

CS9 Cycle Superhighway Consultation

Submission from Chiswick Liberal Democrats

The Chiswick Liberal Democrats are fully supportive of the broad aspirations of increasing the use of walking, cycling and public transport in order to improve health, air quality and safety, and welcome programmes that deliver on these goals. **Unfortunately, with regret we cannot support the proposed Chiswick section of the CS9 cycle super highway in its current form. In our view TFL have failed to provide evidence that the CS9 scheme will deliver on these benefits for Chiswick.**

Based on the data provided by TFL and their own guidelines for cycle route planning the current proposed plans do not meet the basic objectives of the CS9 scheme itself and are likely to have a detrimental effect on the community of Chiswick.

This scheme is projected to cost several million pounds and be a long term infrastructure solution within Chiswick and elsewhere, and as such it is paramount that this investment supports all the forms of transport it is supposed to. At the moment the only tangible benefit that is presented is that to cyclists (travel times and safety), whereas both Chiswick pedestrians and users of public transport suffer detrimental effects to their quality of experience. **This is a classic case of top down targets driving decisions with little consideration of local needs.**

To make this scheme deliver the desired benefits for Chiswick, the Chiswick Liberal Democrats want to see:

- A robust evidence based demonstration that pollution in Chiswick will actively decrease due to the CS9 scheme
- Classification of Chiswick High Road as a 'High Street' (street type M2/P2) and the implementation of cycle intervention that recognises Chiswick High Road's status as a focal point for the local community with shops and restaurants along both sides of the road which attract high numbers of people. This status results in frequent crossing of paths (pedestrian and cycle 'desire lines') and is consequently unsuitable for the currently proposed segregated off-carriageway cycle lanes
- A clear improvement plan and extension to the A4 cycle provisions, either as part of CS9 or to complement it
- Provision of clear evidence (including modelling and case study data) that the current CS9 plans for Chiswick support and improve TFLs **Healthy Streets Indicators, pedestrian experience and public transport services**
- An holistic approach to planning for Chiswick that takes into account its conservation area status and aims to reduce pollution through wider consideration of investment in multiple approaches e.g. urban greening, improved public transport links (Piccadilly Line stop at Turnham Green), increased access to electric car charging points

We have 3 main concerns with the proposed CS9 plans for Chiswick, they are outlined below:

- 1. Chiswick High Road is currently being classified and treated as a "High Road" (M3/P2) as opposed to a "High Street" (M2/P2), making the emphasis of CS9 in Chiswick on 'through' traffic at the expense of pedestrians, the local community and businesses**

Following the review by the Roads Task Force, London streets are classified into one of 9 types based on an assessment of the 'place function' and the 'movement function'. Although not prescriptive, TFL provides

guidance as to which classification would be deemed applicable for each function based on the local circumstances, and then provides further guidance as to the likely range of levels of intervention for cycling infrastructure that would be appropriate.

Degree of separation (between cyclists and motorised vehicles)	Low place function			Medium place function			High place function		
	Arterial road	Connector	Local street	High road	High street	Town square	City hub	City street	City place
A. Full separation on links (eg cycle track, segregated lane)	High	High	Low	High	High	Low	Low	Low	Low
B. Dedicated on-carriageway lanes (eg mandatory or light segregated lanes)	Low	High	Low	High	High	Low	Low	Low	Low
C. Shared on-carriageway lanes (eg advisory lanes, bus/cycle lanes)	Low	High	Low	High	High	Low	Low	Low	Low
D. Integration with other vehicles	Low	Low	Low	Low	Low	Low	Low	Low	Low

Figure 1: TFL Guidance on Degree of Separation between cyclists and motorists

The proposal for CS9 as it currently stands intends to implement type A full separation (see table above) which implies Chiswick High Road has been defined as a “High Road”. The main priorities of this designation emphasise travel through and along the street and include according to TFL’s own guidance:

- Reliable journeys for vehicles
- Bus priority
- Safer, inclusive and higher quality pedestrian environment
- Accessibility of local services, shops and access for freight

