



LIP Consultation  
Transport Strategy  
London Borough of Ealing  
Perceval House  
14/16 Uxbridge Road  
London W5 2SG

10 November 2005

**Re: Transport Local Implementation Plan consultation**

Dear Sir,

I write on behalf of Ealing Cycling Campaign with our comments on Ealing's draft transport LIP.

Overall, we welcome the general flavour of the LIP which confirms the council's enlightened attitude towards cycling. We do have a number of detailed comments as set out below, but these should not be taken as detracting from our overall support of the LIP.

In making our comments, reference is made to a number of detailed examples. This is not because the examples given are prime targets for inclusion in the LIP, which we well appreciate is a strategic document for the whole borough. They are simply there to illustrate particular points.

Throughout our comments we are mindful of the requirement set down in the London Cycling Design Standards (LCDS) that cycling will be encouraged by providing cyclists with routes that are **FAST, SAFE and COMFORTABLE**.

**5.7.11 Speed Humps**

**We endorse the comment that from a cyclist's perspective the speed cushion is preferred to the speed hump**, because cushions do not cause the cyclist to lose momentum. If humps are used they need to have a sinusoidal profile (see LCDS 3.5.4) but the council's contractors rarely seem able to achieve a satisfactory result. For longer rat runs, technology based solutions are preferred for the reasons given at LCDS 3.3.8. We were therefore encouraged to see the comments made at 5.7.12 and 5.7.13, and would urge the council to consider traffic calming methods that do not cause cyclists to lose momentum.

It is noted in 5.7.11 that while speed cushions are effective in reducing car speeds to 20mph, they are less effective for large vehicles. **We would like to see a policy commitment to replace all humps with cushions on all roads that do not carry significant numbers of large vehicles, and where alternatives to vertical deflection are inappropriate.** If this change is made at the next re-surfacing of the road in question, this improvement for cyclists can be made at zero cost.

**5.7.12 Alternatives to vertical deflection**

**We suggest that in residential streets with frequent junctions, mini-roundabouts be considered for traffic calming.** They force all vehicles to slow down as they approach each stop line, but without actually having to stop if there is no opposing traffic. An example can be seen on Windsor Road, W5, where the junction with Grange Road has a mini roundabout that performs a useful traffic calming function. Immediately to the north, Windsor Road traffic has priority over The Grove, and forces all

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east-west cycle traffic on The Grove (a signed cycle route) to stop. A mini-roundabout would be better here - the present priority dates back to an era when car park traffic to and from Ealing Broadway Centre was considered more important than through cycle traffic on The Grove. Similar situations exist throughout the borough.

### 8.3.1 Ealing Broadway Station

We note the comment that only 50 cycles are typically parked at Ealing Broadway Station at any one time. **We believe that there is a high level of suppressed demand for cycle parking at Ealing Broadway Station**, because of the perceived and actual level of theft and the lack of covered facilities. Last week our monthly meeting was attended by the local Police Crime Prevention Officer who confirmed this station as a cycle theft hotspot. A single CCTV camera is not effective – one person can stand with their back to the camera whilst blocking the view of their accomplice who is using the bolt cutters (so the police officer explained).

The reconstruction of Ealing Broadway station for Crossrail, or the much-needed re-vamp of the station if Crossrail does not proceed, should incorporate a secure all-day cycle parking facility. Comparable stations in Europe have several hundred or more secure spaces with an attendant, as shown in the example on the right (manned station cycle park at Freiburg). Once this is provided, the 100 spaces referred to at Table 2 on page 132 of the LIP are unlikely to prove sufficient. Provision needs to be made for expansion of the facility as numbers build up.



**A further issue is the need for provision to take cycles down to platform level.** ECC recognise that it is not always practical to take unfolded cycles on trains in peak hours, but at off-peak times and for weekend journeys the ability to take cycles on trains is essential. A similar requirement exists for users of wheeled luggage and pushchairs, who might reasonably be described as “able bodied people who temporarily have impaired mobility”. A recent Swiss design of combined cycle and suitcase ramp (see photo on right, Interlaken) is a simple low-cost solution that works well where the width permits, as for example on the steps down to platform 4 at Ealing Broadway station.



