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Wilsons:

Transport for London
By Email only

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29th March 2015

Our ref: MH/2470-74

Your ref:

Dear Sirs

Response to Cycle Superhighway Route 1 Consultation

Background

1. We are a significant business in Haringey employing 90 people. We were established in 1989. We provide legal services and our business is client based.
2. As well as our direct employees we attract a high volume of clients to the area. Our reception has around 300 visitors a week.

Cycling at Wilsons

3. Of our direct employees around 20 regularly cycle to work. In other words around 22% of our staff cycle to work. That is a very high proportion and far in excess of the general picture in London. We note that TFL states around 2% of journeys in the capital are by bicycle.
4. We actively encourage and support cycling in the following ways:
 - a. We have put cycling at the heart of our transport strategy.
 - b. Since 2005 we have operated the bike to work scheme. Around 35 employees, past and present, have been able to purchase bikes very economically under the scheme.
 - c. We expressly include safety equipment and suitable clothing in the bike to work scheme.
 - d. Installation of 3 showers.
 - e. Overcoming innumerable planning and bureaucratic objections to achieve the installation of a *secure* bicycle shelter on our forecourt in June 2011. The

shelter can accommodate a maximum of 13 bikes and we have a pressing need for another shelter of similar size.

- f. Availability of fixed Sheffield stands on the forecourt to accommodate overflow bicycle parking needs
 - g. Providing staff with a free on-site bike maintenance service. This was introduced in 2010. The service is currently provided on a bimonthly basis by Mobeone (see www.mobeone.org), which is a fantastic local business based in Haringey.
 - h. Promoting the availability of free cycling lessons.
 - i. Providing cycling maintenance equipment free of charge in the office including 2 hydraulic pumps.
5. We find that our cycling levels hold up very well throughout the year. Cycling has become embedded in the culture of the firm and in the lifestyles of individual staff members. The benefits of cycling appear to outweigh adverse weather conditions and we find that cycling numbers are far less subject to seasonal variations than they were, say, 10 years ago.
 6. Some of our visitors cycle to appointments. We believe there is potential to grow those numbers.

Popularity of cycling at Wilsons

7. As can be seen from the above cycling has become a very popular mode of transport in our firm. Staff who cycle identify the following particular benefits:
 - a. Arriving at work feeling refreshed
 - b. Having some physical exercise at the end of the day to relieve work stress
 - c. Saving money on transport costs (often up to £100 a month)
 - d. Feeling healthier
 - e. Losing weight
 - f. Quicker than public transport
 - g. Being able to reliably plan journey times
 - h. Long term health benefits.

Cycle superhighway Route 1

8. We are located at the very north of the Cycle Superhighway 1. We are on Tottenham High Road and the closest side road to our office is Ruskin Road.
9. We are about 150 meters south of the proposed start/end point of the Superhighway which is planned to start at the Church Road /High Road junction.

General observations

10. We are dismayed that *at the very start* of the proposed route sections 19 -16 immediately deviate away from the High Road. The route follows a circuitous, meandering backstreet route to Seven Sisters.
11. We do not see how sections 19 – 16 can possibly be described as a *superhighway*. We are extremely doubtful as to whether cycling commuters will leave the main road and follow this very significant deviation.

12. We urge you to think again and introduce a segregated cycle lane following the main high road down to section 15 of the new route.
13. Tottenham is experiencing a degree of redevelopment. Construction of the Tottenham football club stadium is now proceeding. The new stadium is also located at the very start of this superhighway. The capacity will be 61,000 (a massive increase on the current 36,000 capacity). There is enormous potential to bring thousands of football fans by bicycle to home matches. But you need to provide the infrastructure – the safe routes and the parking facilities.
14. It seems to us that there is a distinct lack of joined up thinking with the planning of sections 19 - 16. In our view there is ample road space available running along the High Road between the start at Church Road and Seven Sisters tube station.
15. The High Road between Philip Lane and Tottenham Green is 5 lanes of traffic. From Tottenham Green to the junction with Broad Lane the High Road becomes an incredible 6 lanes of traffic (3 lanes each way). There is an abundance of room to create a segregated safe, direct cycle lane.
16. The redevelopment of the Tottenham gyratory system and the reversal of the previous one way or arrangement is another startling example of costly road works that completely failed to accommodate cycling needs. The current structure is totally unacceptable for cycling.

