

# **OPEN OUR ROADS**

## **The negative impacts of the Crystal Palace and South Norwood LTN**

**Briefing note for all Croydon Councillors**

**December 2020**

## Purpose

We are briefing you about the negative impacts of the Council's Low Traffic Neighbourhood (LTN) scheme in the Crystal Palace and South Norwood wards which affect the health, safety and well-being of residents and visitors while decreasing the economic potential and development of the town centre. It's a controversial traffic scheme that has attracted opposition with over 6000 people from a cross-section of the local community having signed numerous petitions asking for the roads to be reopened, and a well-attended protest in Crystal Palace in November.

## What is an LTN?

LTNs have been promoted as a way to encourage more people to walk and cycle, called active travel, while discouraging unnecessary car journeys. The objective is to decrease congestion and lower pollution. The Council's stated purpose of this LTN was to respond to the Covid-19 pandemic as a way to provide socially distanced active travel.

## The issue

The Crystal Palace and South Norwood LTN was implemented without any baseline evidence or traffic modelling; no stakeholder consultations, including none of those with protected characteristics or emergency services; and no regard for the Council's statutory duties as a traffic authority.

Due to the lack of strategic planning and characteristics of the area, the LTN has had the opposite effect of its stated aims. It has:

- Increased congestion by diverting traffic onto main roads, including strategic A roads that were already at saturation point;
- Diverted traffic onto other residential roads that are ill-equipped to handle these traffic volumes – including roads in the neighbouring London Borough of Bromley, which was not consulted before the LTN was implemented;
- Increased pollution on main roads, some of which were already over the legal limits of pollutants, and so endangers the health of children whose schools are located on these roads, residents who live on these roads as well as pedestrians and cyclists who use these roads;
- Created delays in response times to emergency services, which we fear has the potential to lead to a preventable loss of life;
- Prevented vulnerable residents from accessing essential services, such as care visits and medical care;
- Disproportionately impacted the quality of life for BAME communities who live outside the LTN.

## **Our view is that Croydon Council's LTN in Crystal Palace and South Norwood ward is:**

- **Illegal** due to non-compliance with Road Traffic Act legislation, part of Judicial Review;
- **Discriminatory** due to the environmental apartheid it inflicts on majority ethnic minority areas;
- Creates **health injustice** by increasing pollution above dangerous levels on main roads;
- **Worsens** the climate crisis whilst also being **economically wasteful**;
- **Ineffective** at increasing cycling – and there are less disruptive ways to achieve that goal;
- Fails to achieve most of TfL's criteria for an LTN, instead it **creates more dangerous roads**;
- Causes **significant harm** to businesses, amenity and quality of life around shopping areas;
- **We call upon Croydon Council to remove the scheme completely.**

## **Background**

Between 2 May and 3 August 2020, the London Borough of Croydon (LBC) used Covid-19 amendments to the Road Traffic Regulation Act (RTRA) to close six roads, restricting vehicular access around Crystal Palace and South Norwood, calling it a Low Traffic Neighbourhood. The stated purpose was to encourage active travel while ensuring social distancing during the pandemic.

The roads around Crystal Palace's Triangle town centre and South Norwood have been consistently busier and more congested since the scheme was introduced, even during the second national lockdown.

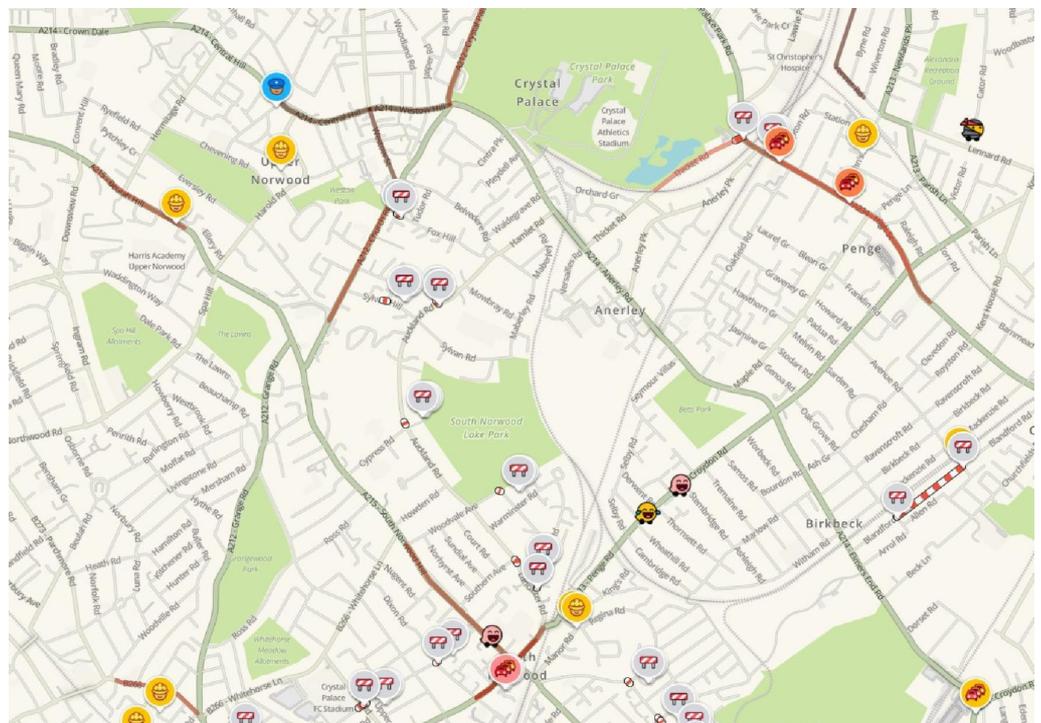
The council had claimed this increased congestion was caused by scaffolding that was obstructing one side of one road leading into the Triangle (Church Road). However, the scaffolding was removed in early November, and the problems have persisted due to effects of the LTN.

