

Southwark Cyclists' response to Camberwell Grove Bridge consultation

30/10/2017

<https://consultations.southwark.gov.uk/environment-leisure/camberwell-grove-bridge/>

Southwark Cyclists believes the decision on Camberwell Grove is a litmus test for the approach in Southwark to deliver healthy streets. This is the [flagship policy the Mayor of London](#) announced this summer to significantly increase physically active travel and improve air quality, through reducing car trips by 3 million per day. A permanent closure is essential, both to encourage a wider range of people to cycle but also to start to bring about a reduction of motor traffic on residential streets across Peckham, Camberwell and Dulwich.

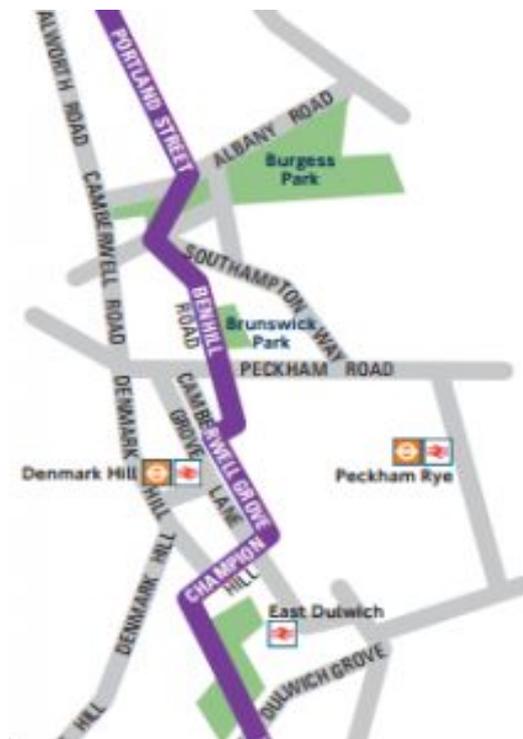
Our response covers the following issues:

1. Why continued closure of the bridge to motor vehicles is essential for a high quality, safe Quietway 7 - a route that encourages all ages and abilities to cycle
2. How other progressive London boroughs are balancing delivery of healthy streets with residents' concerns
3. The fundamental flaws of the consultation process and in particular the traffic data
4. Whether the reopening proposal is at all viable in the medium term
5. Our vision for Camberwell Grove as catalyst for a growing network of healthy streets

Because of the wider implications of this decision for public health, children and schools, equalities and business, we believe that the full Cabinet ought to take the decision whether to reopen the bridge or not.

Besides this response, Southwark Cyclists has published a [response to common issues raised](#), such as were contained in a leaflet distributed to most households in the area. Because the consultation materials were unclear and inadequate (as detailed below), a number of factual inaccuracies and misrepresentations have arisen, for example that Southwark Council is ignoring a legal duty to reopen the bridge. We are concerned these may have reduced public support for retaining the closure.

1. Continued closure essential for a successful Quietway 7



Southwark is currently investing £2m in cycle Quietway 7, which will run between Crystal Palace and Borough via Camberwell Grove, to encourage all abilities and ages to cycle. The nearest cycle route suitable for all ages to the west is Quietway 5, which is on the other side of Clapham. Closer to home in the last couple of years, a local resident and a NHS worker have lost their lives cycling on the Denmark Hill - Walworth Road corridor, tragic reminders of the consequences of failing to provide safe space for cycling.

Although cycling has continued to increase in Southwark, women, children, older people, those with BAME backgrounds and people with disabilities remain very underrepresented. That's why Southwark Cyclists was so delighted in 2015 to welcome the commitments made by Southwark Council in its award winning Southwark Cycling Strategy. In particular commitments to make cycling for everyone (principle 3) and for

Southwark to be the best cycling borough in London.

Before October 2016, Camberwell Grove suffered from heavy traffic flows, particularly during peak hours. It was simply not an inviting place to cycle for people with experience, let alone those who are particularly vulnerable, such as school children. Motor traffic flows were significantly above the requirements set in the London Cycling Design Standards (LCDS) as offering a suitable Cycling Level of Service (see chapters 2 & 4). Indeed the November 2016 decision to approve Quietway 7 highlighted the need for further motor traffic reduction along Camberwell Grove.

The unplanned closure since has transformed the street. There simply is no other practical way besides retaining it to make this Quietway a safe, high quality route. Denmark Hill is too heavily trafficked as an alternative link from the Green Dale path, while the width of Camberwell Grove precludes segregated facilities.

If the closure were to be removed, the problems would return from day one and the benefits of public investment in Quietway 7 would be severely limited by effectively a 'weakest link'. Coming around the time that major improvements on this route are about to be completed, the proposed timing of the bridge reopening could not be worse, negating the benefits of the major investment in the Quietway whether of funding or staff time. Crucially it would be the most vulnerable and those with the greatest health needs to incorporate physical activity into their daily lives, who would be most excluded from cycling along the new route.

