Florence Eshalomi

[Sender address]

[Current Date]

MP for Vauxhall

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Dear Ms Eshalomi,

*\* If writing to your local councillor(s), follow this link: https://moderngov.lambeth.gov.uk/mgFindMember.aspx*

*Enter your postcode and you will find their details and the email address.*

**RE: Oval to Stockwell Triangle Low Traffic Neighbourhood**

I am writing to express my concerns regarding the recent implementation of the Oval Low Traffic Neighbourhood.

These include the following.

**Lack of notification or public consultation**

The Oval Traffic Low Traffic Neighbourhood (LTN) was implemented 1st June using a Temporary Traffic Order (TTO) under the Road Traffic Regulation Act 1984, section 6. Many residents both within the LTN and on its periphery did not receive notification of the scheme and others were notified by letter on the 22nd May.

Whilst the council was only legally obliged to provide 7 days notice and minimal consultation for the implementation of a TTO, inserting road closures in this way is undemocratic. Furthermore, as TTOs can be in place for a minimum of 6 months to a maximum of 18 months, this is an inappropriate way to test low traffic measures, particularly as the scheme negatively affects some residents.

The temporary road closures should be removed and a full public consultation should take place on implementation of any traffic reduction measures with the area.

**Increase traffic, pollution and noise in surrounding areas**

The installation of 5 bidirectional no-entry signs and planters and blocked all through roads between South Lambeth Road and Clapham roads, leaving only Landsdowne way as the only through-road. This LTN has negatively impacted many residents as traffic has been re-routed on to peripheral A roads (namely South Lambeth Road, Clapham Road, Harleyford Road, already under pressure from traffic and being a congestion charge boundary) and residential roads, causing increase noise and pollution. Many locals on small roads and estates within the LTN are also suffering as vehicles try to find ways around and through obstructions. The apparent aim of LTNs is to shift traffic from residential roads onto A roads but in inner London boroughs, people live, work and attend school along these roads so this is not a workable solution.

I live on.....and it has affected me by.....

**Safety**

A number of residents on commonplace have highlighted concerns over safety. Many of the small residential streets now seeing increased traffic, such a Palfrey Place, have little or no pavement and have children accessing the roads (nursery on Palfrey Place). The increased volume of heavy goods vehicles poses a danger to children. The increased volumes of traffic in other areas poses a risk for pedestrians, cyclists and emergency services (see below).

**Access Issues**

It is not been made clear whether the emergency services have been properly notified of the scheme. A number of times residents have witnessed emergency vehicles struggling access roads with in the triangle. In addition all three periphery A roads to the LTN are important routes for emergency services and increased congestion on these roads has a negative impact on journey times.

A number of residents who are disabled or have disabled relatives have also been negatively affected by the scheme and were also not consulted.

**Negative consequences of health effects on school children and others**

There are a large number of schools and nurseries along the boundary A roads affected by increased traffic. The nearest traffic monitoring device is located on Brixton road which has similar levels of congestion to boundary A roads of the LTN and has continuously high levels of nitrogen dioxide (LondonAir.org.uk).

In London pollution near busy roads it is up to 2-3 times higher than surrounding areas. Children are particularly at risk because pollution levels are known to be higher the closer you get to the ground. Exposure to traffic related air pollution have been shown to have a negative impact on lung development and results in increased morbidity in both children and adults with underlying lung conditions such as asthma. Even more concerning is that air pollution has a negative impact on neurodevelopment in children.

Although there a few small primary schools within the LTN, the vast majority are not and will be subjected to increased pollution. This represents health inequality. Planning and implementation of traffic reduction schemes should be democratic, fair and result in clean air for all.

**Conflict of interest and main beneficiaries of the scheme**

The major beneficiaries of this LTN are residents of Fentiman Road, Claylands Road and Richbourne Terrace (Average house price £2,000,000). The majority of these residents own cars and still have easy access to shops such as Sainsbury’s Nine Elms, whilst others are stuck in traffic for prolonged periods. Fentiman and Richbourne Terrace Residents Association ([www.ovalvauxhallresidents.co.uk](http://www.ovalvauxhallresidents.co.uk)) headed by Sally Warren have been pushing for changes for many years. Analysis of their publicly available meeting minutes demonstrates they have been working with Cllr Claire Holland for a number of years to bring in traffic changes to their own roads and that Claire Holland had Fentiman road downgraded from a B road to a residential street. B road are important as they support the delicate infrastructure of roads and are important to the network to keep vehicles moving. Instead, this road has now become, in effect, a cul-de-sac.