## **The locality**

Crystal Palace sits on the northern edge of Croydon at the top of a natural hill and is the meeting point of five London Boroughs (Croydon, Bromley, Lewisham, Southwark and Lambeth). Due to the local geography and topography, the area's main roads, which are part of the Strategic Road Network, funnel traffic into a meeting point at Crystal Palace, making it act as a central hub connecting each of the neighbouring boroughs.

The shopping streets are locally known as the Triangle, the three sides being Westow Street, Westow Hill and Church Road. The shopping area is vibrant, with many thriving independent businesses. These attract trade and visitors from outside the area to shop, socialise, eat out, enjoy the food market, watch a movie, visit the antique shops, and stroll round the famous and unique Crystal Palace Park with its Victorian dinosaurs.

It is key to understanding the issues to note that all of the A roads are heavily populated residential areas with schools, nurseries, homes for the elderly, entrances to parks, shopping areas, libraries and a main bus terminus.



### **The cause of the problem**

Sitting just off from the Triangle along Church Road are 3 side turnings: hill roads called Fox Hill, Stambourne Way and Sylvan Hill (all unclassified roads). These roads lead from Church Road to Auckland Road (a classified C road that crosses two boroughs and two postcodes) and the LTN closed these to motor vehicles on 3 August 2020. Auckland Road, together with Warminster Road and Southern Avenue had already been closed off to traffic by the Council since the first lockdown.

These roads all formed part of a network of roads that connected communities and at key times served as filter roads. For most of the day these side roads were quiet and without significant traffic. The impact of the closures has been catastrophic to the surrounding neighbourhoods.

The Triangle shopping area sitting on the Northern boundary of the LTN scheme has become the only route for a significant proportion of traffic that has been displaced by the road closures.

To the South and West, the boundaries of the LTN are formed by the main A roads in South Norwood – the A215 and A213. These roads converge at a narrow road junction on South Norwood High Street, at the centre of a local shopping area. This 4-way junction is a notorious bottleneck because its narrow road layout leads to frequent blockages when any vehicle is waiting to turn right, blocked by oncoming traffic. This is why many cars previously, very sensibly used Lancaster Road and Southern Avenue to bypass this junction.



These roads are now closed, funnelling further traffic through South Norwood Hill and the High Street.

## **The harmful consequences of the LTN**

The closed area is an enormous 2.4km x 0.85km - and this blocked off 2km<sup>2</sup> area effectively traps some c.5,000 households with no easy vehicular access. There are no shops or amenities in the closed streets, so for some the walk from their house to the shops would take c.35 minutes and involve a 1:20 hill climb.



It is our experience that most people do not make short unnecessary journeys: the assumption that short car journeys are luxuries to be foregone is highly contestable. For carers, tradespersons, the elderly, women juggling childcare and work and others, car use is vital, not just a lifestyle choice.

The net effect of the closures has been to push an estimated daily 6000 – 10,000 additional vehicles onto the main A roads in Crystal Palace that as per TfL data were already at capacity levels.



Most drivers are now forced into the Triangle resulting in regular congestion or gridlock with queues of vehicles and stop-start traffic, leading to more harmful pollution; most journey times are now longer, using more fuel and therefore adding more pollution.

This all happens at precisely the times these roads are busiest with other road users: parents walking children to school, commuters attempting to get to work, be that cycling, walking, or waiting at bus stops. Crossing the road is much more dangerous; social distancing on these roads is now impossible; and because of limited road space more cyclists are using the pavement.

