

# Southwark Cyclists response to consultation on Southwark Spine (East Dulwich - Peckham)

December 2017

Southwark Cyclists welcomes this opportunity to respond to the first section of the Southwark Spine cycle route ('the Spine') being consulted upon. Our response is divided into three sections:

- Introductory issues, setting out the context and five suggestions for next steps;
- Route wide issues;
- Sheet by sheet analysis:
  - Sheet titles are graded using traffic light colours, those highlighted in red are showstoppers and those in amber have serious issues.
  - Measures are divided into those we support, those we oppose and additional ones needed.

We would particularly welcome further discussion on next steps and detailed design. We believe there is a strong case for a joint visit by councillors, officers, campaigners and local residents to learn from successful healthy streets schemes elsewhere in London, such as Walthamstow.

## Introductory issues

While very supportive of the principle of a high quality route on this alignment, Southwark Cyclists objects to the current proposals for the Spine, as:

- There would overall be few benefits but also some disadvantages introduced for a route that requires substantial improvement in conditions, not least tackling of rat-running, if more people are to feel safe cycling.
- The critical section through Bellenden gyratory would feel even less safe. Moreover the proposed cycle tracks would fail to cater for current peak cycle flows let alone any increase, while the layout would remain confusing to find your way round, particularly for cycling to Peckham Rye station from East Dulwich.
- The opportunity to deliver a better street environment and walking conditions, particularly in Bellenden village, through innovative design has been missed.

We are very disappointed that this scheme has proceeded to consultation, given the public support for removal of the gyratory in 2016 and the serious concerns fed back about this scheme then. If any good has come from this delay if not debacle, it is the demonstration there is no way to keep the gyratory while providing for safe, convenient (i.e. two-way) or indeed increasing levels of cycling.

## Cycling growth in Southwark

Data published by TfL in November 2017 suggests that cycling has grown by 15% in inner London in the last 12 months, with recently opened routes seeing as much as 60% growth in a year after opening. If a high quality Spine can be delivered, one would expect a similar

initial figure then continuing growth from 'network effects' as a safe cycle network takes shape. Southwark, having been disadvantaged by a lack of river crossings and limited coverage of cycle docking stations, may well see significantly higher growth in cycling than the inner London average when the Rotherhithe cycling bridge is delivered and dockless cycle hire normalises. Even without those factors, the Southwark target to double cycling between 2015 and 2025 now appears unambitious and likely to be overshoot even with limited further action by the borough.

To be an effective use of investment, the Spine should be designed to cope with potential cycling growth to at least 2030. According to Southwark traffic counts, peak cycle flows in summer 2017 exceeded 200 cycles per hour on Lyndhurst Way. If it is to be usable in peak hours to 2030, the Spine should be designed to cater for at least 300% increase in cycling from 2017 levels.

### Healthy streets

TfL published new guidance including its [Healthy Streets Check for Designers](#) during the consultation period. Despite the claims in the consultation materials, the scheme's impacts on TfL's draft Healthy Streets indicators appears at best limited and in some instances highly negative. Critical issues include:

- Lack of any access restrictions for motor traffic
- Side roads: poor conditions for walking and risk of cyclists being hooked
- Lack of capacity for cycling growth
- Cyclists pressured to weave in and out of parked vehicles and ride close to them
- Inability to overtake other cyclists on segregated sections
- Poor air quality, particularly at northern and southern ends of this route section.

In relation to TfL's Cycling Level of Service scoring, some of the issues include:

- The proposed cycle tracks would be just 1.5m when 2.2m is the minimum required if current cycle flows are to be segregated let alone any increase provided for
- heavy turning across cycles and confusing priority
- presence of guardrails
- peak hour motor traffic flows.

The London Assembly has this month stated its concern about schemes not complying with Healthy Streets principles and we recommend that an audit of the scheme is carried out urgently using the new guidance.

### Delivering the ambition in the Southwark Cycling Strategy

The critical policies in the 2015 Southwark Cycling Strategy are make cycling stress free and to make cycling appealing for all ages and all abilities. The key test is whether children would feel cycling to school on the route in the morning rush hour. Although Average Annual Daily Traffic traffic flows on streets may not appear high compared to elsewhere, the flows are concentrated during peak hours and much of the weekend, when drivers use the whole route to bypass congestion on neighbouring main roads. It is abundantly clear that children would

continue not to feel safe cycling on the route with the largely cosmetic changes proposed and concerns have been expressed by parents at local schools.

The proposals are in fact likely to widen health inequalities rather than reduce them: while signing the route may encourage more healthy, confident 30-somethings to cycle, it will not feel safe enough to encourage Southwark children, who already have some of the worst health indicators in the UK<sup>1</sup>.

