



Graham Nash  
Transport for London  
197 Blackfriars Road  
Southwark  
London  
SE1 8NJ

30 December 2014

Dear Graham

**Re: Transforming Vauxhall Cross**

It was good to meet you at our public meeting on 9 December and thank you again for taking the stand. Your responses to the questions and answers increased local knowledge and understanding of the complexity of improving the Gyrotory.

As you know, the Kennington, Oval and Vauxhall Forum (KOVF) is a volunteer organisation supported by Lambeth Council. It has several objectives including Neighbourhood Planning and helping to deliver effective consultation using our local networks (Friends of Parks, Libraries, Residents, Tenants Associations etc.). Through our networks, we help extend the reach of consultations to those who might otherwise be overlooked helping to ensure that they have a voice in local developments that affect them. We trust that the views we present are representative of the views of the local community and results in better solutions for all.

We currently have a mailing list of some 500 emails and the combined membership of our groups (VGERTA, FOVP etc.) represent in excess of 3,000 local residents. We also work closely with businesses in the area, having on our governing Board, two members that represent Vauxhall One, the Business Improvement District for our area.

Due to the timing of the TfL Consultation in the lead up to the Christmas Period, we have been unable to discuss this response fully as a Board as our next meeting is not until 8 January and unfortunately the extended deadline of 2<sup>nd</sup> January. However, I have set down on behalf of KOVF, the key messages which were put forward at our public meeting on 9 December so that these can inform your analysis.

This letter comes in two parts:

- A) Feedback on the current proposals as presented and the KOV view
- B) Commentary on the consultation process

## A. FEEDBACK ON CURRENT PROPOSALS

1. KOVF welcomes TfL and Lambeth Council's initiative to improve the Gyratory. Although this area currently functions pretty well as a transport hub, allowing relative smooth flow of traffic, and a good link for commuters between bus, train and underground; we concur that it is not a good place for either cyclists or pedestrians.
2. KOVF also welcomes proposals that encourage healthy, safer travel options and that reduce noise levels and improve air quality. Additionally, with the developments in the Nine Elms Vauxhall Development Opportunity Area (NEV), KOVF agrees that the Gyratory needs to be reviewed to provide for existing and new populations of residents and workers.
3. KOVF supports the idea of two way working, which Lambeth Council is encouraging, to bring the area back to the human scale and improve connections across the area to the river, open spaces and surrounding parts. We see this as the opportunity of a generation to improve this major area of Central London. We are encouraged that this is the first consultation with a further one promised soon.
4. KOVF has looked at some additional ideas based on current consultation proposals for Vauxhall, which we think merit further consideration. The ideas relate primarily to the strategic road network and do not impact directly on the bus station. The ideas have been discussed informally with local businesses, residents, the public at the Oval Farmers' Market community stall and more recently at the latest KOVF public meeting. (a picture summarising the ideas is attached at Appendix 1 ). KOVF believes these proposed improvements would build on what TfL and Lambeth wish to deliver whilst providing a number of significant additional benefits to the area. The ideas are compatible with either retaining the existing bus station if so wished or an alternative solution. The key improvements are:

- Closure of South Lambeth Road section of gyratory to through traffic  
*(Space becomes shared use possibly a public piazza)*
- Two way working throughout the mini-gyratory  
*(Traffic flows along Durham Street reduce to point where shared use can be considered.)*

Our preliminary analysis indicates that the above would have the following potential benefits:

- **South Lambeth Place** would be freed up for an alternative use. Building on the success of Vauxhall Food Garden an indoor market or something similar would generate between 30 to 60 additional jobs. These jobs are likely to be for small enterprises and therefore attract local employment. Such a development would result in a much stronger District Centre when integrated with nearby developments that on their own would not reach their potential
- **Transport Hub** as most bus journeys should be quicker through Vauxhall compared with the current arrangements
- **Full two way working (including mini-gyratory)** will allow vehicles to enter the

Vauxhall area from any strategic road and leave by any other. As most common journeys can follow shortest practical 'desire line', air quality should improve due to relatively reduced CO2 and other emissions particularly in the Durham Street and close off section of South Lambeth Road.. Ambient sound levels would also reduce in those areas resulting in significantly improved public spaces..

- **South Lambeth Road** being closed to through traffic would allow this space to become shared use. Such a space would be a significant asset to aspirations for a District Centre. The space would act as a green link between Vauxhall Pleasure Gardens to Vauxhall Park building on other green link proposals in the area. In addition such a space would benefit existing businesses (increased foot fall as a result of improved public realm -).
- **Safer roads and public spaces** due to better segregation of cyclists, motor vehicles and pedestrians (Durham St and South Lambeth Road Public Piazza)
- **Safer routes to school** (St Anne's Primary in particular) and access to Vauxhall City Farm etc.

