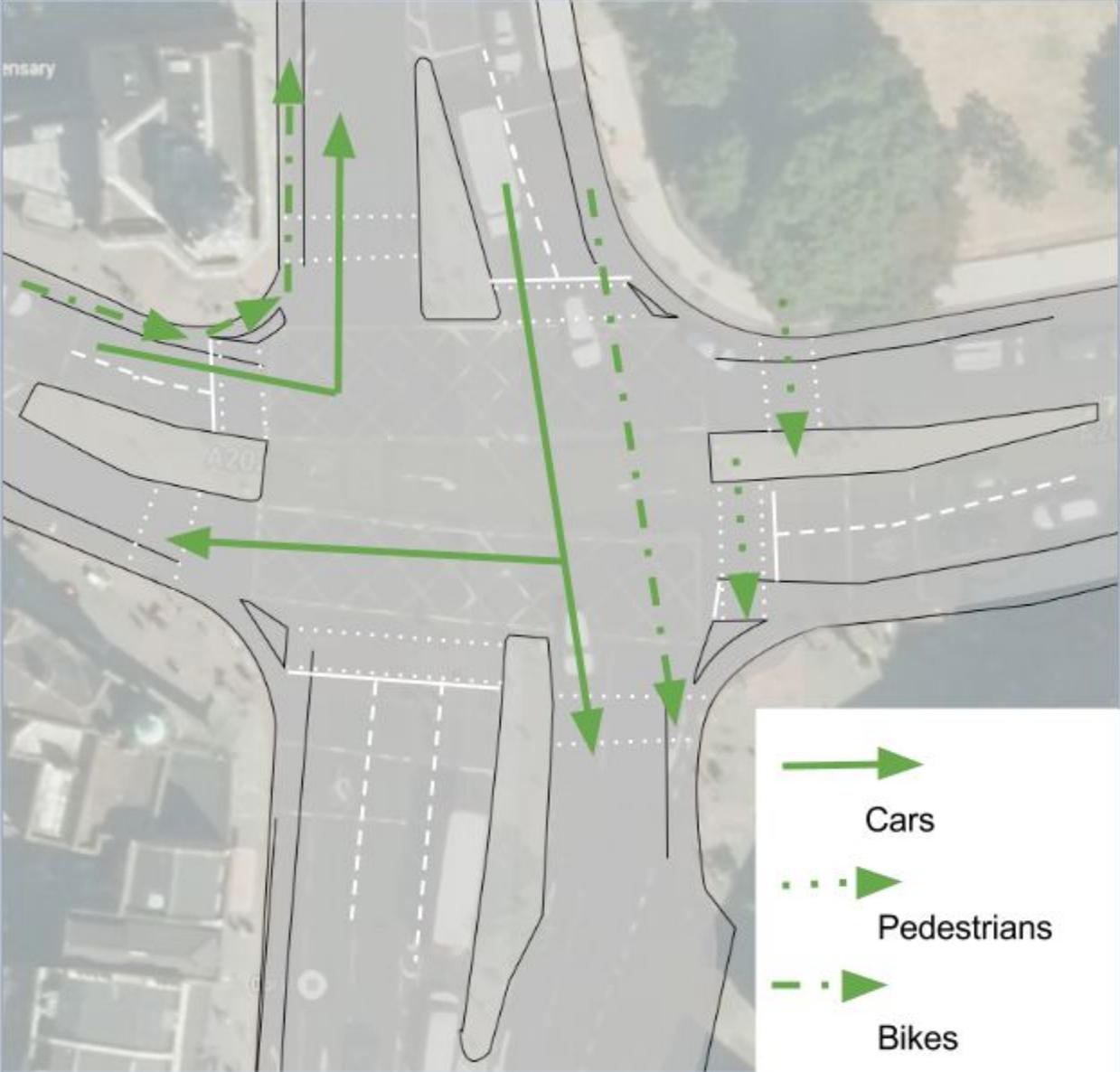
Phase 1: Pedestrians, bikes, and cycles all head North. Bikes wishing to turn West (left) are held at the corner marked by the red dot, as are cars. Bikes wishing to turn East (right) move ahead to the waiting area marked 'W' and wait for the next phase of lights.