The strategy aimed to make Southwark the best borough in London for cycling. Though there has been progress delivering secure cycle parking and Quietways, including good schemes at major junctions. the reality is that progressive boroughs like Waltham Forest, Hackney and Camden are widening their lead over Southwark because they have delivered exemplary area-wide schemes. Sat Navs are increasing rat running down residential streets and Southwark needs to tackle this through filtering out drivers. Otherwise these 'weakest links' will mean its cycle routes remain unappealing for a wider range of ages and abilities to cycle on.

### Prioritising spending

We appreciate that funding is limited, so have made suggestions to reduce both short-term as well as longer term maintenance costs, such as by reducing unnecessary way-finding markings and not paving raised junctions with modular units, which tend to fail quickly and look messy. Constructing and maintaining them can be very disruptive for traffic too. Bituminous surfaces can look attractive with coloured surfacing and make it easier to experiment with changes to markings and priority.

Focusing the budget on the Bellenden area is recommended as the gyratory is the biggest impediment to safe, convenient cycling. Opening up the streets to the south of Peckham Rye station to legible two-way cycle routes has the greatest potential for modal shift, putting this key station within easy cycling of the area east of Lordship Lane that is poorly served by public transport.

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<sup>1</sup> [Lack of exercise is a weighty problem](#) (South London News, November 2017)

## Next steps

Since the turn of the century, there have been numerous studies, consultations and schemes proposed to tackle traffic issues around Bellenden without actual delivery<sup>2</sup>, change is long overdue. We suggest the following steps:

### **1. Approve 2016 scheme to remove gyratory before its 30th anniversary in 2019**

With three fifths of people who expressed a view in the 2016 consultation supporting a return to two-way working<sup>3</sup>, it is time to move forward. It is wrong for opposition in one street to effectively hold the wider area hostage. There are options to mitigate and design out some of the potential negative impacts that should be explored.

### **2. Trial innovative streetscape designs for this section of the Spine**

An evolution in design is needed to move on from the cumbersome and increasingly outdated Southwark Streetscape Design Manual (SSDM), a barrier to innovation and cost-effective delivery.

### **3. Trial road weekend closures using temporary materials over the summer**

Closures to general motor traffic in summer weekends if not a whole week in August should be trialled for Bellenden Road and Choumert Grove (and Camberwell Grove if reopened) to give the community a feel of the benefits of transformed streets. See [Small change, big impact](#) (TfL, 2017) for how Lambeth used straw bales to trial a new road layout that has now been made permanent with a high quality public realm.

### **4. Apply for Living Neighbourhoods funding from TfL**

An ambitious wider plan for healthy streets across Peckham and Camberwell should be drawn up in conjunction with local communities. Given how strong the competition for funding is and the wasted spend on studies and schemes in this area over the last 15 years, Southwark will need to demonstrate its commitment to a different approach, if it is to have a chance of success. That is why we suggest trials and action rather than yet more studies.

### **5. Deliver whole Spine to Quietway standards before 2020**

For a flagship route that was first proposed in 2014, the pace of delivery has been inexcusably slow.

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<sup>2</sup> See this [history of the Bellenden Renewal Scheme](#)

<sup>3</sup> In the 2015 consultation, 55% were in favour of two-way working and 37% against, meaning 60% of those who expressed a preference were in favour. The one element that did not receive public support (52% against) was for asphaltting part of a park to provide a turning space on Bellenden Road. If a householder applied to do that to their front garden, they would be required to use permeable materials, so it is not surprising the public opposed this. Alternative design options must be explored..

## Route wide issues

### Calmer traffic, cleaner air, better streetscapes

The Spine’s proposed approach to traffic calming, markings and public realm is outdated if not unlawful. The focus on traffic calming at limited locations - rather than reducing motor traffic and smoothing speeds along the whole route - contravenes new public health guidance<sup>4</sup>. Southwark’s overreliance on heavy traffic calming rather than filtering cycle routes increases air pollution<sup>5</sup> through increased braking by drivers as well as exposure by the most vulnerable. This is likely to be a particular issue with the proposals near to Peckham Road and Lordship Lane where air quality exceeds legal limits.

There is much to learn from the Dutch ‘sober’ approach to traffic calming, which represents a different design philosophy. The Dutch filter streets and change perceptions through the idea of ‘self-explaining roads’. This involves both making their minor streets look and feel different to main roads as well as highlighting potential conflict points, such as pedestrian desire lines and junctions, by raising the carriageway. Humps are used as a last resort rather than default. Compared to gently raised tables, not only do humps encourage drivers to brake rather than just coast, they also cause problems for less conventional types of cycles, even if sinusoidal. By contrast to the Dutch approach Southwark treats its quietest and busiest roads with similar standards and markings, while placing humps at regular 100m intervals.