In contrast for a ‘high street’ the emphasis is firmly on pedestrians, access to local businesses and amenities. TFL outlines the main priorities as being:

- A high quality environment for pedestrians
- Good facilities for service vehicles to ensure local businesses can easily receive deliveries
- Road safety and a slower speed environment
- Accessibility for sustainable modes, for example, buses and cyclists

This definition is far more reflective of the village feel, community and local shopping hub Chiswick High Road represents. **It should be noted that the highest degrees of separation of cycle ways are not recommended for this type of location where there is a regular crossing over of pedestrian and cycle desire lines.**

Our alternative classification of Chiswick High Road as a “high street” aligns with TFL’s example ‘case studies’ for each street classification. An example case study of a “high street” (M2/P2) is the A5, Burnt Oak Broadway, which is an important local connection but runs broadly parallel to the arterial roads of the A41 and M1; Burnt Oak Broadway is characterised as being a focal point for the local community, with the large number of shops and businesses meaning it attracts high numbers of people, and that many goods vehicles use the road to supply the local businesses.

Chiswick High Road is also an important local connecting road but which runs parallel to the main arterial road (in this case the A4, which is also a major bus corridor), and is similarly characterised by being a local focal point with many shops restaurants and businesses which leads to high levels of kerb-side activity, high volumes of pedestrians and complex patterns of pedestrian movement in Chiswick. It is not however a major through-way or one with consistent traffic levels but has clear peak times (as demonstrated by TFL’s own traffic analysis), with the vast bulk of the east-west/west-east traffic flow being accommodated by the A4.

Chiswick High Road has an important ‘place’ function in the local area, but it is also clearly not an arterial road or large radial route, and to treat it as such would be inappropriate given its current profile; it would also mean that the TFL guidance relating to implementation of cycling improvements would be misapplied with excessive

priority then given to through traffic ('Reliable journeys for vehicles') which would certainly improve provision for cycling but to the detriment of what should be the highest priorities for a 'high street' type of road ('A high quality environment for pedestrians' and 'Good facilities for service vehicles to ensure local businesses can easily receive deliveries'). **Significant improvements to cycling provision can and should be made in conjunction with ensuring a better pedestrian experience and optimal access to businesses on both sides of the road, rather than to their detriment due to a misapplication of the TFL guidelines and main priorities as in the current CS9 proposals for Chiswick.**

In contrast TFL example case studies of a "high road" (M3/P2) are the A24 in Tooting which is a large radial route with high traffic flows into central London, with traffic levels generally consistent throughout the day with no clear peak period, and the A10 in Stoke Newington which again is a major radial route and is also one of London's busiest bus corridors. **Chiswick High Road is not a "high road" in this sense.**

- This fundamental mistake in the planning approach has led to an over emphasis of cycling intervention at the expense of walking and public transport in Chiswick. This will reduce desirability for other modes of travel and presents significant accessibility challenges for vulnerable and disadvantaged groups.**

One of the main objectives of CS9 as a whole is connecting and improving town centres. The scheme in Chiswick appears to be solely focused on travel and commuting via cycling. Most concerning is the longer travel times for buses, which we believe will be a disincentive to travel into and out of Chiswick as a whole. Buses are one of the most affordable and accessible forms of transport for vulnerable groups (those with a disability, the elderly, children). TFL has stated increased bus travel times by as much as 5 – 10 minutes in Chiswick at peak times eastbound. As anyone who commutes knows, additional time in the morning and evening makes a significant difference to quality of life. Bus services in Chiswick with their affordable price point and excellent facilities for young, elderly and those with disabilities are going to be worse off as a result of the current CS9 plans. Indeed the fact that the cycle super highway will be between the footpath and bus stops on Chiswick High Road creates a further impediment to public transport use by vulnerable groups.