### 12.1 Cycling levels in Ealing

This paragraph states that levels of cycling in Ealing have not increased over the last three years. In the light of anecdotal observations from our members who cycle regularly around the borough, this is a very surprising statement. We note that later in this cycling chapter (section 12.15) it is mentioned that cycle counts are taken on the Uxbridge Road, and of parked cycles at 9 locations. **We think that a larger data set is required before any firm conclusions can be drawn**, with flow counts based not just on the Uxbridge Road which is an unattractive route especially for less experienced cyclists. Given that TfL are currently quoting a 100% increase in cycling over the last 5 years, it would be surprising if Ealing were so much out of line with other parts of London.

#### 12.6.1 New local cycle maps

We will be interested to see what is proposed for these, in due course. It will be sensible for any such maps to be based on geographical areas rather than borough boundaries. The Ealing Cycle Map (and

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indeed the cycle maps of most other London Boroughs) that were produced prior to the London Cycle Maps pioneered in 1999 by LB Ealing/LB Hillingdon (with Glaxo funding) suffered from the omission of mapping beyond the borough boundary. The same problem has occurred with the outer sheets of TfL's re-formatted map series, which omit adjacent areas just outside the TfL area.

There are great advantages in promoting a single consistent format everywhere with which the public will become increasingly familiar, based on the Ordnance Survey and A-Z mapping series. We would be keen that the London-wide mapping produced by TfL continues as the primary cycle mapping for London, as this ignores borough boundaries within London and hence avoids inconsistencies at borough boundaries. **One-off cycle map formats need very special justification** as they can deflect funds and scarce planning resources away from other cycle-specific needs.

**We suggest that a good starting point for any larger scale cycling maps produced for Ealing would be a format similar to the Central London map that appears on the reverse of all TfL's 19-sheet series of maps.**

### **12.14 The Funding Balance**

The draft LIP suggests that there is an imbalance between investment in LCN+ routes and other cycle routes, citing the Uxbridge Road as a case where significant investment has not increased cycle use. We suggest that the latter is not a representative case, but is probably the result of the unsatisfactory design of parts of the Uxbridge Road cycling route. At off-peak times there are legally parked or loading vehicles obstructing the cycle lanes, rendering the lanes ineffective and sending a negative message to cyclists<sup>1</sup>. The bus lane sections are better, but there are sections where there is insufficient width for a bus to overtake a cyclist whilst still leaving room for 2-way car traffic. As noted at 19.13.2 of the draft LIP, the accident rate for cyclists is high in Uxbridge Road, and it is likely to be shunned by cyclists who can find an alternative route. A new or inexperienced cyclist will be put off the whole route if even only a short section is perceived as too difficult.

**We believe that it is important that the LCN+ routes are completed to a high standard, to demonstrate what can be done and to set a yardstick against which other routes can be judged.**

On the basis of the 2001 journey to work figures quoted in section 2.3.2 of the draft LIP, a simplistic view would be that it is reasonable to spend £1 on cycling facilities for every £5 spent on bus facilities (including subsidies to bus services). On this basis we suspect that the London-wide funding balance is still loaded against cycling, albeit that the balance is improving. The problem is not too much expenditure on LCN+ routes but too little expenditure on cycling generally, as compared with less sustainable motorised transport modes that use non-renewable resources.

### **Page 145 Map of LCN+ cycle routes**

**Before the LIP is finalised, this map will need updating to reflect the progress of the LCN+ studies currently underway.** In particular, for route LCN+ 86 link 48 we understand that the following changes are likely to occur:

- The route across Pitshanger Park is under review, with possible relocation to the west;
- The crossing point over Uxbridge Road is likely to be moved further east, away from Drayton Green Road;

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<sup>1</sup> One possible approach to improving the Uxbridge Road situation is included in LCDS at 4.2.25 to 4.2.27, which suggests the use of time-limited mandatory cycle lanes.

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- The links to Hounslow southwards from Church Lane to Brentford and Kew Bridge were the subject of a joint LBE/LBH/TfL meeting on 24 October, a note of which is attached.

### ***Page 146 Map of existing and proposed cycle routes***

It is important that routes marked as “existing” are audited against the London Cycling Design Standards, so that any design faults can be rectified as soon as funding permits. **We suggest that a programme of audits of existing routes be established.** ECC would be happy to assist the council in prioritising such audits.

