

12 June 2020

Response by One Dulwich to Appendix 3, COVID-19 Post-Lockdown Highway Schemes (CPHS)

Introduction

One Dulwich is a large and growing group of residents in what Southwark Council has called Area B in the 'Our Healthy Streets' (OHSD) consultation. Since it was formed just over two months ago, it has expanded to include residents in Area C, including Dulwich Village itself.

As a group, we support the overall objectives of the COVID-19 Post-Lockdown Highway Scheme (CPHS), and Our Healthy Streets Dulwich (OHSD), to reduce traffic and make active travel (cycling and walking) easier and safer. But critically and consistent with OHSD, we also consider that emergency measures aimed at stopping through traffic and enabling social distancing should not penalise residents.

The catalyst for forming One Dulwich came from concerns about the extent to which the radical proposals put forward in Phase 3 of the OHSD consultation to close Dulwich Village junction to all traffic, now proposed in CPHS, had been driven by a very small number of online respondents to Phase 2. Only 217 people responded to the Phase 2 online survey, a proportion of whom we expect (but without a breakdown of demographics, which Southwark hasn't supplied, cannot definitively confirm) were from lobby groups rather than residents. Of the 217, only 122 supported road closures.

We are concerned that other statistics used throughout the Phase 3 public meetings were misleading, notably that there had been a 47% increase in traffic through Dulwich Village junction (the low baseline figure taken from September 2017 when the junction works resulted in long tailbacks and traffic taking alternative routes). We believe this particular statistic, by suggesting a sudden, alarming and unexplained increase in traffic, will have influenced the way that people responded to the consultation and the online survey.

We are also very concerned about the effect of the Dulwich Village junction closure on our local shops in Dulwich Village and Calton Avenue: as a vibrant part of our community, they are already struggling to cope in the Covid-19 crisis.

We note that the CPHS proposal for Dulwich Village will be experimental and temporary, made under powers contained within the Road Traffic Regulation Act (RTRA) 1984 (as amended) and subject to objections. But we understand that the OHSD proposals are only being delayed by the Covid-19 crisis, not terminated, so our activity continues. In OHSD discussions with our councillors (which are equally relevant to CPHS), we have raised the importance of connectivity: Dulwich Village junction marks the centre point of our community and lies on the only direct route between East and West Dulwich. We have also emphasised the need for the effect of any interventions to be monitored (in terms of traffic, air quality and equality considerations) on all local roads.

But above all, we have stressed that timed restrictions (stopping through traffic at universally recognised peak times), as opposed to permanent closures 24/7, would be a more proportionate response and would create far wider support from residents.

As the Walking and Cycling Commissioner has said: "Filters allow people to access their homes, allow cab drop offs, allow emergency service access. But they stop rat running through residential areas, making it safer for everyone."

One Dulwich objections to Appendix 3 and Appendix 3a Dulwich Village

In advance of the experimental order being approved and issued by Cllr Livingstone, we raise here our concerns about the basis for this proposal and the way in which it will be implemented. There are a number of areas where the stated reasons and benefits do not conform to the policy requirements. The procedures for making an experimental traffic order are defined by national regulations which include the consideration of any arising objections.

An initial point, since it is not immediately obvious without looking at the detailed drawings in Appendix 3a, is that the report when describing “a prohibition of motor vehicles on Calton Avenue, between Dulwich Village and Court Lane” in fact means also a prohibition of motor vehicles on Court Lane. This is not a mere detail, because it would result in a complete block 24/7 at the junction for access or egress to and from ‘Area B’ by residents using motor vehicles, when the problem to be addressed is recognised by all (including the Council) as a time-limited one during peak hours only.

1. No evidence of support for closing the Dulwich Village junction

In Background/Request, it states that “the council has been working with residents in the Dulwich area on measures to discourage residential streets from being used as a cut-through by motor traffic” and that “feedback received shows there is support for measures to....discourage through traffic on residential streets”.

In other Appendices, such as the Report for Melbourne Grove, there is a section called Feedback from Stakeholders, which says “Recent engagement from OHS Dulwich scheme shows around 70% of respondents are in favour of this closure”. There is no such section in the Appendix 3 Report and no reference to levels of support from this recent engagement in relation to the proposed Dulwich Village junction closure from affected residents. The absence of residents-only data is most likely due to a lack of support among residents for these measures.

Feedback from primary stakeholders was sent to councillors and council officers earlier this year in the form of aggregated results from surveys conducted by six residents’ associations (including Court Lane RA). This aggregation showed that, of the more than 200 respondents, 71% do not want the Dulwich Village/Calton Avenue/Court Lane junction to be closed.