Cllr Holland, who is also Deputy Head of the Council, lives within LTN and directly benefits from the scheme but has failed to declare this as a conflict of interest (5. Land: Any beneficial interest in land which is within the Council’s area).

The Oval LTN benefits the few, at the expense of the many.

**Poor quality evidence to support LTNs**

*Concept of Traffic Evaporation*

To legitimise the Oval Triangle and other LTNs in the area she refers repeatedly to the concept of ‘Traffic Evaporation’, based on a 2002 article entitled ‘Disappearing Traffic? The Story so far’ and previous book (Cairn *et al*). This article states that when traffic flow is interrupted, traffic doesn’t build up in other areas, it ‘disappears’ due to changes in driver behaviour. Quite apart from the fact that the article is 18 years old, there have no subsequent studies by the authors or others in the UK. The evidence presented is weak. The article reviews global case studies where traffic flows have been disrupted but suffers from confirmation bias. It goes so far as to include both natural and man-made disasters as examples of traffic disturbance. One could argue that drivers are likely to avoid unstable infrastructure including surrounding streets following bridge collapses and earthquakes, so obviously traffic will reduce in those circumstances. There is also selection bias, as in order to substantiate their claims, the authors surveyed a ‘self-selecting group’ of Transport Officials. They also survey attendees of a Landor Publishing conference, the very same publisher who published their book and currently publish for pro-cycling lobby groups. The paper was commissioned by London Transport and one of the authors’ fails to disclose that they was working for them at the time of publication. The authors admit that every scheme to re-locate road space is different, so the effect of any plans will be dependent on individual circumstances. They also suggest any changes to roads to reduced traffic flow should be done in stages. This has obviously NOT been the case in Lambeth.

*Car Ownership*

Cllr Holland also quotes 2011 data suggesting that 70% of Lambeth residents do not own a car. More up to date data, as well as counting the numbers of cars on local council estates, suggests this is information is far from accurate. In addition, the beneficiaries of the scheme who live on Fentiman Road, Richbourne Terrace as well as Albert Square all own cars, so it appears to be one rule for them and another for residents in poorer areas both within the triangle and outside it. The concept that the working classes do not own motor vehicles it outdated.

*Route planning, pollution data and equality impact assessment*

No route planning was considered when designing this LTN. How can people living on Clapham Road now drive to Vauxhall Bridge? There is a no left turn at Oval onto Harleyford road. There is a no right turn onto South Lambeth Road. With no routes through the Oval Triangle, traffic is forced through a very small number of residential side streets (Prima Road, for example) in order to access one of the arterial roads.

There has been no consideration given to the impending changes in 2021 at Vauxhall Cross. Major work with a new road system and bus station being implemented will mean traffic in the area and surrounding areas will be even more gridlocked. Local roads need to be able to support the infrastructure to keep Lambeth moving.

There was no apparent analysis by the council in terms of equality impact assessment for the scheme and no evaluation of existing pollution and traffic data.

**Poor use of public money**

Lambeth has been awarded huge amounts of money by TfL for implementation of low traffic initiatives and the council make over £30,000,000 annually from traffic fines

**Using covid -19 emergency measures as a reason for rushed implementation**

Finally, this LTN was brought in under the guise of the covid-19 pandemic ‘using emergency funds’ to apparently help enable social distancing. There was no problem with social distancing within in the LTN, with Fentiman road and other roads being quiet residential streets where residents and others could easily pass at a safe 2 metre distance. Individuals in cars are very unlikely to spread covid-19 to cyclists and pedestrians and finally government data clearly shows that on 1st June when the Oval LTN measures were implemented that levels of circulating virus were extremely low (htpps://coronavirus.data.gov.uk/).

Yours Sincerely

[Name]