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Correct as at 15 September 2017	2015 journey times (minutes)			2021 journey time* (minutes)			2021 journey time with CS9 scheme (minutes)			Impact of CS9 scheme on 2021 scenario (minutes)**
Buses A sample of journey times on routes through the scheme area (minutes as a range)	Current journeys		Bands	Journeys modelled		Bands	Journeys modelled		Bands	Bands
	237 (Ealing Road - Goldhawk Road)	Eastbound	20-25	237 (Ealing Road - Goldhawk Road)	Eastbound	20-25	237 (Ealing Road - Goldhawk Road)	Eastbound	25-30	0-5
	Westbound	18-20		Westbound	20-25		Westbound	20-25	0-5	0-5
65 (Ealing Road - Kew Bridge)	Eastbound	9-9	65 (Ealing Road - Kew Bridge)	Eastbound	7-8	65 (Ealing Road - Kew Bridge)	Eastbound	10-12	2-4	2-4
	Westbound	2-3		Westbound	2-9		Westbound	2-3	No change	No change
391 (Kew Bridge - North End Road)	Eastbound	30-35	391 (Kew Bridge - North End Road)	Eastbound	30-35	391 (Kew Bridge - North End Road)	Eastbound	30-35	0-5	0-5
	Westbound	25-30		Westbound	25-30		Westbound	30-35	0-5	0-5
27 (Chiswick Business Park - Olympia)	Eastbound	25-30	27 (Chiswick Business Park - Olympia)	Eastbound	25-30	27 (Chiswick Business Park - Olympia)	Eastbound	25-30	0-5	0-5
	Westbound	20-25		Westbound	20-25		Westbound	25-30	No change	No change
9 (Hammersmith Bus Station - Holland Road)	Eastbound	7-8	9 (Hammersmith Bus Station - Holland Road)	Eastbound	10-12	9 (Hammersmith Bus Station - Holland Road)	Eastbound	7-8	-(2-4)	-(2-4)
	Westbound	7-8		Westbound	7-8		Westbound	6-7	-(0-1)	-(0-1)
220 (Shepherds Bush Road - Hammersmith Bus Station)	Northbound	2-3	220 (Shepherds Bush Road - Hammersmith Bus Station)	Northbound	2-3	220 (Shepherds Bush Road - Hammersmith Bus Station)	Northbound	2-3	-(0-1)	-(0-1)
	Southbound	1-2		Southbound	2-3		Southbound	2-3	No change	No change

Figure 2: CS9 Modelling results for bus morning peak times. NOTE THAT THE 27 BUS ROUTE FOR CHISWICK HAS UP TO A 5 MINUTE INCREASE EASTBOUND

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Correct as at 15 September 2017	2015 journey times (minutes)			2021 journey time* (minutes)			2021 journey time with CS9 scheme (minutes)			Impact of CS9 scheme on 2021 scenario (minutes)**
Buses A sample of journey times on routes through the scheme area (minutes as a range)	Current journeys		Bands	Journeys modelled		Bands	Journeys modelled		Bands	Bands
	237 (Ealing Road - Goldhawk Road)	Eastbound	20-25	237 (Ealing Road - Goldhawk Road)	Eastbound	20-25	237 (Ealing Road - Goldhawk Road)	Eastbound	30-35	5-10
	Westbound	20-25		Westbound	25-30		Westbound	20-25	-(0-5)	-(0-5)
65 (Ealing Road - Kew Bridge)	Eastbound	5-6	65 (Ealing Road - Kew Bridge)	Eastbound	7-8	65 (Ealing Road - Kew Bridge)	Eastbound	12-14	5-7	5-7
	Westbound	3-4		Westbound	2-3		Westbound	3-4	0-1	0-1
391 (Kew Bridge - North End Road)	Eastbound	30-35	391 (Kew Bridge - North End Road)	Eastbound	30-35	391 (Kew Bridge - North End Road)	Eastbound	35-40	5-10	5-10
	Westbound	30-35		Westbound	35-40		Westbound	35-40	0-5	0-5
27 (Chiswick Business Park - Olympia)	Eastbound	25-30	27 (Chiswick Business Park - Olympia)	Eastbound	25-30	27 (Chiswick Business Park - Olympia)	Eastbound	30-35	5-10	5-10
	Westbound	25-30		Westbound	25-30		Westbound	25-30	-(0-5)	-(0-5)
9 (Hammersmith Bus Station - Holland Road)	Eastbound	6-7	9 (Hammersmith Bus Station - Holland Road)	Eastbound	8-9	9 (Hammersmith Bus Station - Holland Road)	Eastbound	8-9	-(0-1)	-(0-1)
	Westbound	8-9		Westbound	7-8		Westbound	7-8	-(0-1)	-(0-1)
220 (Shepherds Bush Road - Hammersmith Bus Station)	Northbound	2-3	220 (Shepherds Bush Road - Hammersmith Bus Station)	Northbound	2-3	220 (Shepherds Bush Road - Hammersmith Bus Station)	Northbound	3-4	0-1	0-1
	Southbound	2-3		Southbound	2-3		Southbound	2-3	No change	No change

