

# Response ID ANON-U6AY-5DUT-7

Submitted to **Proposed changes to Borough High Street at the junction with Marshalsea Road and Great Dover Street**  
Submitted on **2017-12-01 12:38:41**

## Our proposals

### 1 Do you support or oppose our overall proposals for Borough High Street at the junction with Marshalsea Road and Great Dover Street?

Neither support nor oppose

### 2 Do you have any comments on our proposals?

#### Comments:

While the proposed creation of a formal crossing on the north-eastern arm of the junction is welcome (and long awaited), there are several aspects of this proposed scheme that we feel require significant revision. Overall, we would suggest that the scheme proposed is not compliant with the draft Mayor's Transport Strategy and needs to be revised accordingly.

The language of the consultation is revealing as it talks about the proposals having no significant impact on the capacity of the junction and increasing flow through the junction. It does not mention the fact that there is a tube station that is a destination for large numbers of pedestrians (and adjacent to the large and new Brandon House redevelopment) and that the conditions for them are currently inhospitable with an extremely constrained space at the entrance to the tube station where narrow footways are exacerbated by guardrail and major items of clutter on the footway. The existing difficult formal crossings are taken as a given even though they are all staggered and extremely difficult for people with disabilities.

The language of the draft MTS makes the change in policy extremely clear towards the prioritisation of public transport and people who are walking and cycling "To realise all the benefits of improved street environments, the uses of the whole street, from building line to building line, must be considered when making any changes at street level. Walking, cycling, and public transport should be prioritised, taking space from less efficient general traffic where required to minimise conflicts between complementary active and sustainable modes."

We would argue that this scheme fails to take this approach. Yes – there is a small extension to the bus lane to the north on Borough High Street and yes formal crossings are now created on all arms of the junction BUT flow for all vehicular traffic is maintained and facilitated rather the changes focusing on a) radically improving conditions for buses and b) improving conditions for those who are walking and cycling. We would argue that the stated aim in the consultation of improving road safety "It has been the location of a high number of collisions, many of which involved pedestrians or cyclists" is not realised as the aim of significantly improving conditions and safety for people who are walking and cycling has largely been sacrificed to the goal of maintaining vehicular capacity.

The following are elements of the scheme that fail to improve conditions for people who are walking and cycling in an attempt to attain this single goal of maintaining overall vehicle flows. Where appropriate, the suggestions are made that are needed for the scheme to be compliant with the policies and practice proposed in the draft MTS:

