



Oliver Burtill
Transport for London
197 Blackfriars Road
Southwark
London
SE1 8NJ

14 December 2014

Dear Oliver

Re: CS5 consultation on Harleyford Road

Further to our earlier correspondence, I would like to raise a number of points, many of which were brought out at our Public Meeting you so kindly attended.

As you are aware, the Kennington, Oval and Vauxhall Forum (KOV) is a volunteer organization supported by a small grant from Lambeth Council. It has several objectives including Neighbourhood Planning and helping to deliver local consultation by using local networks (whether Friends of Parks, Libraries, Residents and Tenants Associations etc.) to increase the reach and deliver rounded feedback. We have accumulated a database of some 500 email addresses. 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.

This letter has been prepared with the input of a number of people and local groups we represent and has been possible as a result of significant work by many in the area thinking through the consequences of the proposals.

We acknowledge that TfL has done a lot to improve the scheme since the original consultation. However, having listened to the feedback of our members and others locally, KOV does not support the current approach to CS5 along Harleyford Road for the following reasons:

- **Increased journey times for all road users (except cyclists) and pedestrians too.**

In particular, an adverse impact on thousands of bus users heading from Oval towards Vauxhall and beyond. The section of road from the Oval to Vauxhall (Harleyford Street/Kennington Oval/Harleyford Road) has a bus lane servicing bus numbers 185, 36 and 436. At peak times, 21 buses per hour take advantage of the bus lane – say up to 2,000 passengers per hour. The current CS5 proposal will effectively make the 21 buses per hour heading for Vauxhall join a stream of relatively slow moving traffic. Not only would the buses be significantly slowed so too would other traffic.

- **Increased CO2 emissions and reduced air quality resulting from the traffic sitting idle for longer periods of time.**

Stationary traffic, e.g. cars with engines idling at lights, contribute approximately 1.2g per minute CO2. The removal of the bus lane will result in increased congestion and delays on most journeys thus increasing carbon emissions.

- **Adverse economic impact**

TfL has a responsibility to deliver the most efficient and effective usage of the roads under its jurisdiction to allow the safest and most economic travel for all. With the use of additional fuel consumption as a result of vehicles going longer distances and sitting idle as well as loss of time for everyone other than cyclists, this is not an efficient solution for the London economy.

- **Increased risk of accidents and congestion on other local roads**

Rat-runs are likely to increase, particularly Fentiman Road, for cars trying to avoid Harleyford Road.

- **Severe problems outside the Royal Vauxhall Tavern (RVT)**

In this latest design, we recognise that TfL has made efforts to mitigate the risk of conflict between pedestrians and cyclists at the RVT junction but the design still falls short of what is needed. For example, cyclists wishing to stay on the left hand side of Vauxhall Bridge will continue to cut through the pedestrian tunnel on the station side. Had CS5 continued on the other side of the road under the viaduct before crossing over, more cyclists would have the option to avoid the pedestrian tunnel. A further limitation of the design is the one-way routes on the CS5 around the viaduct. These do not reflect how cyclists will behave and are at odds with proposed two way working. We would expect the majority of cyclists currently going under the viaduct to turn right into South Lambeth Road. Only a minority will use the pedestrian tunnel on the RVT side.

It is a feature of CS5 that cyclists will be able to reach relatively high speed along the Harleyford Road stretch of the superhighway heading towards the RVT junction. In spite of the mitigation measures, we would expect cyclist/pedestrian collisions to be inevitable. At best, it will create severe conflicts. We believe that the design can be improved significantly by taking into account some of the ideas put forward by the community. A more modest cycle lane provision that does not encourage high speed cycling would help.