Figure 3: CS9 Modelling results for bus afternoon / evening peak times. NOTE THE 27 CHISWICK BUS ROUTE SEES INCREASED JOURNEY TIMES OF UP TO 10 MINUTES EASTBOUND

Of additional concern is the lack of impact assessment of the proposed scheme on the E3 and 272 bus routes that connect north Chiswick, Chiswick High Road and Grove Park. These are vital routes for Chiswick residents to go to and from the High Road. The E3 is also a significant school route. Any increase in times to these routes will be detrimental to connecting the two parts of Chiswick separated by the A4. We are very disappointed that

TFL has failed to assess the impact on these essential routes for local Chiswick residents, instead focusing on 'through' routes.

- The plans for Chiswick as they stand diminish the pedestrian experience on the High Road; it will be more crowded, feel less safe and potentially have increased pollution. This will adversely impact the community in Chiswick.

A stated objective of CS9 is facilitating and encouraging active travel in west London. The scheme in Chiswick appears to be solely focused on travel via cycling at the expense of walking, which, based on TFL's Healthy Street Indicators will become less desirable than before. Our concern is based on the consultation document provided by TFL and in particular the estimated journey times for Chiswick motor and pedestrian routes. TFL is anticipating increased journey times for **the vast majority of Chiswick routes** for traffic and pedestrians which will create a busier, more crowded road and pavements and hence a poorer pedestrian experience. **This is demonstrated by the data which predict an overall trend towards longer journey times in Chiswick for all modes of transport bar cyclists under the current scheme, with pedestrians particularly affected.**

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	2015 journey times (seconds)			2021 journey time* (seconds)			2021 journey time with CS9 scheme (seconds)			Impact of CS9 scheme on 2021 scenario (seconds)**
	Current journeys		Bands	Journeys modelled		Bands	Journeys modelled		Bands	
Walking Total average wait times to complete crossing movements (seconds as a range)	Kew Road / Kew Bridge Road	North-west to East	120-150	Kew Road / Kew Bridge Road	North-west to East	120-150	Kew Road / Kew Bridge Road	North-west to East	120-150	0-30
		East to North-west	150-180		East to North-west	150-180		East to North-west	90-60	-(90-120)
		North-west to South-west	60-90		North-west to South-west	60-90		North-west to South-west	90-120	0-30
		South-west to North-west	30-60		South-west to North-west	90-60		South-west to North-west	150-180	90-120
		South-west to East	180-210		South-west to East	180-210		South-west to East	120-150	-(30-60)
		East to South-west	240-270		East to South-west	240-270		East to South-west	120-150	-(90-120)
	Chiswick High Road / Wellesley Road	West to East	60-90	Chiswick High Road / Wellesley Road	West to East	60-90	Chiswick High Road / Wellesley Road	West to East	240-270	180-210
		East to West	90-120		East to West	90-120		East to West	150-180	60-90
		North to East	0-30		North to East	0-30		North to East	150-180	120-150
		East to North	60-90		East to North	0-30		East to North	30-60	30-60