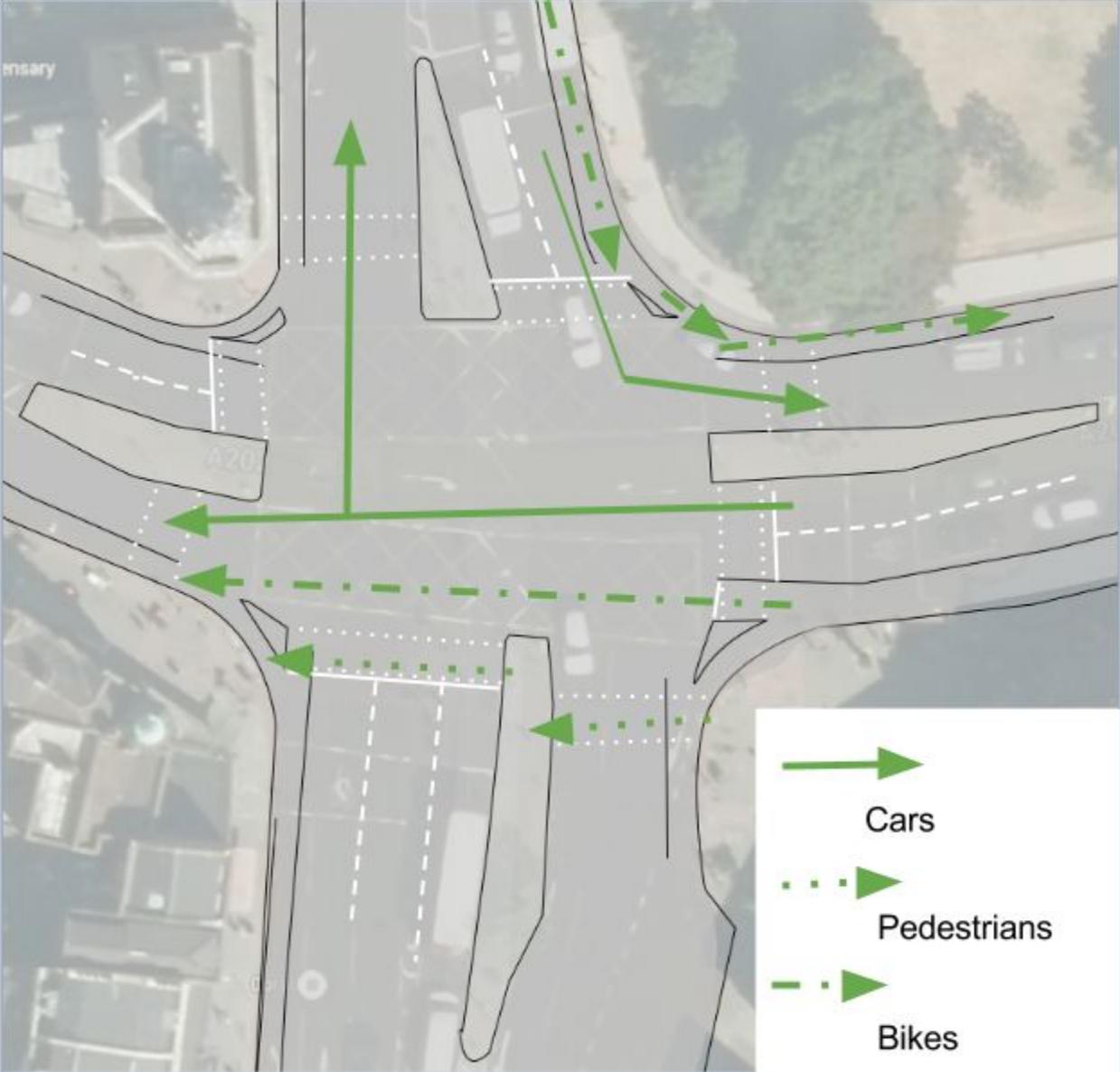
Phase 2: The phases of the lights move round the junction clockwise, with the same movement pattern. Cyclists from the South who want to head East towards Peckham and waited at 'W' in Phase 1 now cycle off with the straight-ahead cyclists. The bikes and motor traffic from the South that wanted to turn West / left in Phase 1 now do so on their own filtered traffic lights.



Phase 3: Continues clockwise...