2. How other progressive London boroughs have balanced delivery of healthy streets with residents' concerns

On 27 October 2017 [Hackney confirmed](#) it will be keeping trial road closures and even adding to them to improve a new cycle route, despite a small majority of local residents opposing them. It stated that while the 'closures have proved controversial...the Council feels that the closures have succeeded in reducing traffic on the cycle route and improving air quality and road safety near the schools'. While acknowledging the local concerns, Hackney believes that many of these can be reduced by mitigation and that there is no other practical way it can deliver on its public health and sustainable travel commitments, which respond to the needs of the majority of the borough.

This October, Camden is defending its experimental filtering of motor traffic around Tavistock Place at public inquiry. Camden believes the scheme's benefits in reducing motor traffic and air pollution while improving walking and cycling for all are worth standing up for against vocal opposition lobby. Its cabinet member for transport noted 'it was vitally important to focus on the equalities issues that were at the heart of creating liveable streets'.

Waltham Forest has undertaken the most ambitious set of measures as part of its 'Mini Holland' scheme. While residents were very much split in the consultation phases, the scheme has proved a major success and cut motor traffic overall. This October the scheme has taken the latest in a series of awards and a stream of visitors from the UK and beyond come to see the transformation of its streets and communities.

All these cases show again and again that delivering healthy streets is not easy. Local residents will have their concerns, not least where sudden changes to traffic flows in places they may have lived in for many years. These concerns will need to be listened to and responded to carefully. But if there is to be progress delivering a shift in the way we travel and improvements to the air we breath, indeed progress meeting legal duties, hard decisions cannot be dodged.

3. The fundamental flaws of the consultation process, in particular the traffic data

Southwark Cyclists are very concerned that the consultation materials presented the issue as simply between different groups of residents, when the decision has major strategic implications for cycling and through it how the borough tackles obesity, air quality and congestion, for which it has some of the worst indicators of any local authority in the country.

In order for the consultation process to be fair, consultees need to be able to provide informed comment to proposals. Southwark has legal duties that are very relevant to this consultation, such as:

- Public Health duties (Health & Social Care Act 2012)
- Public Sector Equality Duty (Equality Act 2010)

- Air Quality limit values (Air Quality Standards Regulations 2010)

The Southwark Cycling Strategy (2015) and Southwark Air Quality Strategy and Action Plan (2017) made important commitments to seek to respond to these duties by increasing cycling, yet no mention was made in the consultation materials of them.

While residents have had a chance to vent their feelings, informed comment was impossible in this consultation as the following information was absent:

a) Missing information about Southwark Spine consultation

Some of the greatest concerns about the bridge closure relate to displacement of motor traffic onto Bellenden and Lyndhurst Roads. Consultation on a traffic scheme, as part of plans for the Southwark Spine cycle route for these streets is understood to be imminent. The interplay of these proposals and the current consultation is clearly highly material, indeed previous communications from Southwark have highlighted the synergies.

b) Missing designation of Quietway 7

There was no information at all in the consultation materials to explain that Camberwell Grove forms part of Quietway 7 and Southwark policies regarding making cycling accessible to all. This is particularly concerning as this was the section of Quietway 7 for which there was no consultation previously. Consultees should have also been informed that the imminent completion of the Quietway could be expected to significantly increase cycling levels, as much as 50% in a year based on experience of Quietway 1.

c) Changes to weight and width restrictions if bridge reopens

The consultation materials fail to mention that the reopening would greater limits on motor vehicles than before the closure, rather than simply reopening as before. This could prevent as much as a fifth of motor traffic using the bridge, responsible for as much as a quarter of air pollution (adjusted LAEI 2013 figures).

d) Vehicle flow information

The consultation data suggests there have been significant changes - a 15% increase - but does not explain how this may have impacted on - or indeed arisen from - the bridge closure. It is therefore unclear how traffic changes on individual streets have been affected by changes in background flows versus being caused by traffic displacement.

Some residents have sought to suggest that the data provided is inaccurate, since traffic conditions during the survey weeks may not be representative. On investigation, no evidence of this was found and the Confidence Interval is very high given the sample size of about 200,000 vehicles over 5% of the period since the bridge was closed.

By contrast, we have serious doubts about the ability to make any informed conclusions about displacement from the consultation materials, since it appears to count pedal cycles and motor vehicles together. This was our conclusion having comparing Southwark data with open data from DfT (Table 1), which suggests that increases in cycling are largely responsible for the reported increase in traffic flows. For instance DfT counts on Rye Lane

provide a similar daily flow figure to Southwark’s count but clarify that 49% of the approximately 7,000 vehicles per day are pedal cycles (NB cycles are classed in law and by DfT statistics as vehicles). By contrast about 9% of vehicles on the Denmark Hill corridor are cycles: the large difference in traffic composition on different streets hinders generalisations.

DfT data for some major roads in the area suggest about a 15% increase in cycle flows in the last year compared to about a 1% increase in motor traffic. In particular the national data shows 36% higher cycling than forecast on Camberwell Church Street, a similar sized increase on Old Kent Road, but 2.5 times higher on Blackfriars Road. What seems to be happening is that very significant increases on new sections of cycle superhighway are leading to still significant increases in commuting cycling some distance away on the corridors leading to those upgraded routes.