Figure 4: CS9 Modelling results for pedestrians morning peak times: NOTE THE INCREASE OF CHISWICK HIGH ROAD CROSSING TIMES FOR ALL CROSSINGS, ONE INCREASING TO OVER 4 MINUTES FROM JUST OVER 1 MINUTE (A 300% INCREASE IN CROSSING TIME)

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	2015 journey times (seconds)			2021 journey time* (seconds)			2021 journey time with CS9 scheme (seconds)			Impact of CS9 scheme on 2021 scenario (seconds)**
	Current journeys		Bands	Journeys modelled		Bands	Journeys modelled		Bands	
Walking Total average wait times to complete crossing movements (seconds as a range)	Kew Road / Kew Bridge Road	North-west to East	60-90	Kew Road / Kew Bridge Road	North-west to East	60-90	Kew Road / Kew Bridge Road	North-west to East	30-60	-(30-60)
		East to North-west	90-120		East to North-west	90-120		East to North-west	90-120	0-30
		North-west to South-west	60-90		North-west to South-west	60-90		North-west to South-west	60-90	0-30
		South-west to North-west	30-60		South-west to North-west	30-60		South-west to North-west	120-150	90-120
		South-west to East	120-150		South-west to East	90-120		South-west to East	90-120	-(0-30)
		East to South-west	150-180		East to South-west	150-180		East to South-west	120-150	-(0-30)
	Chiswick High Road / Wellesley Road	West to East	30-60	Chiswick High Road / Wellesley Road	West to East	30-60	Chiswick High Road / Wellesley Road	West to East	120-150	60-90
		East to West	30-60		East to West	30-60		East to West	30-60	0-30
		North to East	0-30		North to East	0-30		North to East	120-150	90-120
		East to North	30-60		East to North	0-30		East to North	30-60	0-30

Figure 5: CS9 Modelling results for pedestrians afternoon / evening peak times. NOTE THE INCREASE IN CHISWICK HIGH ROAD CROSSING TIMES FOR ALL CROSSINGS, ONE INCREASING TO 2.5 MINS FROM 30 SECONDS (A 400% INCREASE IN CROSSING TIME)

Cycle Superhighway 9 - Modelling Results AM

Correct as at 15 September 2017	2015 journey times (minutes)			2021 journey time* (minutes)			2021 journey time with CS9 scheme (minutes)			Impact of CS9 scheme on 2021 scenario (minutes)**
	Current journeys		Bands	Journeys modelled		Bands	Journeys modelled		Bands	
Traffic Average journey times (minutes as a range)	Ealing Road - Holland Road	Eastbound	30-35	Ealing Road - Holland Road	Eastbound	35-40	Ealing Road - Holland Road	Eastbound	40-45	0-5
	Holland Road - Ealing Road	Westbound	25-30	Holland Road - Ealing Road	Westbound	25-30	Holland Road - Ealing Road	Westbound	35-40	5-10
	Ealing Road - Kew Bridge	Eastbound	6-7	Ealing Road - Kew Bridge	Eastbound	5-6	Ealing Road - Kew Bridge	Eastbound	10-12	5-7
	Kew Bridge - Ealing Road	Westbound	1-2	Kew Bridge - Ealing Road	Westbound	1-2	Kew Bridge - Ealing Road	Westbound	1-2	0-1
	Kew Bridge - Chiswick Roundabout	Eastbound	2-3	Kew Bridge - Chiswick Roundabout	Eastbound	1-2	Kew Bridge - Chiswick Roundabout	Eastbound	1-2	No change
	Chiswick Roundabout - Kew Bridge	Westbound	3-4	Chiswick Roundabout - Kew Bridge	Westbound	3-4	Chiswick Roundabout - Kew Bridge	Westbound	7-8	4-5
	Chiswick Roundabout - Goldhawk Road	Eastbound	10-12	Chiswick Roundabout - Goldhawk Road	Eastbound	12-14	Chiswick Roundabout - Goldhawk Road	Eastbound	12-14	No change
	Goldhawk Road - Chiswick Roundabout	Westbound	10-12	Goldhawk Road - Chiswick Roundabout	Westbound	10-12	Goldhawk Road - Chiswick Roundabout	Westbound	14-16	3-5
	Goldhawk Road - Holland Road	Eastbound	12-14	Goldhawk Road - Holland Road	Eastbound	18-20	Goldhawk Road - Holland Road	Eastbound	14-16	-(3-5)
	Holland Road - Goldhawk Road	Westbound	10-12	Holland Road - Goldhawk Road	Westbound	10-12	Holland Road - Goldhawk Road	Westbound	10-12	0-2
	Hammersmith Bridge Road - Shepherds Bush Road	Northbound	3-4	Hammersmith Bridge Road - Shepherds Bush Road	Northbound	4-5	Hammersmith Bridge Road - Shepherds Bush Road	Northbound	3-4	-(0-1)
	Shepherds Bush Road - Hammersmith Bridge Road	Southbound	7-8	Shepherds Bush Road - Hammersmith Bridge Road	Southbound	7-8	Shepherds Bush Road - Hammersmith Bridge Road	Southbound	6-7	-(0-1)