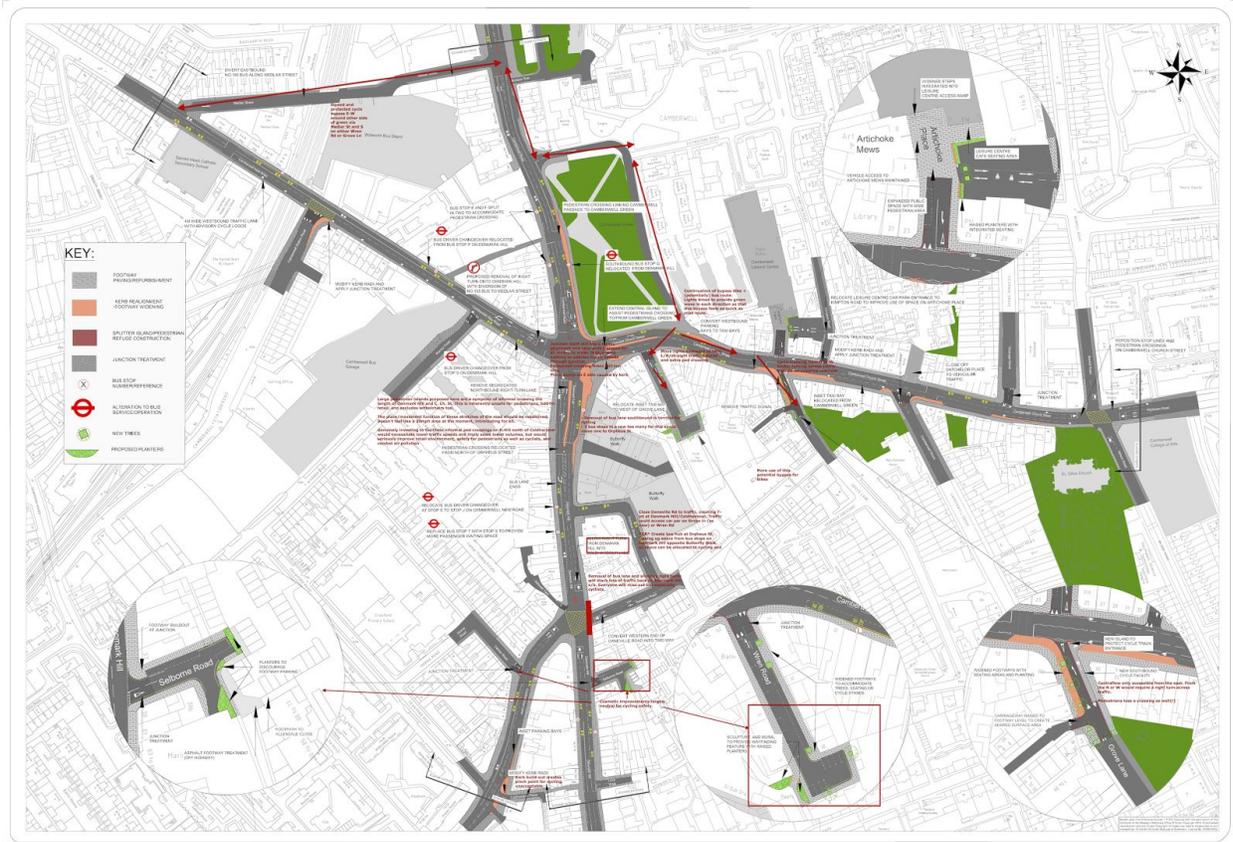
Phase 4: The final phase clockwise. The next set of lights will go back to Phase 1.



11. Appendix vi: Annotated Camberwell Green Scheme overview plans

Copy of the proposed Camberwell Green overview plan, annotated with some of our comments. A high-resolution .pdf version of this drawing is available at:

http://southwarkcyclists.org.uk/wp-content/uploads/2015/08/Camberwell_TC-Overall_plan_SouthwarkCyclesAnnotated.pdf



Part B

Responses to individual questions posed in the online consultation

Part B, responses to individual questions posed in the online consultation.

