

**Martin Stanley**



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[consultations@tfl.gov.uk](mailto:consultations@tfl.gov.uk)

Dear Sirs

**VAUXHALL CROSS CONSULTATION**

This is a response to the current "Have your say ... on transforming Vauxhall Cross" consultation exercise.

I oppose, and strongly urge TfL not to press on with, Tfl's proposed 'transformational changes' until

a) Tfl has properly assessed - and openly consulted on - the consequences for pedestrian and cyclist safety, for traffic in surrounding streets, and for the environment,

and

b) Tfl has carried out a detailed, open and interactive comparison of Tfl's and alternative proposals, including the *Our Vauxhall* traffic management scheme and other schemes that would allow the retention of something more like the current bus station.

By way of background, I am aware that Tfl were originally strongly opposed to anything like the current proposals and were concerned that converting the roads to two-way traffic would likely introduce delay and junction complexity that would severely delay traffic on the Inner Ring Road/Congestion Charge boundary. The only way, it seemed, that the road traffic could be accommodated would be if Kennington Lane were widened under the railway, but this would cost c.£50m and be very disruptive to railway traffic whilst being built. Local councillors fought for three years before Tfl changed its mind, and senior London Borough of Lambeth (LBL) and Tfl officials could not explain why this had happened, commenting only that the decision had been taken 'above their pay grade'. Tfl have never, to my knowledge, provided any further explanation other than mention the existence of a general policy imperative to get rid of gyratories - a policy that has never, as far as I am aware, been the subject of any form of consultation.

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LBL have separately consulted the community and gained general approval of the creation of a district or town centre and the 'the removal of the gyratory'. However, those responding to that consultation no doubt had in mind a reconfiguration along the lines of that proposed by *Our Vauxhall* and its predecessors, allowing pleasant and easy access from the south of Vauxhall Cross to the stations. Whether or not this is feasible, they are unlikely to have imagined a proposal along the lines of the current TfL scheme, for reasons set out further below.

## **Pedestrian and Cyclist Safety**

Those supporting 'the removal of the gyratory' clearly anticipated prioritisation of pedestrian and cycle traffic over vehicles. Indeed, the consultation documentation stresses up front that the scheme's purpose is to "*significantly improve pedestrian and cyclist provision to help create a safer and less intimidating environment for vulnerable road users. The proposed changes would also help to improve connectivity throughout the area, and create a better environment for people living, working, and travelling through Vauxhall.*"

The consultation does not, however, appear to recognise that the southerly approach to Vauxhall Cross is currently unpleasant because it can take a long time to cross the traffic streams, and that the routing for cyclists is slow and in some ways circuitous. It appears, however, that pedestrians and cyclists may face longer delays if TfL's proposals are implemented - see further below.

I do not know whether TfL has carried out a detailed analysis of the location and reasons for recent accidents around Vauxhall Cross. I do know that no such analysis accompanies the current consultation documentation. And I strongly suspect that most accidents have occurred because those injured have not waited for 'green men' and/or have chosen to cycle amongst the traffic rather than on the separate cycle tracks. Lambeth cyclists have made the same point in response to other consultations. It would thus appear dangerous to make any changes that would increase pedestrian crossing times, or lengthen the time taken to travel across Vauxhall Cross on cycle tracks. Indeed, I understand that traffic management professionals believe that traffic light delays should wherever possible be limited to 40 seconds, or else risky behaviour increases to unacceptable levels. (See Annex A.)

I am concerned, therefore, that the proposals involve '*increasing some journey times for cyclists*', and that '*there will be an increase in the average wait time*' at certain pedestrian crossings. The *data table* appears to show that these problems particularly apply to those entering Vauxhall Cross from South Lambeth Road/Vauxhall Park and/or those continuing their journey next to the MI6 Building, either across Vauxhall Bridge or along the Albert Embankment. This is presumably in part because cyclists would no longer be able to follow the direct route through South Lambeth Place but will instead be diverted via Miles Street

I also note that the detailed data includes *average* and not *maximum* times, and that the former are based on fixed signal timings. However '*if the scheme were built it would utilise SCOOT technology [which would] optimise traffic light timings to reduce delays*'. (I assume that SCOOT aims to reduce delays to road traffic by increasing the delays experienced by pedestrians and cyclists.)

I accordingly urge TfL to reconsult on this issue in particular, describing the impact on crossing and transit times in more detail, and explaining why TfL believe that the accident rate will decrease.

### **Key Assumptions, Traffic Modelling, *Our Vauxhall* and the Bus Station**

Looking at the proposals more widely, it is important to remember that the Vauxhall/Nine Elms area will become home to around 30,000 new residents living in c.18,000 new homes. There will also be many new businesses including hotels. But TfL has not divulged the assumptions underlying their traffic forecasts which in turn underlie their modeling of the traffic around Vauxhall Cross, especially traffic entering the area from Vauxhall Bridge, Nine Elms Lane, Wandsworth Road and South Lambeth Road - particularly in the morning and evening peaks. A particularly critical assumption is the nature of the occupants of the new homes. Both the weekday occupancy rate and the traffic forecasts will no doubt vary greatly according to the income, family circumstances and main residences of the owners of the new properties. Wealthy foreigners are more likely to use cars or taxis than use the Northern Line extension.