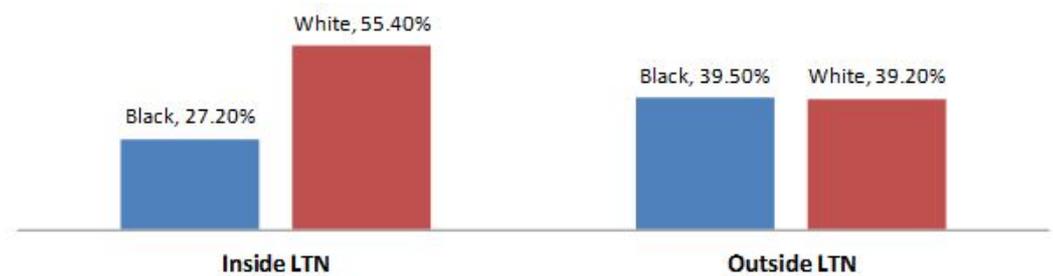
The additional congestion on main roads causes delays to emergency vehicles, increasing the risk of harm and potential risk to life.

There are severe delays to buses, making public transport a less attractive option for many.

Further, in the event of minor or major road incidents in the area or adjoining areas (e.g. accidents, burst water mains, floods) those roads are now completely gridlocked for hours when such incidents occur.

The junction on South Norwood High Street has been overwhelmed by traffic that has been diverted by the road closures, leading to very long queues on both of the A roads on the boundary of the LTN. These A roads pass next to Harris Academy South Norwood on two sides, where children’s play areas are located, and these are the same roads that children must use to walk to and from the school. The LTN is therefore exposing children to increased air pollution.

The ethnic and equality issues are of serious and immediate concern:



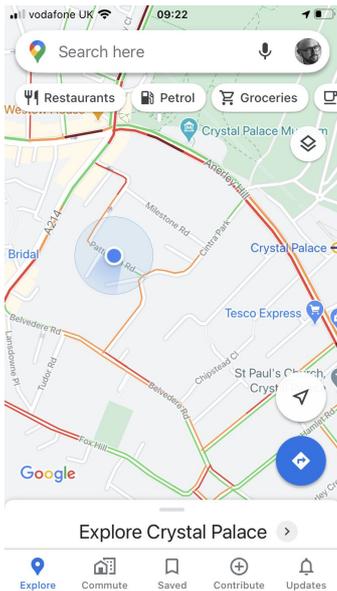
**Specifically, Councillors Stephen Mann, Nina Degrad, Pat Ryan, Clive Fraser, Patsy Cummings, Jane Avis, Pat Clouder, Karen Jewitt, Callton Young** in whose wards these pollution ghettos are being created, must reject all forms of discrimination and stand-up for these protected groups.

**This scheme harms and further reduces life expectancy for disadvantaged people for the benefit of the LTN residents.**

- Traffic has been diverted to areas with a significantly higher proportion of Black residents at 39%, compared to 27% in the LTN, which is 55% white (see Appendices [Ai: Population inside the LTN](#) & [Aii: Population bordering the LTN](#));
- Black males living in South Norwood and Selhurst already have a shorter life expectancy than other parts of Croydon – and 10 years less than anywhere else in the UK (see [Appendix B: ONS reported statistic](#));
- The main roads and areas traffic has been displaced to are home to some of the least well-off residents and deprived parts of LBC (see [Appendix C: Deprivation](#)).

Increasing pollution, congestion and further worsening these areas’ quality of life is not only morally unacceptable but the LTN as implemented is discriminatory. The current situation has created a dangerous and polluted environment for anyone using or living on the main ‘A’ roads and respiratory difficulties are exacerbated in areas of high pollution (see [Appendix D: Pollution](#)).

An equally distressing effect of the closures has been the displacement of traffic through a cluster of formerly quiet, narrow, winding, residential roads that sit nestled in the corner of the London Borough of Bromley (LBB) that were astonishingly advertised by LBC as alternative routes (Belvedere Road, Cintra Park, Patterson Road and Milestone Road). These roads are wholly unsuitable to take the additional traffic because of their narrow width and curves, and this leads to queuing traffic and the associated pollution problems that brings. The diverted traffic has also caused multiple road rage incidents in this residential neighbourhood, some of which were close to escalating into violence, and this has now become a public safety issue. All these issues have severely impacted these residents' quality of life.



**“Yet again all my clients late for appointments. Madness, just pissing me off.”**

**BUSINESS OWNER, WESTOW STREET, 14:54 06 DEC 2020**

Local businesses in Crystal Palace report that the road closures have had a direct impact on trade (from footfall, appointment data and customer feedback). This is partly due to some customers finding it less convenient to travel to Crystal Palace, and partly due to some avoiding the area because the increased vehicular pollution makes for an unpleasant shopping environment. Both of these problems have been directly caused by the road closures.

### **Flawed LTN rationale**

The official reason given for the road closures was Covid-19 related, to make the roads within the LTN safer for social distancing and to encourage cycling and exercising but those who live in the area are baffled by this.