Specific comments

Section 19

17. This is essentially a quiet backroad, which is already significantly restricted to *through* traffic. There are 2 schools on this section of the route, namely Lancastrian Primary School and Frances de Sales Catholic Infant and Juniors School. There is sadly a very significant volume of cars coming into this quiet area dropping off and collecting children. In our view it is essential to build segregated cycle lanes to meet the aspiration for children to cycle to school.
18. Alternatively there should be very significant restrictions on car access to the whole of section 19. We strongly support the *no entry except cycles* into Church Lane.
19. Our overall view is that section 19 adds very little to the existing quiet area. We do not think that it will attract commuters. Cyclist travelling south from our office are highly unlikely to use the Church Lane start to the superhighway.

Section 18

20. The current crossing from Church Lane to Broadwater Road is a *nightmare*. We do not think that you have done enough to reduce the speed of cars and we are not at all persuaded that pedestrian refuge islands will significantly increase cyclist protection.
21. We would like to see cyclist activated controlled lights to stop the traffic for a sufficient period of time to enable cyclists to cross between Church Lane and Broadwater Road.

22. We have a major problem with the Broadwater Road (the road is one way for cars travelling from The Avenue to Lordship Lane).
23. We regard the arrangement whereby cyclists travelling from Lordship Lane to the Avenue cycle *against* the flow of one-way traffic as dangerous.
24. Cycling along Broadwater Road generally feels *unsafe*. It is never clear that the oncoming motorcar accepts and is aware of the cyclists' right to travel the "wrong way" down the one-way street. There is already a reasonable amount of signage, but we never feel confident that this is understood by the motor vehicle, nor that it will be respected.
25. Furthermore, because Broadwater Road is a one-way street, all the vehicles parked on either side of the road are facing in the direction of Lordship Lane. There is a persistent risk of an opening car door. The 20 mile an hour speed limit on Broadwater Road is simply not respected. Cars travelling along the one-way road are able to speed and there is a lack of enforcement.
26. Additionally Broadwater Road is a busy road and there is very often significant congestion at the junction with Lordship Lane.
27. The link between Sperling Road and Napier Road needs to be very clearly signed. We recommend a pedestrian island on very sharp bend between Napier Road and Strode Road because cars swing round that sharp bend. Cars should not be travelling round the bend at anything more than 10 miles an hour. The passageway needs to have clear cycleway markings. Pedestrians and cyclists need to really understand which part of the passageway they should be travelling on.
28. Napier Road is also a dangerous and confusing road with the direction of one-way traffic *changing* at virtually every junction. Parked cars remain hazardous. While cycling against one way motor traffic, a cyclist has to be extremely focused on the oncoming traffic, which is all too often approaching at speed, forcing the cyclist to move far too close to the line of parked cars and the ever present threat of an opening door. Cyclists should pass parked cars at a 1 meter distance so as to avoid contact with opening doors. That is not possible on Napier Road.
29. Looking at Napier Road, in our view, cycling commuters will prefer to stay on the main High Road and this "quietway" route will be of limited value.
30. On balance the proposed addition of a traffic island at the junction of Napier Road and Loxwood Road is welcome, but you need to take into account the effect that traffic islands have on cars. Traffic islands make cars swing towards the pavement, and as a result towards any passing cyclist. Traffic islands therefore have the effect of slowing down cars, but that can be at the expense of cyclist safety. The design will be very important.
31. Throughout this section of the route we recommend significant extensions of double yellow lines at junctions. We would like to see that feature throughout the route and not just at the crossing of the Avenue.