5. In terms of planning; Lambeth's current policy for Transport Interchanges is set out in Saved Policy 12 of the 2007 UDP. This is set to be replaced by Policy T4 of the Lambeth Local Plan, which is due to be adopted in around May 2015, and already has significant weight, having passed Examination in Public without significant modification. These are attached at Appendix 2 with key parts highlighted. KOVF notes in particular the emphasis on the highest standards of interchange including sufficient kerb space for buses. Most of these criteria are susceptible to quantification. Whilst this is the first consultation, at present TfL has spoken in terms of principle and generalities, whilst the KOVF suggestion is supported by significant observations and facts. It is important that TfL take the community and its intelligent capacity seriously, and provide modelling results and data, discussing future assumptions. In particular, when judging options, TfL should reveal the metrics it uses to judge them by, as was the case in previous studies of Vauxhall Gyratory improvement, such as the Burns and Nice Public Realm Study of 2010.

6. Question 9 of the Consultation asks for views on the redrawing of the Vauxhall District Centre boundary. KOVF has noted some contradictions that need to be resolved to get a meaningful outcome. KOVF is on record as critical of the existing boundary, which peculiarly excluded the Sainsbury superstore, set to contribute, on redevelopment, 7,000 sqm of net selling area to retail capacity. Given the conditional London Plan endorsement of a CAZ frontage at Vauxhall the size of a small District Centre, (around 10,000 to 20,000 sqm), the Sainsbury development alone will constitute between a third and a half of such a Centre. We are therefore pleased that the new proposed boundary would include it. But the new proposal practically includes the whole of the Lambeth element of the OAPF/Vauxhall SPD area, extending all the way up to Lambeth Bridge, and down a strip of South Lambeth Road south of Wyvil Road. The latter (along South Lambeth Road) is a local centre, and should therefore be outside the existing CAZ, given the London Plan definition of a District Centre:

*"District centres*

*– distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000–50,000 sq.m of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.”*

This therefore seems by contrast to the previous proposal an over-expansive boundary. At the same time, Table A2.2 identifies the incipient CAZ frontage at Vauxhall as in “Lambeth/**Wandsworth**”, which argues that some Wandsworth development, eg at Covent Garden Market North should at least be considered.”

We trust, that as agreed at our meeting TfL and Lambeth Council will be able to include these proposals as part of planned future consultation. KOVF looks forward to working with you to develop this scheme further.

This brings me on to the second part of my letter, where again we sincerely hope you will work with us in the future.

## **B. COMMENTARY ON CONSULTATION PROCESS**

As a forum, we naturally take consultation very seriously, as this is one of our prime purposes. KOVF acknowledges that TfL has done a lot to be flexible, extending the date for responses to this consultation (from 19 December to 2<sup>nd</sup> January), attending our meeting and keeping your displays on view on the evening of 9 December, as well as leafleting our area. However, it would be better for all if for the next stage

- (i) consultation materials are improved
- (ii) key information be made available e.g. accident maps, origins/destination data etc.
- (iii) TfL engage with key local people who can add some value to the process.

It is in everyone’s interest that this project progresses to a positive conclusion and we will do our bit to ensure that mistakes are avoided and opportunities not lost. It would therefore be helpful if TfL consult with KOV Forum on the materials that are presented for the next consultation. To some extent this happened with the Oval Junction Improvements project so we would like to build on that for Vauxhall.

A number of individuals have voiced concern over previous TfL consultations and the latest one on Vauxhall. It would probably be unhelpful to go through every concern raised but here are some examples to illustrate the type of thing that upsets some.

1. Apparent misleading statements in the leaflet such as:

*“**New and improved public spaces:** Through the changes to the road layout we will be able to provide new public spaces including more places to eat, drink shop and spend time within the centre of Vauxhall”*

The plans as presented appear to result in a net reduction of public space. Space

occupied by new commercial premises is different in planning terms and should not be considered as a public space.

## 2. Misleading current and future images

Whilst we appreciate the need for artist impressions, a number of people have independently pointed out that the photo of “Vauxhall now” was depicted in the rain with no one present (very untypical) whereas the drawing of Vauxhall in the future was depicted with sunshine.

Another source of bias in these images relates to the angle of the picture compared to the photo making a genuine comparison impossible. In looking at a picture the eye is naturally drawn to the vanishing point. For the photo that point is half way up, to the right and blocked off, whereas the one for the proposed terminus interchange is to the left, only 1/3<sup>rd</sup> up from the base of the picture (so proving more sky and a greater sense of open space) and at the end of an unblocked vista between high rise buildings of glass, concrete and steel. To offer a genuine comparison would require the images to be taken from exactly the same angle with transposed individuals from the photo onto the future designs.

## 3. Presentation of selective facts and need for transparency.

On page 7 of the leaflet the key benefits are listed. However, there is no mention of potentially slower journey times for some bus routes and motor vehicles and possible adverse impact on some local businesses etc. Also there are obvious benefits to some property owners and potential developers so these too should be listed in the interests of transparency.

We realise that it is still early in the design but KOVF considers this essential in any future consultation to incorporate local ideas and experience and allow for considered opinion. This data was provided by TfL for the Stockwell Cross consultation and KOVF sees this as vital to be included in future.

## 4. Use of leading questions in the questionnaire and the need for open mindedness

*“Q1. Do you support or oppose the overall aim of creating a thriving centre in Vauxhall around the central transport interchange?”*

Leading questions of this type undermine the validity of any survey. Put differently, why would any reasonable person oppose having a thriving centre and a central transport interchange? It is impossible for anybody therefore to respond in a meaningful way. This is also the first question and therefore sets the tone for the rest of the questionnaire.