Southwark count location	DfT : code & location if different location but same route	Southwark	DfT
Rye Lane (Peckham Rye station) - RA20	86015 - same	6298 (2016) 7423 (2017)	3555 pedal cycles (49%) 3739 motor vehicles Total: 7249 (2016)
Grove Vale (East Dulwich station) - RA13	57611: corner of Champion Park	19684 (2016) 19306 (2017)	1030 pc (9%) 11859 mv Total: 12889 NB estimate

Table 1: comparison of Southwark & [DfT traffic count data](#)

Without the traffic data broken down into transport modes, it is not possible to understand how much motor traffic flows have changed on individual streets. Nor is it possible to compare the changes in this area with the wider changes across inner London resulting from increased travel by Uber and internet deliveries. Nor is it possible to assess how cycle flows have been affected by a reduction in motor traffic on the Quietway. The deficiencies in the information provided fundamentally change all the assumptions and potential conclusions.

4. Whether the reopening proposal is at all viable in the medium term

Given the continuing structural weaknesses of the bridge, which are uneconomic to remove, the reopening option seeks to safeguard the bridge by significantly reducing the weight restriction from 7.5 to 3t, a non-standard limit. It is intended this would be made self-enforcing through narrowing the carriageway each side from 7'2 (2.18m) to 6'6 (1.98m).

The narrowing would prevent most vans from using the bridge and would slow most other vehicles to walking pace, increasing congestion and emissions. The risk of vehicles becoming stuck, particularly those turning from McNeil Road would increase significantly. But the biggest impact is likely to be an increase in weight carried by the bridge, as the reduced speeds reduce the gap between vehicles. In addition vehicle weights are increasing, as Electric Vehicles typically weigh 30% more. The combined effects of the [higher national vehicle weight limits](#) that came into force on 1 October to support alternative forms of propulsion and the T-charge that started on 23 October mean that typical vehicle weights are likely to increase. Drivers will seek to avoid daily emissions charges in central London and, from 2019, inside the south circular, by switching to heavier hybrid and Electric Vehicles.

No assessment appears to have been carried out of the serious likely impacts on the bridge if it was reopened of this greater loading. If reopened even just to cars and small vans, it is reasonably likely that the repairs will last considerably shorter than the nine years the previous repairs lasted, before emergency action is needed again.

5. Our vision for Camberwell Grove as catalyst for a growing network of healthy streets

Although it occurred by chance, the change to Camberwell Grove has had many benefits, including overall for local primary schools. That is not to say everywhere has benefitted but there is significant scope now to deliver further changes in a planned way to build on the success of the bridge closure.

School	Count location	Change in vehicles 2015-2017	5 day average daily vehicle flow 2017
Dog Kennel Hill Primary	Grove Hill Road	-29%	6427
Belham Primary	Bellenden Road (S)	+6%	11934
St John's & St Clement's Primary	Adys Road (N)	-17%	4021

Table 2: Traffic changes affecting primary schools in the local area (LB Southwark data)

NB though note caveat after table 1

Although Chadwick Road has seen the biggest increase in traffic, it is still one of the quieter residential streets in the area. The parallel Grove Hill Road still has 2.5 times more traffic, for example, even though it has a primary school on it: by contrast most of one side of Chadwick Road is an industrial estate. This appears to be an instance where some rebalancing of traffic flows between streets is justified. Mitigation measures are still needed: the speed cushions are not proving effective in discouraging excessive downhill speeds on Chadwick Road: installation of full width sinusoidal humps could help tackle this.

Bellenden Road suffered as a rat-run well before the bridge was closed. Width constraints in its central section mean the Southwark Spine cycle route will simply not be viable without filtering out private motor traffic, such as through a daytime bus and cycle gate. Action has been long awaited to tackle rat-running through this residential area, particularly on the Maxted - Bellenden Road corridor. Fortunately there are strong synergies to move forward now, with the opening of the Belham Primary School and commencement of the Peckham Rye station redevelopment both imminent.

The award winning Orford Road scheme in Waltham Forest provides a fantastic inspiration: a visit by local stakeholders should be organised to it. TfL has recognised the massive potential to increase walking and cycling in Peckham and Camberwell and could provide grants from its Liveable Neighbourhoods funding. This could also tackle the air pollution around Harris Academy, most of which comes from Peckham Road. Finally, through tackling rat-running on Camberwell Grove, proposals to improve conditions on Champion Hill could at last proceed.

The temporary arrangements over the railway bridge are confusing and obstruct visibility, they can bring different road users into conflict. The existing road markings are at the end of their life. We propose considering using the remaining Quietways budget to help deliver:

- Zebra crossing and circular feature at McNeil Road junction to calm cycling downhill but minimise hindering it uphill
- Public realm intervention on the bridge with benches, creating green space
- Creating new informal pedestrian crossings along desire lines, such as leading to Love Walk, Canning Cross and Stories Road
- Minimise traffic signs and markings, taking advantage of new national traffic sign rules that came into force in 2016, such as through designation of a restricted parking zone (which would remove signs rather than add restrictions).