TfL have also not divulged their current estimate of the cost of the scheme, nor how long it would take to build. These are important questions, bearing in mind (a) the already high cost of public transport in London, and (b) that the creation of the current gyratory took approaching three years, and the smaller scale works at Stockwell are taking around a year.

And TfL has not fully and clearly explained why they prefer their scheme to other, apparently more pedestrian/cycle friendly schemes such as that being promoted by *Our Vauxhall*. Given LBL's, and now TfL's, apparent bias in favour of the dual carriageway solution, it is not reasonable to ask the public to take their modelling on trust. There needs to be full disclosure of the inputs, assumptions and methodologies that are relied upon by TfL, and there has to be an open-minded and consultative examination of *Our Vauxhall* and variants.

TfL have also never clearly explained why the reconfiguration of the gyratory needs to be accompanied by the destruction of the current bus station and its replacement by bus stops, some of them on the main roads. It may be that this is necessary in order to allow TfL to generate cash from commercial development of part of the site. It might be reasonable for TfL to take this benefit into account when assessing the competing options but, if they do, they should do so transparently.

## Rat-Running

This photo is of unclassified, residential Fentiman Road at 0710 one typical morning in 2014. The traffic is in 2016 often even heavier than this following the introduction of CS5 and the associated road narrowing and prohibition of left turns from the northbound Clapham Road at the Oval.



It is therefore of considerable concern that LBL and TfL recognise that their proposals might lead to '*a significant increase in traffic flows*' in roads around Vauxhall Cross and that they would accordingly if necessary '*consider mitigating measures*'. The consultation documentation does not, however, give any hint as to what these measure might be, and it appears likely that any effective measures would be inconvenient for local residents, several of such measures having been rejected previously.

These issues need to be examined and discussed with local residents before any decision is taken to proceed with any reconfiguration of Vauxhall Cross.

## Environmental and Other Issues

- I note that the supposed environmental benefits of the proposals loom large in TfL's thinking.
- I am also aware that pollution levels in Vauxhall Cross are of serious concern and significantly exceed legal limits.
- There is also some concern that buses that terminate at Vauxhall would no longer park in Bondway but would instead park in the South Lambeth Place tunnel, thus exposing pedestrians using this main route to the stations to diesel fumes in a more confined space.

I was therefore very surprised to find that there is no Environmental Impact Assessment accompanying the recently published documentation. It seems to me that this must be published - or a reason for its non-publication be given - and debated before any decision is taken on any reconfiguration of Vauxhall Cross.

Equally, I can see no discussion of the impact of the removal of the bus station on the disabled, partially sighted etc. This too surely needs to be published before any reconfiguration decision is taken.

### **The Consultation Process**

Finally, and bearing in mind the chequered history of the project mentioned at the beginning of this letter, I draw attention to my submission in response to the end-2014 consultation on the future of Vauxhall Cross, attached at **Annex B**. This is because I want to stress that the message at the heart of this letter is not new but was put to TfL over a year ago. Note in particular my opening comment that *'Improvements for pedestrians and cyclists, as well as for those using the bus station and other elements of the transport interchange, would of course be very welcome. But the lack of detail in the current plans means that it is quite impossible to answer almost all of the questions posed in the supposed consultation.'*

TfL's formal response to this and many other thoughtful comments, was that

- *Analysis ... indicates that there are a range of issues relating to elements of the scheme. Some respondents wanted more detailed information in order to comment fully on proposals, giving us a good indication of the information required for the next stage of more detailed consultation.*
- *TfL and the London Borough of Lambeth will now use the outcomes of this consultation to inform the development of detailed proposals for further consultation later in 2015. TfL and Lambeth are committed to engaging with key stakeholders during this next stage of project development to address issues raised and help shape the developing proposals.*

But these were empty words. TfL have not recognised that respondents need detailed information if they are comment intelligently on its plans. I and others have since raised these issues at LBL's and TfL's consultation exhibitions but the staff at those exhibitions have not been able to answer any of the questions implicit in my previous submission and this letter. Answers are also not to be found in the current consultation material.

TfL should not use the consultation process merely to tweak its latest plans. The authority has a clear duty to consult with an open mind on the merits and demerits of such a large project. This means that full and detailed information needs to be made available to consultees. This has not yet happened in the case of Vauxhall Cross, and this failure can only be remedied through embarking on further high quality consultation. A decision not to do this will represent a clear failure of proper process.

Yours faithfully

MARTIN STANLEY

## **Pedestrian Crossing Times**

It appears that there is a consensus, in the academic and railway/traffic management communities, that drivers and pedestrians should if possible not be asked to wait for more than around 30-40 seconds before being given permission to proceed at a controlled crossing. Longer crossing times encourage risky behaviour that inevitably increases accident rates. Three references are quoted below (emphases added).