As Macchiavelli said in the Art of War “Consult the many on what you might do; consult the few on what you are resolved to do.” By juxtaposing general questions of principle with a request for comment on a fully worked up scheme, TfL are in danger of giving the

impression that they are consulting on what has already been resolved. It is important that TfL are open to alternative ideas such as those identified by KOVF and give the appearance that they are receptive to all feedback.

#### 5. Consultation methodology

We note that although TfL puts a lot of effort into consultation, including this one for Vauxhall, there seems to be little mention of the statistical significance of findings and any bias therein. KOVF is concerned that the impacts of these changes require more effective consultation than seems to have been the case so far. For example, the choice of venue for public exhibitions and their times would only have reached a very small number of people compared with the many hundreds of thousands who travel through the area on a daily basis.

Also a number of people attending the public exhibitions were not happy that their views were being captured in the way they wanted. Some did not want to fill in the questionnaire made available but did want their views recorded somehow.

#### 6. Consultation contact details

The contact details given in the consultation are unsatisfactory. There is no named contact person and the telephone number given is inappropriate as this is the general TfL number for queries about journey plans and other general details. One of our Board members has written to the general consultation enquiry line on more than one occasion but no response has been received.

It is not our intention to dwell on past mistakes but we should learn from them. We now want to move forward on Transforming Vauxhall in a positive way and would therefore be grateful if you could confirm

- (1) How KOVF can assist in tapping into community expertise in preparing the next round of consultation materials; and
- (2) How we can further explore the suggested improvements.

I look forward to receiving the report on the consultation results, and how TfL plans to respond to them, in February.

Yours sincerely,

Helen Monger  
Chair

## Appendix 1: KOVF PROPOSAL AND SUMMARY OF BENEFITS

### Vauxhall District Centre and Gyrotory An alternative solution for Vauxhall?



The suggested improvements as presented at our last public meeting include:

- South Lambeth Road section of gyratory closed to through traffic  
*(Space converted to a 'shared use' public piazza linking Vauxhall Park and Vauxhall Gardens)*
- Two way working through out including Kennington Lane/Harleyford Rd/Durham St)  
*(This reduces traffic flow along Durham St to point where shared use can be considered)*
- South Lambeth Place converted to an indoor market  
*(30 to 60 additional new jobs)*

## Appendix 2: Relevant planning policies

### Saved Policy 12 UDP Strategic Transport Hubs and Transport Development Areas

The design of the stations/interchanges should have the highest standards of interchange between modes and have a visual impact and setting appropriate for a building, which should be a community focal point and landmark. Each of these strategic hubs should include:

- Well-designed spaces for stops and shelters;
- Sufficient kerb space for buses;
- Simplified walk routes to access the networks;
- Good pedestrian crossings; and
- Be fully accessible to all;

### Draft Lambeth Local Plan POLICY T4 Public transport infrastructure

(a) Lambeth will seek better connectivity, quality and capacity in public transport including:

- (i) the Northern Line extension from Kennington to Battersea Power Station with an intermediate station at Nine Elms;
  - (ii) improvements to the capacity at Waterloo station and Vauxhall rail and underground stations;
  - (iii) improved interchanges and east-west orbital links;
  - (iv) an increase in the quality and frequency of train services to Lambeth stations;
  - (v) improvements to bus services and new services to the Vauxhall Nine Elms Battersea Opportunity Area;
  - (vi) improvements to facilities and access at railway and underground stations;
  - (vii) new station stops on the Overground at Brixton and Loughborough Junction as part of improved rail interchanges;
  - (viii) platform lengthening at Clapham High Street and Wandsworth Road to permit Victoria trains to call at these stations;
  - (ix) at least one underground station in Clapham to be made accessible;
  - (x) extension of the Croydon Tramlink to Crystal Palace and Streatham;
  - (xi) an appropriate replacement for the former Cross River Tram that will deliver the same regeneration benefits and relief to congestion on the Northern line;
  - (xii) other opportunities for extensions to the underground and tram network.
- (b) Lambeth will work in partnership with Transport for London, Network Rail and other public transport providers to bring forward improvements to public transport infrastructure and services in the borough, including the strategic interchanges at Waterloo, Vauxhall and Brixton, and provision for buses and coaches.
- (c) Change of use of existing land used for transport or support functions will not be permitted unless there is no current or future strategic or operational need, or alternative facilities are provided that enable existing transport operations to be maintained.
- (d) Development proposals will be expected to provide, or contribute to the provision of new and/or improved public transport infrastructure where the predicted number of additional trips will lead to a cumulative increase in use.



- (e) Proposals to improve or provide new public transport infrastructure and interchange facilities, including railway, underground and bus stations and bus stands will be supported subject to:
- (i) being acceptable in terms of impact on the environment including townscape, public realm and amenity of adjoining areas; and
  - (ii) being designed to be safe, convenient, attractive and accessible for use especially by disabled people, children and cyclists, including provision for cycle parking and consideration of desire lines.”