Table 1: minor junction differences

Issue	Dutch approach	Spine proposal
<b>Geometry</b>	Junctions narrowed so to be same width as width of carriageway between parking	Waiting restrictions means carriageway widens out at junction. Right turns become harder for cyclists
<b>Lining</b>	none	Heavily lined with give-way, central lines and yellow lines
<b>Priority</b>	Implicit to the right	T-junction
<b>Impact on driving style</b>	Creates street environment where drivers become used to coasting, and are prepared to negotiate regularly	Drivers with priority push through, frequently braking and accelerating, adding to stress and air pollution.

A new approach is needed on our residential streets involving:

- Removal of central line markings and clutter such as guardrails
- Narrowing and raising minor junctions, trialing new forms of priority with minimal markings such as ‘informal roundabouts’, as used successfully in the City of London

<sup>4</sup> [Air pollution: outdoor air quality and health](#) (NICE, 2017)

<sup>5</sup> Southwark relies on road humps, which can increase air pollution by as much as 100% according to City of London research, but can be ineffective against some vehicle types such as SUVs.

- Trialing measures to make carriageway appear narrower and assist cyclists to position themselves away from car doors. Either 1m coloured surface strips along parking or simply laying down a wide central strip with a 1m gap either side of where cars are parked.
- Regularly breaking up the 'metal wall' of rows of parked vehicles with planting and buildouts connecting to raised informal crossings or zebras.
- Particularly in locations with a place function, such as Bellenden village, applying patterns and art on carriageways, taking inspiration from Better Bankside's colourful crossings.
- Road humps, whether new or retaining existing ones when resurfacing, should be a last resort classified as a departure from standards that require authorisation from senior officers.

As an example, we propose removing the humps outside the Harris Academy Peckham and replacing it with a gently raised zebra crossing lined up close to the entrance. Not only better for youths walking to school it helps explain the desire line to drivers.

#### Route concept and wayfinding strategy

'The Spine' is not likely to be well understood by existing let alone new cyclists, not least as the CS and Q categorisation is still not well understood. Further thought should be given how route should be numbered to be comprehensible within the existing cycle network, such as by signing it as a Quietway for now, rather than a new type of route.

Well designed, wayfinding will be essential, to link to other cycle routes like Q83 and CS5 as well as key destinations like Peckham Rye station & North Cross Road shops. The usefulness of the direction signage for the Quietways has been poor, noticeably worse than previous generations of cycle routes, for example with a lack of destinations and other routes shown on signage.

Not least given how straight the route is, the consultation proposals for very regular cycle logos seem excessive and the green surfacing is unlikely to wear well so should be omitted. Signs and markings are only appropriate where there is a turn or on long stretches where there are major junctions or other destinations, e.g. junction with North Cross Road.

NB The proposed 'Spine' is not permitted on direction signs and road markings: although TSRGD 2016 permits letters, it requires a number to be present.

#### Car parking

Some concerns expressed about the Spine relate to impacts on car parking. The decision to install yellow lines around all junctions in Southwark has already been taken, however. The consultation should have been clearer about which parking spaces are already planned to be removed, once this policy had been fully implemented. There is a strong case for infill Controlled Parking Zones (CPZ) around the Spine, particularly north of East Dulwich Road, to manage parking pressures and encourage a shift to cycling, in accordance with Healthy

Streets principles. Gradual reduction of car parking will be necessary to comply with traffic reduction policies in the Mayor's Transport Strategy.

## Permeability

While neighbouring authorities such as the City and Lambeth have been systematically opening their one-way streets for two-way cycling, Southwark has no such programme. These proposals would even make introducing two-way cycling harder, such as by extending the pavement on Choumert Road. This is unacceptable. There should be a presumption of two-way cycling on all streets leading to and from the Spine, such as McDermott Road, Choumert Road and Blenheim Grove. This could be implemented through one multi-street traffic order.