A. Town centre improvements

2 Please provide your comments and feedback on the General arrangements plan

Southwark Cyclists reject/oppose this proposal. Our full response is at <http://bit.ly/1TxKlkq> (.pdf)

Southwark Cyclists is the local Borough Group in Southwark of London Cycling Campaign, a cycling charity and lobbying body with over 13,000 registered members in London, more than 1400 living in Southwark alone and thousands more commuting through the borough daily. We have consulted our members widely both formally and informally, conducted site visits in conjunction with infrastructure experts, and gathered evidence from several sources.

This is a truly dismal proposal which worsens cycle safety and does hardly anything substantial for pedestrians. We are extremely disappointed that, although several forums, contacts and opportunities exist for us to be contacted on the general direction of this scheme prior to final presentation to the public, we heard nothing until the consultation was published. Had we been contacted earlier on we believe our input would have been useful and it is unacceptable that a key stakeholder (the properly-constituted membership body representing cyclists in Southwark) was not kept abreast of these plans' development.

Furthermore the timing of the consultation process and short duration of the consultation period raise serious questions about the council's continued commitment to engagement with us.

We ask Southwark Council to completely reconsider the place / movement functions of the Camberwell Green area, and its wider role in the transport network - for all modes. The council must completely revise their plans from scratch; and we have made some suggestions for viable alternatives to start with.

- The proposal does little for pedestrians
 - crossing times are hardly reduced, crossings are not convenient,
 - informal crossing will still occur (a symptom of tension between place and movement functions of this high street.)
- The proposal actively worsens conditions for cyclists
 - Bus lanes removed on Denmark Hill and additional turns allowed to Coldharbour Lane
 - Left hook dangers including the Orpheus St junction (already fatal this year) not addressed
 - No safe access to ASLs which are in any case a part time solution
 - No space for cycling
 - No attempt to address forecast and measured increases in cycle numbers through the junction, even though these are encouraged by the Southwark Cycling Strategy
- The proposal appears to prioritise motor traffic capacity. This is odd since TfL and Southwark figures (and national travel stats) show motor mode falling.
- The proposal does nothing to address the environment at Camberwell Green. What should be a pleasant town centre and retail hub is dominated by motor traffic (speeds/accelerations across the very large junction are aggressive) and will remain so under this proposal.
- Given the disruption the proposed work would cause anyway the Council must take this opportunity to reimagine the network more widely. Several alternatives have been considered which separately

or in combination could drastically improve the environment without significant impact on traffic capacity in the long term:

- a segregated junction,
 - an all-arms-green junction
 - a cycle bypass around the north and east of the Green itself, accessible from all directions
 - a bus hub in Orpheus St, freeing up bus stop space on Denmark Hill for walking and cycling
 - closing Daneville Rd to motor traffic at Coldharbour Lane (moving the car park entrance to Wren Rd), allowing a simplified/segregated T-junction at Coldharbour Lane and creating a wider pedestrian / retail space.
- There appears to have been no Cycling Level of Service (CLOS) analysis performed on this proposal. A first analysis by an expert group Southwark Cyclists convened indicates the current proposal would score extremely poorly.

3 Please provide your comments and feedback on the Camberwell New Road Plan

- Southwark Cyclists reject/oppose this proposal.
- This is a heavily used commuter route for cycles and other modes.
- No space for cycling whatsoever - a bus lane in one direction and nothing in the other.
- Either provide segregated space for cycling in both directions, or create a viable bidirectional cycle bypass in Medlar St.

4 Please provide your comments and feedback on the Camberwell Green Junction plan

- Southwark Cyclists reject/oppose this proposal.
- This is a shocking design that could have come from the 1980s.
- 'Lack of space' does not apply: There is a vast amount of physical space available at this junction and the council can and must do much better.
- Pedestrian crossings are still very long and crossing will be inconvenient and slow (at the crossings) or unsafe (at informal crossing points)
- The junction is huge, with broad radii that will encourage very fast speeds and aggressive acceleration across the junction (as now)
- Provision for cycles is essentially non-existent. This mode is not catered for at all by this design:
 - No safe access to ASLs
 - ASLs are part-time anyway
 - Narrowing of junction at Denmark Hill by buildouts, in conjunction with removal of bus lane, will create severe pinch points that pose an unacceptable risk to all cyclists, especially anyone other than confident young men.
 - Lethal left-hook hazards exist on every single arm of the junction. For a new proposal in 2015 this is completely unacceptable.
- **Given the accumulated evidence that this type of junction design is inherently unsafe in 2015, Southwark Council should consider that they may be open to legal proceedings for negligence when serious accidents / fatalities occur here if they fail to implement a safer design. We urgently request that a Cycling Level of Service matrix analysis (CLOS) be performed as set out in the TfL LCDS2. This should be published.**

