



27th October 2017  
consultations@tfl.gov.uk

Dear Sir or Madam

### **Response to TfL Consultation on Cycle Superhighway 9**

The Bedford Park Society (BPS) represents the area known as Bedford Park, including the Conservation Areas designated by the London Boroughs of Ealing and Hounslow and the adjacent roads, which include the area bounded by Abinger Road in the East and St Alban's Avenue in the west, Whellock/Speldhurst Roads and South Parade/Bath Road, plus Roman Road, Lonsdale Road, Gainsborough Road and Flanders Road. Bedford Park is close to Chiswick High Road. We have 540 members.

Whilst we welcome measures which encourage healthy living, including more walking and cycling within Chiswick, we are not convinced that the proposed cycle superhighway is the right solution. On behalf of the Society's members **we therefore write to oppose this proposal.**

We do not consider that the case for CS9 has been made, especially if the needs of pedestrians and local residents are taken into account, and believe that the cycle superhighway will have a detrimental effect on the amenity of the area.

This view is supported by a survey of our members which indicated that 74% are against the proposal, 21% are in favour, and 5% expressed no view.

Our members expressed concerns about the likely effect on both Chiswick High Road and on the Bedford Park Area, specifically:

- the safety of pedestrians around Chiswick, especially trying to cross Chiswick High Road and the superhighway
- the effect of the proposed superhighway on local civic and business life, especially on Chiswick's much prized local cafe culture and resulting sense of community.
- the likely level of traffic displacement into the residential streets of Bedford Park
- higher levels of pollution from increased traffic congestion along Chiswick High Road

Many members suggested that the wide pavement along the A4 would be a more appropriate route for a cycle superhighway for the mass movement of commuters into and out of central London, with local measures to promote cycling within Chiswick, combined with improvements in public transport to promote switches from cars to others modes of travel. We support this view.

Our detailed comments and observations are set out below.

#### **Safety**

- We are concerned about the inherent risk of mixing pedestrians with cyclists where there is a continual need for provision for junctions and for pedestrians to be able to cross the superhighway. It is not evident that a study has been done to assess this.
- Safety will be compromised by the positioning of the two-way cycle lane on the southern pavement in Chiswick High Road, which would have to be negotiated by people to cross the road or to wait for a bus. It will make negotiating the south side of Chiswick High Road very difficult and risky for pedestrians, and the two-way CS9 will potentially be dangerous for cyclists, especially if they are cycling at high speed.
- These risks are removed when cyclists use the road space. Has consideration been given for the superhighway to use the current road space with narrower pavements to allow safe space for cyclists?

### **Visual Impact and character of the Chiswick neighbourhood**

- The “village” atmosphere and café society of Chiswick High Road would be irreparably damaged by the introduction of the cycle highway to the detriment of residents and local businesses alike
- The amount of street furniture required, new lights, signs, kerbs and cross overs etc, will be unsightly and detract from the visual appeal of the area. The removal of trees, which would likely be of a higher volume than estimated, would also detrimentally affect the character of the area.
- We note that it is not clear that the proposed scheme meets the London Cycling Design Standards produced by TfL. These reject the use of this type of CSH in a place like Chiswick High Road. The standards state that a CSH going down one side of the road should be used very selectively, i.e. where there are no buildings on that side and no kerb side activity, or on arterial roads such as the A4 or in one-way systems. The standards expressly state that “it is not desirable to take space from pedestrians”

### **Economic Impact**

- The superhighway would run through the area on the south side of Chiswick High Road where there are numerous commercial premises. It is not evident that the effect of this proposal on footfall and the estimated economic impact on shops and businesses along Chiswick High Road has been assessed.
- More difficulty with vehicular access will discourage people from visiting shops and accessing commercial premises and will make deliveries more difficult.
- Other premises are affected in different ways, such as the Catholic Church on the junction with Dukes Avenue. This will impact the congregation of the church and how special services are managed.
- Additionally, there will be significant disruption during the building period of CS9 if it goes ahead, discouraging visitors to Chiswick over a prolonged period.

## **Congestion**

- The loss of road space, bus lanes and the need for bus gates (Goldhawk Rd) will, inevitably, slow traffic down and increase congestion in Chiswick High Road. The consequence will be traffic displaced onto nearby roads, for example Dukes Avenue (access to A4), South Parade and Bath Road. In turn this will displace traffic using these roads onto residential roads in Bedford Park. This happens currently when there is any disruption on Chiswick High Road or the A4, and will be exacerbated by the effect of CS9. TfL have confirmed to us that they have not completed this modeling, which is concerning.
- The traffic modeling for the main routes indicates, for example, that journey times going east from Chiswick Roundabout to the Goldhawk Road will increase at peak from 12 to 14 minutes to 16 to 18 minutes. As a minimum, more stationary traffic on longer journey times equates to poorer air quality. Even if poorer air quality is tackled through cleaner vehicles, electric and hybrid vehicles still take up road space and cause congestion.
- Additionally, for those familiar with the area, the times shown for peak time travel on this section of the route are not credible for the average journey.
- Buses will be slower and fewer bus lanes will mean more hold-ups for other traffic, for example, the westbound lane from Goldhawk Road to Chiswick Lane, and more 'rat' running.
- Much work has been done over the years to obtain bus stops in the right places, loading bays, P&D bays, 24-hour bus lane sections and a bus priority 'gate' on the approach in Chiswick High Road to Chiswick Lane. All were necessary and continue to be so. The removal of some of these for CS9 and the conversion of single yellow lines to double ones will have a negative effect on businesses, bus journey times, congestion, air pollution and pedestrian safety. Our public realm would be harmed.

## **Traffic Numbers and Vehicles/Removed or Substituted**

- It is stated that there are around 3,000 cycling (?) trips per day in the 'area' but there is no detail as to whether these are local trips or commuters cycling a reasonable distance to work. There does not appear to be any evidence that the superhighway will benefit local residents making cross area journeys, or reduce traffic on the east/west axis. These latter journeys are a small fraction of those undertaken daily on the buses, tube, car and walking.
- TfL has not provided a projection of the number of cyclists likely to use the route by 2021 who are not on local journeys.
- The viability of the proposed scheme is based on an assumption that if cycling is made safer, many people will switch to cycling. No doubt some would, but many are not able to (e.g. the very young, the elderly, those transporting goods) and not in all circumstances (e.g. in wet or windy weather, or local



residents leaving Chiswick for long distance journeys which are not feasible by public transport)

### **Some Alternatives**

- There is broad acceptance that motor vehicles are a threat to cyclists where road conditions are unfavourable. Many respondents to the BPS survey were supportive of improved provision for cyclists but did not believe that the CS9 proposal was the right solution. Around 42 % suggested, unprompted, that alternative schemes, using the A4 and better local provision for cyclists, would be preferable if the cycle numbers justify a dedicated cycle track (although no evidence is given) it would seem much better, simpler, and probably more economic to route it along the A4. There are wide pavements, not used a great deal by pedestrians, and fewer junctions.
- In order to facilitate more local cycling, adjustments to the layout and traffic lights of key junctions will bring more immediate and cost effective benefits. Two examples are the junctions at Chiswick Lane and Goldhawk Road with Chiswick High Road.
- Other measures which could encourage car drivers to switch to public transport include stopping the Piccadilly Line at Turnham Green increasing capacity at Gunnersbury Station and completing the pedestrian bridge to Chiswick Park station. We consider that these actions will meet the needs of the population of this part of west London in a more effective manner.

Yours faithfully

Helen Jameson, Chair  
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