## Sheet by sheet comments

### Sheet 1 Lyndhurst Way

*Little improvement for busy road past school or for junction highlighted as in [top 10 of most dangerous UK junctions for cycling](#)*

Support: resurfacing

Oppose: sinusoidal humps: do not provide safe crossing for those on foot and would increase already illegal levels of air pollution

Additional:

- Install cycle pre-signal (TfL scheme)
- convert single yellow lines to double
- add lead-in lane on southern arm to bypass queues: as most drivers turn left, this would be safer on offside, requiring removal of pedestrian island at the junction
- raise Grummant Road junction onto table with adjacent zebra crossing to school entrance to provide safe route to school
- remove 3 parking spaces and relocate 2 (so reducing by 1) to Grummant Road
- remove pedestrian refuge & central line markings

### Sheet 2 Melon Road

*Success depends on TfL improvements for crossing Peckham High Street*

Support:

- upgrade to double yellow lines
- install of raised tables, though should not be paved
- Install yellow box
- enabling right turn for cycles

Oppose:

- overdoing the cycle logos - gesture engineering

Additional:

- signalise Melon Road exit to same phase as pedestrian phase (enabling cycles to advance to ASL box safely)
- consider northbound lead-in lane for ASL so long as cycle pre-signal installed.

### Sheet 3 Bellenden Gyratory North

*Little improvement for busy road past school, unsafe proposed junction and facilities*

Support:

- resurfacing
- new speed tables, so long as not paved
- Highshore Road cycle gap enlargement (unclear if this has been included in the final consultation proposals though)
- turning Elm Grove junction into t-junction
- upgrading to double yellow lines

Oppose:

- sinusoidal hump by Lyndhurst Square, instead install long raised table, or similar traffic calming element that emphasises feature of the square
- Bellenden Road cycle route needing to give way
- Current design of Bellenden cycle contraflow, which would not be safe, particularly at southern end where lane disappears at spot where drivers come round corner on wrong side. In addition the proposed 1.5m minimum width would squeeze cyclists into the kerb and prevent them taking an assertive position. Only removing the gyratory would deliver a safe solution here.
- Marking of central lines on Lyndhurst Way. Also prefer marking of buffer strip outside parking bays rather than cycle logos, which look too close to parking.

Additional:

- Consider protected mandatory cycle lanes on Lyndhurst Way down to Highshore Road. This would require parking removal. These may not be needed after an area wide filtering.
- Put Bellenden / Highshore Road junction onto raised table. Either give priority to north south movements (predominantly cycles), so as to minimise stopping chance. Alternatively consider marking as informal roundabout so all have to give way (see LCDS).
- Remove parking so that cyclists do not need to weave in and out of parked vehicles. Remove parking bays between sheets 2 & 3, relocate a couple to Lyndhurst Square and remove very lightly used pay parking by sports ground
- Consider making Highshore Road a false one-way to discourage drivers cutting corner into it.

### Sheet 4 Bellenden Gyratory South

*These ill-considered proposals introduce 'critical fails' for cycling, in terms of safety and adequate width, while maintaining an illegible road layout. Not only would this be an inefficient use of space for cycling, deliveries would block the whole road for other road users.*

By repeatedly segregating then merging, cycle traffic with motor vehicles, the proposals multiply potential conflict and collisions significantly. The current layout at least enables cyclists to generally 'hold the lane'. The confusing arrangements proposed for priority at



junctions, particularly at Bellenden/ Holly Grove would open Southwark up to civil claims for negligence in case of collisions.

The width proposed segregated facilities does not meet minimum LCDS standards: rather than 1.5m they would need to be 2.2m to cope with current cycle flows let alone any increase. In addition separation to parked vehicles should be 1m, here it would be as little as 0.5m. If a passenger opened a door without looking, there could be literally nowhere for cyclists to escape. The sharp corner radii are likely to breach LCDS standards too.

### Junction problems

Bellenden/Chadwick: southbound cyclists exiting segregated lane need to quickly take primary position before kerb juts out

Chadwick/Lyndhurst: drivers likely to take corner wide (avoiding new buildout) and go into unenforceable cycle lane. Forcing cyclists to make slower movement on outside of bend likely to increase risk of being cut up, for example being placed too close to Chadwick Road give way lines.

Lyndhurst/ Holly: difficult for cyclists turning right to exit lane and position correctly

Holly/ Bellenden: this is truly awful, as cyclists going from Holly to Bellenden will need to turn right from segregated lane without being able to see what drivers behind them are doing.

Southbound cyclists proceeding along Bellenden will find the contraflow lane ends just where risk of being hit by oncoming drivers is greatest.