- The area is blessed with parks, woods, lakes (approximately 30% of the area is covered in public green spaces);
- The topography (hill roads with approx. 1:20 inclines) can make walking or cycling to Church Road quite challenging for many people;
- The roads have generously sized pavements for walking with social distancing;
- The roads were already safe for cycling (data shows no cycling incidents on any of the hill roads and only two minor incidents on Auckland Road during the previous four years);
- The roads where most pedestrians are at risk (shopping, waiting at bus stops, taking children to school) are the main roads where all the additional traffic has been diverted.

**“So angry. I have had some really bad health issues in the last two and a half weeks. I have had to call an ambulance out to help me three times. All three ambulances have been held up or got stuck trying to get to me. I have asked today's one to please complain about these road closures as this is dangerous to people like me who need help.”**

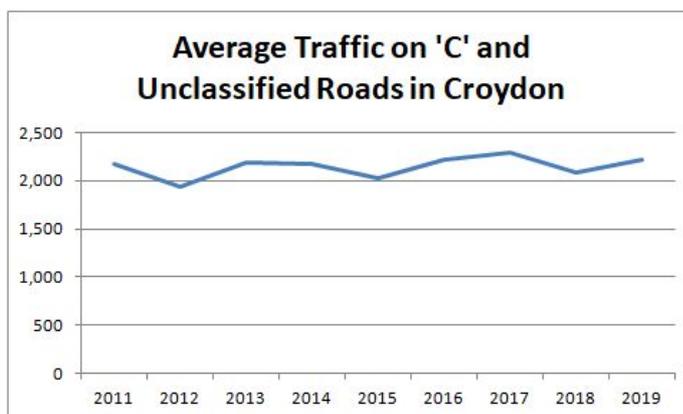
*LTN resident, Dec 2020*

We have seen no verifiable data that shows clear rationale as to why these roads were selected to be closed off. We believe this decision has been strongly influenced by the London Cycling Campaign who have lobbied for years to close Auckland Road to motor traffic. The closures of the vital hill roads were merely to protect Auckland Road for essentially the exclusive use of cyclists.

No baseline data was gathered around the area before implementation of the scheme against which to measure success or failure. It is our view that this must be a prerequisite of any major traffic scheme and that the Council should remove the roadblocks and undertake proper modelling assessments that go beyond a desktop exercise.

Some campaigners have presented unverified data using January 2013 as a baseline to show an increase in traffic volumes within the LTN. This data must be ignored as in January 2013 it snowed heavily and settled, forcing schools and public transport to close. Traffic volumes would have been artificially suppressed by the snow (see [Appendix E: Weather](#)).

In fact, official [DfT statistics](#) for one of the roads in the LTN show no increase over the last decade. This is a [trend](#) mirrored across all C and unclassified roads in the Borough of Croydon that were monitored by DfT over the last decade and thus there is no evidence of any traffic increase within the LTN during this time.



SOURCE: DEPARTMENT FOR TRANSPORT

The increase in the types of vehicles using our road network are borne out by market trends and TfL data analysis. Amazon sales in the UK have increased +69 percent between 2019 v 2014-18 as an average, while online grocery shopping has increased to 30 percent from 27.8 percent as a total of grocery shopping between 2019 v 2014-18 as an average. The online grocery market value doubled from the past six years.

TfL has recorded a 10 percent rise in the number of vans crossing its counting cordons. By the same measure, HGV flows have risen by 2 percent; and cars increased by 1 percent (Source: [TfL Travel in London Report 13](#)).

We have seen no evidence that would support the myth of ‘traffic evaporation’ on roads bordering and outside the LTN. Using the data from the much cited Cairns report on traffic evaporation, we’ve calculated an average increase in traffic on surrounding roads of up to 7 percent.

We’ve seen no evidence that the LTNs have decreased pollution. Conversely, traffic has worsened dramatically on already saturated roads, and pollution has increased from standing idling vehicles. This is occurring on roads, such as Church Road (A212), that Croydon Council’s own records show were already above the legal limits for pollution (See [Appendix F: Church Road air quality](#)) We have firsthand witness statements from long-term local residents and traders saying the level of traffic and gridlock now on the A roads around Crystal Palace and South Norwood is unprecedented.

We have seen no evidence, in the months that Auckland Road has been closed, of any significant increase in cycling. Any benefits that may accrue to a small number of cyclists are vastly outweighed by the huge economic, environmental and well-being cost paid by thousands of residents, road users and businesses.

## **In conclusion**

**We urge Croydon Council remove the scheme and conduct a full and proper independent traffic survey based on industry best practice, ensure robust and continuous pollution monitoring on the surrounding residential main roads, and work towards a local traffic management plan that is fair, just and works for everyone.**

**Thank you**

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