- 1) The absence of straight-ahead crossings for pedestrians; this is something which is very much needed at such a busy location for pedestrians and their omission is the most significant dis-benefit for those on foot. This would also allow the pedestrian crossings to be placed far closer to the pedestrian desire line (as is not the case on the Great Dover Street arm). The revisions to the recent scheme on Edgware Road/Harrowby St/Burwood Place and the provisions of straight-ahead crossings show that this is possible on a busy part of the TLRN ([https://twitter.com/W\\_Bradley/status/931461887098867712](https://twitter.com/W_Bradley/status/931461887098867712))
- 2) No improvements to the environment directly outside Borough Tube Station. This is a key location that is not addressed in any way in these designs. The maintenance of a left turn lane for vehicles as well as a straight-ahead lane and a right turn lane means that no increase to the footway at this location can be contemplated. Improvements are needed in the capacity for buses AND for pedestrians and if that is at the expense of other motorised vehicular movements then that is in line with the MTS policies.
- 3) The new kerb alignment to improve turning ability for large vehicles from Great Dover St to Borough High Street is extremely detrimental as vehicles already turn at high speed at this location causing intimidation to people crossing on foot. This should be reconsidered or other measures should be included to compensate pedestrians for improved conditions for vehicles (eg a raised crossing).
- 4) The islands currently proposed are extremely constrained for people with reduced mobility. This issue could be addressed if straight-ahead crossings were provided on all four arms. Improving conditions for people with disabilities is a core aim of the draft MTS.
- 5) The biggest risk for cyclists is from collisions with left-turning vehicles at the GDS to BHS south junction and at the BHS north to GDS junction. At these junctions most cyclists go straight on, about 200-500 per hour at peak, but half the motor traffic (250 vehicles per hour) turns left. Five of 9 collisions with cyclists in the 2010-2015 period are shown on Stats19 to have occurred at the GDS to BHS south junction. There are several ways to reduce the left hook risk, none of which are proposed in the consultation plan. An early start is often provided. This helps a little, but is generally seen as insufficient on junctions where many cyclists arrive at the stop line well after the general green stage has begun. A separate green phase for cyclists is effective, but adds a stage to the overall light cycle and so reduces junction capacity. A good solution is to use "hold-the-left" signalling. The Hold-the-Left (or Cycle Segregated) junction design has been used by TfL on several junctions now (see <https://www.youtube.com/watch?v=JFL-c7Sv9Q8>). It involves separating left-turning and straight on traffic in time. It does not increase the number of light stages, and so leaves junction capacity unchanged. In addition, it allows for single stage pedestrian crossings on all arms of the junction. Cyclists need to be in a segregated approach lane at least as long as the typical traffic queue, so space is required. There is room here for cycle lanes if the number of general traffic lanes is reduced, or they are narrowed. Note that the proposed ASLs also require lead-in lanes, they have little value without. The London Cycling Design Standard (5.4.9) states "A mandatory lead-in lane to an ASL is recommended" and "the lead-in should be as long as the maximum general traffic queue length during peak periods." Thus even with an inadequate ASL design there are the same space requirements as a Hold-the-left design (More information about Hold-the Left junction design is at <http://healthyriders.weebly.com/hold-the-left-junctions.html>.)

Note also that a segregated cycle route with segregated cycle lanes is needed all along both Borough High St and Gt Dover St. Both are in the top 5% of for cycling demand and propensity to increase cycling (Strategic Cycling Analysis, Mayor of London, June 2017). Putting segregation close to the Borough junction could be the first step in this process.

- 6) No 20mph limit is proposed. There is no reason that the changes to this junction could not be combined with a 20mph limit that would a) connect the scheme

better with the existing 20mph limit on the surrounding borough roads and b) create a link to the 20mph limits on the TLRN that operate in the City of London to the north and on London Bridge. It is a major anomaly that Borough High Street (which is a road with an extremely high "place" function) is not included as part of the 20mph on the TLRN.

7) The retention only of 7am to 7pm Bus Lanes. Given the importance of bus priority in this corridor and in the absence of segregated cycle lanes and given the large volumes of people cycling, the hours of bus lane operation should be extended to 24/7.

Overall it is time that the policies arising from the draft MTS are now fully included in TLRN schemes and that they are designed within the context of the forthcoming Vision Zero for London plan. Merely maintaining or improving vehicular capacity in TfL schemes is no longer enough. Proposals should be "smart" enough to improve capacity for public transport and address poor conditions for people who are on foot and who are cycling even if there are dis-benefits to other forms of motorised vehicular travel.

## About you

### 3 What is your name?

**Name:**

Jeremy Leach

### 4 What is your email address?

**Email:**

jeremyleach@posteo.net

### 5 Please provide us with your postcode?

**Postcode:**

SE17 3EQ

### 6 Are you (please tick all boxes that apply):

Not local but interested in the scheme

**Other:**

### 7 If responding on behalf of an organisation, business or campaign group, please provide us with the name:

**Organisation:**

London Living Streets

### 8 How did you find out about this consultation?

Received an email from TfL

**Other:**

### 9 What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Very good

**Do you have any further comments about the quality of the consultation material?:**

Very good. As always info on vehicle speeds would be of value and info on pedestrians flows and comfort levels in the existing and proposed scheme would be helpful.

## Equality Monitoring

### 10 Gender:

Male

### 11 Ethnic Group:

Not Answered

### 12 Age:

56-60

### 13 Sexual Orientation:

Not Answered

**14 Religious faith:**

Not Answered

**15 Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (Please include problems related to old age)**

No