### ***The need for maintenance***

This leads to our final point on Chapter 12, that **there needs to be specific mention in the LIP of the requirement for regular maintenance of cycle routes**, with a specified maximum interval between site inspections. Key pointers are set out at LCDS section 7.11. Unless riding surfaces are kept in good repair (with a riding quality at least as good as that of the nearest alternative trafficked route), vegetation is trimmed, pot-holes are filled, graffiti is quickly removed etc, the benefit of the route to cyclists will rapidly reduce. **The commitment to regular maintenance of cycle routes needs to be carried through to chapter 17 of the LIP.**

### ***19.12 Monitoring of cycling on Uxbridge Road***

See comments under 12.1 above. Single-day counts are not good for monitoring cycling trends, as they can be influenced significantly by weather, as suggested by the difference between the two counts in November 2004 on the chart at 19.12.1.

### ***Strategic environmental assessment of draft LIP – pages 7 and 8***

We note that the possibility of increasing off-road cycle routes has been rejected, because of the adverse effects on landtake and habitats. Whilst we well understand the underlying sentiments here, we think there are a number of cases where this policy needs modifying. Where a cycle route crosses or abuts an open space, particularly a major open space such as a park or common, the environmental effect of widening a path to the recommended width of 3.0m (minimum 2.0m – LCDS 4.5.8) is small compared with the wider environmental benefits of encouraging cycling and enabling more people to enjoy the green environment in a non-polluting way.

Some examples of this are as follows:

- On Ealing Common, an on-carriageway cycle lane is currently being installed along the North Circular Road. If instead the footway had been widened to allow shared use with cyclists, the effect on the overall ambience of the common would have been negligible. There is in fact a cul-de-sac road across the common that could be narrowed to 3.0m so that the overall area of green space would increase.
- Across Pitshanger Park (LCN+ route 86) the shared path is undesirably narrow. Over the years the vegetation behind the fences has continued to grow, and in due course the fences will need maintenance and replacement. If the path were widened to 3.0m (either on the currently signed cycle route or on the alternative route being contemplated further west) the overall environmental damage would be very small compared with the wider benefits.

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- The shared route through the Ealing and Old Brentford cemetery could similarly be widened. This route is much used by pushchair users as well as cyclists.

An aspirational standard for these routes is illustrated at LCDS 4.4.44.

Accordingly, we suggest that **there should be a presumption in favour of widening paths to 3.0m where these form part of the borough's cycle network**, and where the local environmental damage is only marginal in the overall context.



All the above comments are summarised on the next page.

Finally, we would reiterate our overall support for the draft LIP which we see as a well-considered document.

Yours faithfully,

P L B Mynors CEng FICE FIHT TPS  
Council Liaison Member  
Ealing Cycling Campaign

cc David Lomas, ECC Borough Co-ordinator  
Tom Hartwell, ECC Secretary

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## **Summary of comments on draft Transport LIP, November 2005**

1. Cycle routes should recognise the LCDS criteria of being FAST, SAFE and COMFORTABLE.
2. ECC would like to see a policy commitment to replacing all humps with cushions on all roads that do not carry significant numbers of large vehicles, and where alternatives to vertical deflection are inappropriate.
3. In residential streets with frequent junctions, mini-roundabouts should be considered for traffic calming.
4. There is a high level of suppressed demand for cycle parking at Ealing Broadway Station. The reconstruction of Ealing Broadway station for Crossrail, or the much-needed re-vamp of the station if Crossrail does not proceed, should incorporate a secure all-day cycle parking facility with at least 100 spaces initially and provision for further expansion.
5. At rail stations, provision should be made for taking cycles down to platform level.
6. Before any conclusions can be drawn on levels of cycle use in Ealing, a larger survey data set is required than is currently used.
7. Any one-off cycle map formats will need very special justification as they can deflect funds and scarce planning resources away from other cycle-specific needs.
8. It is important that the proposed LCN+ routes within the borough are completed to a high standard, to demonstrate what can be done and to set a yardstick against which other routes can be judged.
9. Before the LIP is finalised, the map of LCN+ routes will need updating to reflect the progress of the LCN+ studies currently underway.
10. A programme of audits of existing cycle routes needs to be established.
11. There needs to be specific mention in the LIP of the requirement for regular maintenance of cycle routes, and a maximum interval between inspections established.
12. There should be a presumption in favour of widening off-road paths to 3.0m where these form part of the borough's cycle network.

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