Furthermore, the consultation has highlighted some severe inconsistencies:

1. **CS5 does not address the concerns of most local cyclists when approaching the Vauxhall Gyratory.**

A majority of cyclists use the gyratory as an interchange with South Lambeth Road rather than Harleyford Street. My fellow KOV Board Member, Michael Keane was kind enough to run a brief survey on Friday 12th December to record travel and his results are appended to this letter showing the need for a better link between the Gyratory and South Lambeth Road. This evidence is further supported, in that sadly, the most recent cyclist deaths, related to problems with South Lambeth Road where it meets the Gyratory at Parry Street.

2. CS5 is being introduced out of sequence with other changes proposed to the Vauxhall Gyratory

The current proposal does not take adequate account of the proposals to reverse the mini Gyratory suggested as part of the 'Transforming Vauxhall' consultation. If the proposals for the Gyratory were implemented, the CS5 suggestion to relocate a bus stop to Durham Street becomes problematic, and the investment in a floating bus stop no longer makes sense on Harleyford Road.

3. Inadequacies of the consultation process

As a forum, we naturally take consultation very seriously. We are concerned to note that our area seems to be given less choice than other local consultations and insufficient evidence to justify the benefits or otherwise of the proposal. Key differences between the CS5 consultation and others we know of is explained here:

- TfL's consultation for Stockwell Cross helpfully provides additional information on the traffic impacts that the scheme might have – when the hyperlink is viewed it shows pedestrians crossing the area, bus journey times and car journey times at peak flow in the morning and the evening. Yet this data is not supplied by TfL to show the likely impacts of CS5.
- During the earlier consultation on CS5, residents of Belgravia were given a choice of routes to consider. The residents in Oval have not been given a choice – other than which side of Harleyford Road it could travel.

4. An alternative route proposed by residents merits further consideration and consultation

As you are aware the residents of Harleyford Road have prepared an extensive critique of the CS5 proposals and the disadvantage it puts on local residents, particularly the restriction on receiving deliveries or any other emergency needs. The residents have also outlined their concerns over HGV transport at the interchange with Durham Street as a result of reduced road widths.

Additionally, the residents of Ashmole Estate have made representations about the spacing of bus stops and the removal of one on Harleyford Road and placing it on Durham Street. For the elderly and infirm coming from the Estate every pace makes a significant difference to their travel time.

There is an alternative proposal to put the Cycle Superhighway around the back of Kennington Oval and through Vauxhall Street, which is a very quiet road where there is already a segregated cycle lane, and onto Kennington Lane. Although not suggested by residents, there is the potential then to allow the cycle lane to run along the edge of Vauxhall Pleasure Gardens towards the river (behind the RVT). This proposal merits serious further consideration if CS5 must be delivered.

Additionally, KOV as you are aware has produced a proposal for the Vauxhall Gyratory which was presented at our meeting on 9th December. This proposes closing off South Lambeth Road to through traffic. This road closure would make this a much safer route for the majority of cycle journeys.

We welcome better provision for cyclists in our area and trust you will consider these alternatives as a more cost-effective and improved offer.

Yours sincerely,

Helen Monger
Chair

c/o 63 Harleyford Road
London SE11 5AX

Mobile: 07788661179

Appendix 1: Cycle Survey Analysis

CYCLE SURVEY AT RVT 4:50PM to 5:15PM 12 DECEMBER 2014		
TOTAL PEDAL CYCLES (n=)	114	
<u>Pedestrian/cyclist tunnel</u>	31	27%
<i>of which</i>		
<i>Straight down Kennington Lane</i>	16	14%
<i>Right onto South Lambeth Road via crossing</i>	15	13%
<u>Kennington Lane viaduct crossing</u>	83	73%
<i>of which</i>		
<i>Straight down Kennington Lane</i>	40	35%
<i>Right onto South Lambeth Road</i>	43	38%
CYCLE SURVEY AT EAGLE 5:20PM to 5:30PM 12 DECEMBER 2014		
TOTAL PEDAL CYCLES (n=)	21	
<u>Kennington Lane</u>	21	
<i>of which</i>		
<i>Straight down Kennington Lane</i>	4	19%
<i>Right onto Durham Street</i>	17	81%