Section17

32. This section of the route runs along Philip Lane.

33. An advisory cycle lane is wholly inadequate and the section requires a segregated cycle lane with a raised curb for protection. There is ample room to achieve that outcome. Imaginative arrangements could be explored utilising the land in front of the swimming pool.
34. We are extremely disappointed to see that you have only proposed an advisory cycle lane on Philip Lane. In our view the cycle lane should be **mandatory** and at a very minimum marked with a solid continuous white line. However we believe that even a mandatory cycle lane will not provide the level of protection that should be a minimum expectation on the proposed superhighway.
35. Philip Lane is a busy road used by lorries, buses and cars. All motorised vehicles will swing into the cycle lane unless there is a physical impediment.
36. We are also disappointed to see on the published plans for section 17 that there are no express proposals to prohibit car parking in the stretch of the route along Philip Lane between Napier Road and Arnold Road.
37. One of the most common characteristics of *advisory cycle lanes* is that cars are very often parked in them, completely depriving them of any benefits whatsoever.
38. We note that the bus stops at Greyhound Road will be moved eastwards but we are unclear as to the benefits to be gained by that. It seems that the bus stops remain directly on top of the *advisory* cycle lane. That outcome is entirely unsatisfactory and unsafe.
39. We would like to see a system of traffic lights controlling the stretch of the route between Arnold Road and Napier Road which gives priority to cyclists trying to use the superhighway.
40. We also recommend a total restriction on vehicles turning right out of town hall approach onto Philip Lane. Such a restriction can be achieved by traffic lights or traffic islands. The restriction is essential to give protection to cyclists turning right from Philip Lane into Town Hall Approach road.

Section 16

41. We regard the arrangements for the Town Hall Approach Road to be wholly unsatisfactory. There is ample space available to the west of Tottenham Green, including the very wide pavement in front of the Bernie Grant Arts Centre and the old Tottenham Town Hall to enable properly constructed *segregated* cycle paths to be introduced.
42. The proposed arrangements for cyclists travelling between West Green Road to Town Hall Approach Road are extremely unsatisfactory. You are proposing a shared pedestrian-cyclist area with a painted cycle track on the pavement. In our view, as noted above you should be introducing a properly *segregated* cycle lane which will take road space from the 6 lanes of traffic currently dominating this stretch of the High Road. This is the point at which the superhighway is 6 miles from the city and 4 miles from Dalston and you can do a lot better at this point.

43. We do not believe it is safe to route what is intended to be a *superhighway* along this stretch of pavement (West Green Road to Town Hall Approach Road). You have taken no account of the very large numbers of students coming in and out of the College of Haringey Enfield and North East London which is prominently located on this stretch of the High Road. According to the NUS there are 5,368 students at the site (4,338 are full-time and 1,030 part-time). In addition there is the very busy Seven Sisters tube station and bus stops on the High Road which generate large volumes of pedestrians. It is simply not safe and not practical to route a superhighway along this stretch of pavement. You are creating an environment in which accidents are bound to happen and which is ripe for conflict.
44. We note that there is a *current* shared use arrangement but it is virtually invisible, denoted by little more than an occasional paving stone with a bicycle sign embedded on it. In line with our comments above in connection with the new Tottenham stadium, we urge you to be more aspirational in connection with the *volumes of journeys* that could be made to the College by bicycle. Current bicycle use at the College appears from the outsider to be very low. There are only 5 bicycle stands outside the college. There is a bicycle shelter in a car park that appears to accommodate 6 stands. To the right of the college there is a larger shelter with 8 stands but the locks on the gates have been ***broken*** and it is no longer possible to lock that bicycle shelter. It has the distinct look of neglect. With over 5,000 students and a prime location on a superhighway, TFL should be planning for a very significant increase in cycling in the area.

Conclusion

45. We very much hope that serious consideration will be given to developing the superhighway between section 19 and section 16 so as to achieve safe provision for cycling along the direct route to and from the city. We are but one business in the area and we are confident that such a development would enormously benefit our existing cycling staff and help us to attract staff.
46. We believe that we are a pretty good model demonstrating what can be achieved in terms of cycling numbers with relatively little effort and cost. We urgently need to see a very significant policy change in favour of safe cycling infrastructure that will enable cycling without risking serious injury or death.
47. We believe that there is an overwhelming environmental and economic case to be made for the construction of safe cycling facilities. Safety means segregated provision. Your proposals fall considerably short on sections 19 – 16.

Yours sincerely



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for and on behalf of Wilson Solicitors LLP