Blenheim Grove

### Support:

- raising junctions onto tables
- additional zebras and crossing points
- parking relocation to Holly Grove
- replacement of speed humps by raised crossing (though unsure about best location)

### Oppose:

- segregated cycle lanes: far too narrow and forces people cycling into wrong position to proceed safely through gyratory junctions. Holly Grove junctions particularly bad design that merge cyclists turning right with drivers turning left/going straight.
- buildouts and junction geometry that would entrench the one-way system
- unsafe cycle contraflow arrangement (see sheet 4 comments)
- any buildout on Chadwick Road that would hinder introduction of contraflow cycling

### Additional:

- return to two-way working and close Holly Grove, both as in 2015 scheme
- speed table at junction with Blenheim Grove - drivers often cut up cyclists and pedestrians here
- contraflow cycling on Blenheim Grove to improve access to station

## Sheet 5 Maxted Road

*Real failure to respond to place function through the design to reduce traffic dominance. The lack of traffic calming and chicane arrangement is likely to degrade cycling and walking conditions.*

Support:

- upgrade to double yellow lines & reduction of 3 car parking spaces
- build out on Choumert Road (west) only for cycle stands
- installing zebra on Maxted Road but buildout should be on school side where pavement is narrower
- reduction in car parking

Oppose:

- chicane concept, which would force cyclists close to car doors
- widening Choumert Road (east side) footway, unless designed to enable introduction of contraflow cycling

Additional:

- Filter traffic, at least 7-10am & 4-7pm, preferably 7-7 on Bellenden just by Choumert Road junction: best place is just north, enabling filter to be completed by filtering Choumert Grove by car park, retaining access from south.
- Raised tables on Bellenden at Maxted Road & Choumert Road junctions, to reduce traffic dominance and speed while promoting a sense of place. Consider adding circular feature to increase priority of cycle route and require all to give way.
- Colourful surface treatment along Bellenden Road around shopping area: cost-effective way to create sense of place.
- Ensure guardrail removed - critical requirement for Cycling Level of Service
- Provide big increase in cycle parking: already see 15 cycles parked at weekends, suggest provide for 40+ along street.
- Narrow junction of Oglander / Maxted Road and change priority or introduce circular feature to facilitate movement along spine: right turn is not easy here.
- Contraflow cycling on Choumert Road + cycle contraflow lane on McDermott Road to link to filtered route via Sternhall Lane.

## Sheet 6 Adys Road North

*Rat-run feel, increasing size of junctions may increase speed issues*

Support:

- raised table, so long as not paved
- Reduced parking, so long as junctions narrowed rather than effectively made wider

Oppose:

Additional:

- Narrow junctions, particularly out on north side of raised table on Oglander Road to ensure consistent width with parked cars
- Introduce Controlled Parking Zone (CPZ)

### Sheet 7 Adys Road South

*Rat-run feel and unpleasant junction: difficult, particularly in rush hour to pass queuing traffic to reach ASL*

Support:

- Principle of parking reduction (but proposed in wrong place)

Oppose:

Additional:

- move raised table to link with pavement on north side of East Dulwich Road (north of Goose Green) / path to playground, so it is on desire line and on bend in road
- extend no waiting either side of traffic signals so as to allow installation of longer and wider lead-in lanes to ASLs
- Introduce cycle pre-signals but only worth doing if longer lead-in lanes
- Introduce CPZ

### Sheet 8 Crystal Palace Road North

*Unsure about rationale for parking reduction: could unintentionally increase speeds on this straight section with few side roads*

Support:

- removal of islands

Oppose:

Additional:

- Consider psychological traffic calming measures
- Consider filtering motor traffic at least during rush hour in this area

### Sheet 9 Crystal Palace Road

*Additional measures needed to make this feel more of a cycle street and improve North Cross Road junction*

Support:

- Removal of islands

Oppose:

Additional:

- raise table and narrow junction with North Cross Road

### Sheet 10 Crystal Palace Road South

Support:

- junction table, so long as not paved
- reduced parking

Oppose:

Additional:

- Buildouts to narrow junctions, particularly those that are cross roads

### Sheet 11 Goodrich South

*Greater priority needed where route turns*

Support:

- Junction table but it should not be paved
- Reduction in parking

Oppose:

- Sinusoidal hump (see sheet 12)

Additional:

- Install junction table and buildouts to narrow Landells / Goodrich Road junction
- Likewise narrow Crystal Palace Road junction with buildouts
- Introduce circular feature / informal roundabout at both these junctions to increase priority for cyclists using the route over drivers.

### Sheet 12 Landells Road

*Route ends abruptly at dangerous junction without linking to wider cycle network*

Support:

Oppose:

- Sinusoidal humps

Additional:

- Install raised entry treatment and at least one raised table lined up with a tree: traffic calming that is better for cycling, walking and air quality
- Segregated bidirectional track to provide safe access to Eynella Road ( rather than just dumping people on busy Lordship Lane