

To Louise McBride
Head of Highways and Transport
London Borough of Lewisham
Laurence House, 1 Catford Road
London
SE6 4RU

Via Email: Louise.McBride@lewisham.gov.uk

26 August 2020

Objections to Temporary Traffic Orders

Dear Ms McBride,

I refer to the following Temporary Traffic Orders:

1. The Lewisham (Various Roads) (Covid-19) (Phase 1) (Temporary Prohibition of Traffic) Order 2020 made on the 22nd June 2020 covering the closure of motor vehicles from entering or proceeding along South Row, Montpelier Row, George Lane, Glenbow Road, Kitto Road, Bishopshorpe Road, Silverdale Road and Scawen Road.
2. The Lewisham (Various Roads) (Covid-19) (Phase 1b) (Temporary Prohibition of Traffic Order) dated 6th July 2020 covering the closure of motor vehicles from proceeding along Cambridge Drive, Dallinger Road, Dermody Road, Ennersdale Road, Holme Lacey Road, Manor Lane, Leahurst Road, Leyland Road, Manor Lane Terrace, Manor Park, Upwood Road and Woodyates Road.

Please note our objections to those Traffic Orders for the following reasons:

A – There are many complaints from people who are suffering large additional journey times from the road closures – typically in getting to work, going to local shops or to hospitals – and that’s before the schools return. Times of up to an additional hour are mentioned in complaints to us.

B – There are numerous complaints from those who cannot easily walk or cycle due to health conditions and find it ridiculous to suggest they do so. In addition they wish to avoid public transport while the epidemic is around as many of them fall into the “vulnerable” category. In practice you are discriminating against the elderly and disabled by closing roads to vehicular traffic which we believe is a breach of the Equalities Act 2010. No adequate review of this issue has been undertaken by the Council.

C – The road closures have created additional traffic congestion and associated air pollution on the main roads in the area such as the South Circular, Burnt Ash Road, Lee High Road, etc. Many people live on these roads and are affected.

D – The diversion of traffic from the closed roads to other minor roads, has affected other residents. In total there is no evidence that overall traffic has been reduced, and it does not happen – see this article for a study that showed this:

<https://abdlondon.wordpress.com/2020/08/18/are-there-any-benefits-from-low-traffic-neighbourhoods-ltns/> . The claim that traffic “evaporates” from Low Traffic Neighbourhoods is simply not true and neither do they produce significant modal shift.

E – Numerous problems have been caused to emergency service vehicles such as ambulances, fire engines and police vehicles which are unable to get through the barriers and have difficulty finding a way around them. They allegedly should have keys to the bollards which have been installed in addition to the “modal filters” but apparently do not do so. Many examples of delays from this cause have been reported to us.

F – The problems caused to delivery drivers and other local services for similar reasons.

G – Complaints about the use of the Covid-19 epidemic as an excuse to bring in emergency measures to help social distancing when road closures have no benefit at all in that regard.

H – The failure to consult local residents on the closures before they were put in.

I - The Temporary Traffic Orders (TTOs) provide no adequate justification for the closures. For example the second one mentioned above says “for purposes connected to coronavirus so as to maintain social distancing”. But modal filters do not enhance social distancing in any way. In fact they might just force people onto public transport where they are more exposed to the virus by close contact with people. Many of these road closures are taking place on streets where there are wide pavements and hence no difficulty in maintaining social distances.

J - Temporary Traffic Orders should only be used as temporary measures and in emergencies. They should not be used to implement longer term policies. But it is clearly the stated objective of Lewisham Council to make these measures permanent in due course.

K - In fact the "Healthy Neighbourhood" proposals for Lee Green were published well before the Covid-19 epidemic even became widely publicized. The road closures that have been implemented in Lee Green exactly match the original proposals for the area and hence have nothing to do with the Covid-19 epidemic. Lewisham Council is not acting in good faith in using the epidemic as an excuse for the road closures.

L – You are ignoring the network management duty in the Traffic Management Act 2004 Section 16 which lays down an obligation to secure "the expeditious movement of traffic on the authority's road network" and "the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic...."

M – Note that the "Network Management Duty Guidance" issued by the DfT in response to the Covid-19 epidemic cannot override the above obligations. Certainly the epidemic does not provide a justification for doing so.

Please note the contents of this letter and advise your response.

Yours sincerely

Roger Lawson
Campaign Director