Figure 6: CS9 Modelling results for traffic morning peak times. NOTE THE INCREASE BETWEEN CHISWICK ROUNDABOUT AND GOLDHAWK ROAD WESTBOUND OF UP TO 5 MINUTES

Cycle Superhighway 9 - Modelling Results PM

Correct as at 15 September 2017	2015 journey times (minutes)			2021 journey time* (minutes)			2021 journey time with CS9 scheme (minutes)			Impact of CS9 scheme on 2021 scenario (minutes)**
	Current journeys		Bands	Journeys modelled		Bands	Journeys modelled		Bands	
Traffic Average journey times (minutes as a range)	Ealing Road - Holland Road	Eastbound	30-35	Ealing Road - Holland Road	Eastbound	40-45	Ealing Road - Holland Road	Eastbound	50-55	5-10
	Holland Road - Ealing Road	Westbound	35-40	Holland Road - Ealing Road	Westbound	35-40	Holland Road - Ealing Road	Westbound	35-40	-(0-5)
	Ealing Road - Kew Bridge	Eastbound	4-5	Ealing Road - Kew Bridge	Eastbound	7-8	Ealing Road - Kew Bridge	Eastbound	14-16	7-9
	Kew Bridge - Ealing Road	Westbound	1-2	Kew Bridge - Ealing Road	Westbound	1-2	Kew Bridge - Ealing Road	Westbound	2-3	0-1
	Kew Bridge - Chiswick Roundabout	Eastbound	2-3	Kew Bridge - Chiswick Roundabout	Eastbound	2-3	Kew Bridge - Chiswick Roundabout	Eastbound	1-2	-(0-1)
	Chiswick Roundabout - Kew Bridge	Westbound	4-5	Chiswick Roundabout - Kew Bridge	Westbound	9-10	Chiswick Roundabout - Kew Bridge	Westbound	7-8	-(2-3)
	Chiswick Roundabout - Goldhawk Road	Eastbound	12-14	Chiswick Roundabout - Goldhawk Road	Eastbound	12-14	Chiswick Roundabout - Goldhawk Road	Eastbound	16-18	5-7
	Goldhawk Road - Chiswick Roundabout	Westbound	16-18	Goldhawk Road - Chiswick Roundabout	Westbound	14-16	Goldhawk Road - Chiswick Roundabout	Westbound	16-18	0-2
	Goldhawk Road - Holland Road	Eastbound	12-14	Goldhawk Road - Holland Road	Eastbound	20-25	Goldhawk Road - Holland Road	Eastbound	16-18	-(3-5)
	Holland Road - Goldhawk Road	Westbound	12-14	Holland Road - Goldhawk Road	Westbound	12-14	Holland Road - Goldhawk Road	Westbound	12-14	0-2
	Hammersmith Bridge Road - Shepherds Bush Road	Northbound	3-4	Hammersmith Bridge Road - Shepherds Bush Road	Northbound	4-5	Hammersmith Bridge Road - Shepherds Bush Road	Northbound	5-6	1-2
	Shepherds Bush Road - Hammersmith Bridge Road	Southbound	6-7	Shepherds Bush Road - Hammersmith Bridge Road	Southbound	7-8	Shepherds Bush Road - Hammersmith Bridge Road	Southbound	7-8	0-1