5 Please provide your comments and feedback on the Camberwell Church Road plan

- Southwark Cyclists reject/oppose this proposal.
- This is a non-design. It provides tinkering only.
- Used by large and growing numbers of cycle commuters, this key route makes absolutely no concession to their safety.
- Also used by large volumes of heavy motor vehicles this road **must** have safe space for cycling or a safe, direct, and convenient alternative parallel route.
- Applying junction treatments and kerb build-outs when there is no cycle lane to take cycles safely past the constrictions is inherently unsafe - policy from the 1990s. It is also counter-intuitive as other parts of the proposal (raised tables, contraflow on Grove Lane) recognise cycle traffic needs to be catered for.

6 Please provide your comments and feedback on the Camberwell Road plan

- Southwark Cyclists reject/oppose this proposal.
- This is a heavily-used road so people need safe space for cycling. None is provided.
- The N and E sides of the Green could provide an appropriate bypass route for cycles/pedestrians only, *if* cycles are able to access this bypass safely and efficiently.
- Cycles will be unable to make use of the bus lanes safely at all as large numbers of busses entering / leaving them will block them, cut them up, or force them into the general traffic lane or pavement.

7 Please provide your comments and feedback on the Denmark Hill and Coldharbour Lane plan

- Southwark Cyclists reject/oppose this proposal.
- The left-hook into Orpheus St has already caused a fatality this year. The council proposal does absolutely nothing to address this.
- Removal of the southbound bus lane and opening a right turn into Coldharbour Lane actively worsen conditions for people on bikes at this extremely busy junction.
- Viable alternatives include:
 - moving several bus stops to Orpheus St. This would create a bus and retail hub in this currently under-used street only metres from the high street. Space on the high street (Denmark Hill) could then be reallocated to walking and cycling infrastructure.
 - Closing Daneville Rd to through motor traffic at the Denmark Hill end. This would allow the Coldharbour Lane junction to be simplified as a T-junction with segregated space for cycling and easier crossings for pedestrians (the Morrisons car park entrance could be moved to Wren St). This would also create a more pleasant retail / social / services environment on Daneville Road.

B. Pocket places

8 Please provide your comments and feedback on the Selborne Road plan

- Southwark Cyclists accept this element of the proposal.
- Why not cobble or pave the whole close?

9 Please provide your comments and feedback on the Wren Road plan

- Southwark Cyclists reject/oppose this proposal.
- It is virtually impossible for people on bikes to access Wren Road safely from the N or W as this requires turning right on C Ch St across four lanes of traffic.

10 Please provide your comments and feedback on the Artichoke Place/ Kimpton Road plan

- Southwark Cyclists accept this element of the proposal.

11 Please provide your comments and feedback on the Grove Lane Option 1 plan

- Southwark Cyclists reject/oppose this proposal.
- It is impossible for cycles to safely access Grove Lane from the N or W as they have to cross four lanes of traffic. This plan introduces a nice cycle lane but does nothing to address how cycles will actually *get* to it.
- The cycle lane makes no sense when there is space for a cycle track.

12 Please provide your comments and feedback on the Grove Lane Option 2 plan

- Southwark Cyclists reject/oppose this proposal.
- It is impossible for cycles to safely access Grove Lane from the N or W as they have to cross four lanes of traffic. This plan introduces a nice cycle track but does nothing to address how cycles will actually *get* to it.
- The cycle track is a good idea but will be of very limited use unless it's accessible.

13 Please provide your comments and feedback on the D'Eynsford Road plan

- Southwark Cyclists reject/oppose this proposal.
- Every possible combination has been proposed except anything providing for cycling.
- The 'shared space carriageway' option (3) in particular will turn this area into a rat-run.
- The council have found room for extra car parking and removal of the median strip but not a segregated cycle facility. This is at odds with falling car use/ownership in the borough *and* their stated aim of increasing cycle modal share.