An alternative proposal, which has growing support, asks for there to be timed restrictions for through traffic at this junction, not permeable closure, so that residents can access their homes and receive the regular emergency, security and service provisions that they receive presently. Timed restrictions on through traffic while permitting residents access to their homes is a tool recognised by both the Healthy Streets initiative and TfL’s ‘Liveable Neighbourhoods’. The cost of signage for timed restrictions would be substantially less than the £45,000 allocated for this experiment.

2. No evidence to support numbers of pupils crossing Calton Avenue/Court Lane

The Background/Request refers to a high concentration of pupils and shows a photograph of pupils in Dulwich Village north, not Calton Avenue or Court Lane. The figure of 3,500 to 4,000 pupils at peak hours is not substantiated.

There are no schools in Calton Avenue or Court Lane. If every child from Dulwich Village Infants and Dulwich Hamlet crossed this junction during peak hours, which they do not, it would be 531

children. If every child from Alleyn's in Townley Road crossed this junction, which clearly they don't as many are bussed in, it would be around 1,200. So this number is erroneous as has been pointed out to the Report's author.

If the objective is to improve the safety of pupils, it would be more logical to introduce a prohibition of motor traffic in Dulwich Village north, where the photograph of pupils was taken and where there are two schools buildings, Dulwich Village Infants Lake Building and Frances Building on opposite sides of the road (the photo shows children on their way from one building to the other at lunchtime). This is borne out by Southwark Council's pedestrian counts at Dulwich Village junction, which are highest on Dulwich Village North (between Dulwich Hamlet and the shops) – and in fact roughly double the pedestrian counts crossing Court Lane or Calton Avenue. In addition, the pavement outside the entrance of Dulwich Hamlet, because of the high pedestrian volume, should be widened.

3. Junction closure will divert and increase traffic onto roads with schools (Turney, Dulwich Village North) and increase traffic using residential streets as a cut-through

The Feedback from Councillors is that they are supportive of the plan to close the junction “but this must be accompanied by measures to stop traffic diverting down Turney Road and Burbage Road, and to stop traffic being diverted onto Dulwich northbound and southbound”.

Traffic being diverted onto these roads would be an inevitable consequence of closure of the Dulwich Village/Calton Avenue/Court Lane junction, yet it is only proposed that these “additional measures on Dulwich Village and Townley Road” (no mention of Turney or Burbage Roads) are considered as a separate ‘Phase 2’ measure, to be implemented at an unspecified later date. This means the safety of children in these roads will be made worse, not better, by the closure of Dulwich Village junction.

This goes against paragraph 20 of the Community Impact statement, which says that the recommendations will improve road safety, particularly for vulnerable road users, on the public highway. In fact, road safety will be worsened for children crossing Dulwich Village north.

Figures from Southwark Council's O&D Survey November 2018 (traffic currently entering and exiting Calton Avenue and Court Lane) support this. Even taking into account the 11% evaporation estimated by Southwark, more than 500 vehicles during the morning peak are likely to be diverted along East Dulwich Grove and the northern end of Dulwich Village, passing Dulwich Hamlet, Dulwich Village Infants School, JAPS and JAGS, increasing both pollution and congestion.

Furthermore, traffic entering Calton Avenue from Townley Road or Court Lane from Lordship Lane will inevitably divert into Eynella, Eastlands Crescent, Dovercourt, Druce, Desenfans, Dekker and Woodwarde Roads, causing an increase in the traffic that uses these residential streets as a cut-through, instead of a decrease which the proposal says is its aim.

4. A lower cost, more popular solution is available

We note that the cost of signposts and physical measures to prevent motorised access is £45,000. The proposal we have put forward and which commands widespread support in Area B, for restricted timed access, not road closures, would inevitably be less expensive as it involves

signage only. This proposal would meet the stated objectives of this Report, that is, discouraging through traffic on residential streets, but allow access for residents.

5. Disproportionately adverse impact on elderly and less able residents

The Community Impact Statement governing this proposal states, in Paragraph 19, that ‘The proposals have no disproportionate impact on any particular age, disability, faith or religion and ethnicity and sexual orientation’. We are aware of concerns expressed by elderly and less able residents in East Dulwich (Area B in the OHSD scheme) who are dependent on their cars, in the absence of public transport, for e.g. getting to and from West Dulwich to attend their doctors’ surgery. Closing Dulwich Village junction would block the only road that connects East Dulwich and West Dulwich between North Dulwich and the South Circular, and closing it would have a disproportionate impact on their ability to access health services.

6. Adverse impact on access for emergency and refuse vehicles

The Community Impact Statement also states, in paragraph 20, that ‘the recommendations support the council’s equalities and human rights policies and promote social inclusion by providing improved access for key services such as emergency and refuse vehicles’. The proposal clearly does not improve access but makes it more difficult to access roads in Area B, as the proposed physical measures to prevent motorised access do not allow emergency or refuse vehicles access.