Figure 7: CS9 Modelling results for traffic afternoon / evening peak times. NOTE THE INCREASE OF JOURNEY TIMES FOR CHISWICK ROUNDABOUT AND GOLDHAWK ROAD ROUTES IN BOTH DIRECTIONS, ONE OF UP TO 7 MINUTES

The current design of CS9 in Chiswick is fundamentally at odds with the **Healthy Streets Approach** adopted by TFL that is supposed to encourage pedestrians and communities. The current plans directly conflict with 6 of the 10 Healthy Street Indicators. This implies that by TFL’s own criteria CS9 in its current form will diminish not enhance Chiswick High Road. Below is a list of the 6 Healthy Street Indicators that in our view the current CS9 proposal does not support:

- **Pedestrians from all walks of life:** the disincentives to use public transport outlined in the our second concern, potentially makes walking along Chiswick High Road less accessible and amenable for vulnerable and disadvantaged groups than it is currently.
- **People choose to walk, cycle and use public transport:** the only tangible benefit (journey times and safety) stated in the consultation is for cyclists, services for walking and public transport are worse than before with generally longer journey times and reduced facilities (smaller pavements, a cycle super highway between pavement and bus stops).
- **Clean air:** increased traffic journey time implies increased congestion or at least increased duration of any one vehicle being on Chiswick High Road for a journey. There is no data demonstrating that motor traffic will be reduced significantly and as such we can only assume that the scheme will generate increased emissions from motor vehicles, making the Chiswick High Road a less pleasant and healthy place to be. TFL has confirmed at a public forum¹ that no assessment of pollution impact and associated impact on public health has been made. Given this potential increased risk in an area which has one of the highest concentrations of pedestrians in London including young families a pollution impact assessment must be made to confirm there will be no adverse impact on public health due to the CS9 plans.
- **People feel safe:** There is significant concern amongst Chiswick residents about speeds of cyclists on the cycle super highway for family vs commuter use, particularly during the school run time when both

¹ <https://www.youtube.com/watch?v=ntvSKb0VrYI> see around 1:49:45

groups will be using the route. In addition there is considerable anxiety about the ability cross the cycle way safely. **We remain unconvinced by the evidence that TFL has provided that CS9 will improve safety for people who want to walk in Chiswick.** While undoubtedly the current scheme for Chiswick could improve safety for cyclists, there is no evidence provided that it will do so for pedestrians. Local residents have expressed significant concern of speeding cyclists closer to pedestrians, answered only by having policing of speed limits by TFL officials at the beginning of the initiative. This is not a long term, sustainable solution.

- **Not too noisy:** There is no indication that congestion or road traffic on the High Road will be reduced, nothing in the proposals supports noise reduction. Indeed slower journey times could increase noise from braking.
- **Easy to cross:** Very concerning for pedestrians is the projected increased crossing times for the High Road, with waits of up to 5 minutes being projected, more than 4x increases on the current crossings. This has a negative impact for vulnerable groups when crossing the road, it will take longer to get to crossing points and crucially makes it harder for businesses to attract custom across the road.
- **People feel relaxed:** This measure is dependent on streets and roads being clean and uncrowded. The narrowing of pavements with existing volumes means they will be more crowded and less relaxed. There is also a concern that trees are being removed as part of this exercise and with only a reference to best endeavours to protect other existing trees not currently earmarked for removal during construction work.

We welcome that the CS9 scheme has included elements that support the other 4 Healthy Streets Indicators including the increase of seating and shade, however these efforts are not sufficient to allay our concerns about the other factors.