### **1. Fox River Crossing Accident in 1995 in which seven children were killed - extract from official USA report:**

*The FHWA-funded February 1991 report by the University of Tennessee found that both extremely short and excessively long warning times are dangerous. **Warning times in excess of 30 to 40 seconds were found to cause many motorists to engage in risky crossing behavior.***

### **2. Level crossing accident in 2013 in which two children were killed - extract from the UK Rail Accident Investigations Branch Report 01/2014**

*Such long periods of closure are likely to make users intolerant. Research in North America has shown that the number of pedestrians crossing roads against traffic signals increases significantly if waiting time is longer than 40 seconds. A previous study in Europe found that **38% of pedestrians cross on red if waiting time is 40-60 seconds, and only 18% cross on red if waiting time is shorter than 30 seconds.** In the UK, RSSB is currently sponsoring research into pedestrian behaviour at level crossings, and this is one of the aspects that is included in the study.*

### **3. Level crossing accident in 2013 in which a motorist was killed - extract from UK Rail Accident Investigations Branch Report 04/2014**

*Review of European and North American Practice of Pedestrian Signal Timing', K G Baass (1989)*

- *An American study found that the number of pedestrians crossing illegally increased significantly if the waiting time at a red light was longer than 40 seconds.*
- *A German study found that 38% of pedestrians would cross on a red light if the waiting time was 40-60 seconds, but only 18% would cross on red if it was shorter than 30 seconds.*

*It should be remembered that, in both the USA and Germany, pedestrians are required by law to observe red lights. Whilst this is different to UK law for pedestrians, these findings may be illustrative when considering possible impatience on the part of motorists waiting at level crossings.*

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Dear Sirs

This is a response to the current “Have your say ... On transforming Vauxhall Cross” exercise.

Improvements for pedestrians and cyclists, as well as for those using the bus station and other elements of the transport interchange, would of course be very welcome. But the lack of detail in the current plans means that it is quite impossible to answer almost all of the questions posed in the supposed consultation.

### Traffic

For instance, TfL staff have confirmed that all the additional traffic generated by the Nine Elms developments, the proposed two way working, and in particular the new more complex junctions at the foot of Vauxhall Bridge, at the west end of Kennington Lane and at the south end of Durham Street, will significantly slow road traffic throughout the area. But they do not have (or at least are as yet unwilling to share) their estimates of the extent of the additional delays, the consequences for traffic in the surrounding area, or for pollution levels around these junctions.

It is particularly notable that east- and south-bound traffic – which currently uses five lanes under the railway – will in future be confined to two lanes followed by a complex four way junction at the west end of Kennington Lane. This junction will also be shared with cyclists on CS5 and cyclists turning to go down South Lambeth Road. It is far from clear to anyone who has attended your three events, including your staff, how this can possibly work without causing serious congestion through the rush hours and most likely beyond.

### Pedestrians

The present plans also seem to make matters worse for many pedestrians. For instance, it will now be necessary for anyone walking from Vauxhall Park/Langley Lane to cross a dual carriageway rather than – as now – one wide road. This would be OK if the current single pedestrian crossing were to be retained, but it seems that there is to be a staggered crossing – so delaying pedestrians who will need to wait right in the middle of two busy two-lane roads. Much the same applies to the crossing at the north end of what is now the bus/tube station complex.

### Cyclists

Turning to cyclists, the current problem is that many cyclists do not use the cycle lanes on the pavements because this routing is slightly slower than cycling on the road and taking the risk of conflict with motor vehicles. But at least there is a short-cut along South Lambeth Place and through the bus station which many of us use. In future, however - and apart from the CS5 improvements - it does not look as though the cycle lanes will offer any faster routes than at present, and the cut through South Lambeth Place will be closed off. It is hard to see how this new layout is an improvement on the current - admittedly inadequate - one.

### Bus Passengers

The likely experience of bus passengers is particularly unclear. TfL staff have been unable to confirm that all passengers will be able to change buses without crossing roads, and they have been unable to confirm that all Victoria-bound buses, for instance, will continue to share the same bus stop. The same issue arises in the case of buses bound for Stockwell and Parliament Square, to take two further examples.

### Town Centre

Last, but certainly not least, your staff have so far been unable to explain why the proposed 'real centre for Vauxhall' - which sounds grand!- will be facilitated by the new road etc. layout. Traffic will still dominate Vauxhall Cross, and the new centre will be surrounded by four very busy dual-carriageways. 'Removing the Gryatory' would be wonderful if the result was that one of its four limbs were then closed to traffic, thus genuinely transforming the cyclist and pedestrian experience. But I have yet to find anyone, including TfL staff, who can explain how the proposed new road system will overcome any of the current unattractive features of the current layout.

All in all, therefore, I strongly urge you not to base any future decision-making on the results of this current exercise, but to engage much more closely with those that know the area well, and then bring forward detailed plans that then can be the subject of professional, well-informed consultation.

Martin Stanley

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