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Dear Mr O'Keefe,

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Herne Hill Junction Highway Scheme – new slip lane carriageway through Brockwell Park

We have received a consultation from the London Borough of Lambeth regarding the above applications. Our role as the Mayor of London's strategic urban design advisory body does not extend to advising individual boroughs on planning applications but we would like to convey to you our comments on this scheme.

We agree with the analysis contained within the application submission that the current junction at Herne Hill is of a wholly inadequate design which encourages dangerous and illegal traffic manoeuvres which are hazardous to pedestrians and cyclists, causes delays to bus services and is an unworthy gateway to Brockwell Park.

There are a number of improvements proposed as part of the scheme submitted to the planning authority that are commendable, particularly the upgrading of pedestrian crossing facilities, introduction of advance stop lines for cyclists and the traffic calming/landscaping of the southern end of Railton Road. We support the objectives of creating a much higher quality walking environment and measures that encourage a modal shift towards cycling and public transport and away from a dependency upon the private car. The proposal to restore the park boundary railings and gates and the removal of later 20th Century accretions such as the lavatory block and unsympathetic fencing which detract from the character of the park are welcomed.

The current park boundary is a constraint to the improvement of the flow of traffic using the junction (particularly buses and cycles) and we accept the principle set out in Lambeth's Unitary Development Plan adopted in August 2007 (Policy 67) of sacrificing "a **very small part of Brockwell Park..where this is essential to these improvements and the character of the Conservation Area/Historic Park is not harmed**".

However it is considered that the extent of the proposed land-take to create a slip road **does not constitute 'a very small part of the park' and would result in an unacceptable loss of Metropolitan Open Land and the Grade II listed historic park which would fail to preserve or enhance the character or appearance of this conservation area**. The creation of a large paved island with no obvious purpose surrounded on all sides by vehicular traffic in front of the park gates in no way compensates for the loss of 1070 square meters of parkland.

It is a concern that the project engineers seem to have taken the easiest route to improving general traffic flow by simply cutting off the corner of the park to replace it with traffic. Had the park edge been a building line a way would have been found to resolve the situation as has been done in countless heavily trafficked locations around London.

The scheme claims to be a holistic design for the area yet there is little evidence of any urban design strategy or consideration of the wider context of the junction. This is evident in the proposal to create a pedestrian space at the southern end of Railton Road which has been designed in isolation from a more comprehensive enhancement of the remainder of Railton Road – this is a missed opportunity.

Taking a London-wide perspective we are very concerned that the loss of Metropolitan Open Land and registered historic parkland within a conservation area which also provides the setting for a Grade II* Listed Building, represents a most undesirable precedent within the capital.

At a time when the Mayor is promoting schemes across the city that increase the amount of parkland or public open space (such as the part pedestrianisation of Parliament Square and the remodelling of Marble Arch which could return a significant area of green space to Hyde Park), the loss of over 1000 square meters of Brockwell Park to facilitate a traffic proposal seems regressive.

We would also make the following detailed points:

- 1) The creation of a long straight section of road immediately in front of the gates is questionable as this is likely to encourage traffic moving at considerable speed along the unsignalled slip road putting pedestrians at risk and leading to the inevitable erection of unsightly guard railing to prevent motor vehicles colliding with pedestrians leaving the park. Whilst a number of straight-across crossings are proposed, it is regrettable that half the crossings in this scheme are staggered. This would mean that pedestrians are penned onto traffic islands which is most unsatisfactory.
- 2) It is noted that the slip road is a single carriageway – this means that if any vehicle (bus, car or goods vehicle) breaks down on the slip road a total blockage of this route will ensue which would cause major disruption at this junction and delay bus services using Norwood and Dulwich roads. Drivers may then seek to make a detour around the blockage by either driving onto the island endangering pedestrians or making an illegal manoeuvre turning left onto Dulwich Road at the signalled junction. This is likely to result in calls to widen this slip-road creating a two lane highway with even more detriment to the park and to pedestrian flows into and out of Brockwell Park
- 3) With regard to the transport and traffic analysis we have some major concerns with the proposed scheme. The scheme shows a three lane south bound junction exit into Norwood Road. Given that it is currently two lanes wide and not identified as a significant problem, on the basis of the information submitted this seems unnecessary. The lane appears to accommodate a new bus lane but as queuing here has not been identified as a problem, this is not considered appropriate given the space constraints of the junction.

- 4) The planning application fails to mention where the bus stops removed from Railton Road (for Nos. 3, 196, 201 and 322) will be re-located. This should be addressed as the increased number of buses stopping on Dulwich Road and Norwood Road will have an impact on the traffic. A remodelling of the area will also present an opportunity to rationalise the bus stop locations, a significant tool in traffic management.
- 5) There is no diagram, description or evidence of the "improved public transport interchange". While the benefits of improved bus journey times are described, it would be helpful to demonstrate a wayfinding strategy for passengers interchanging between different routes and transport modes. If the bus stops are to be relocated to Dulwich Road for example, a clear benefit might be the increased usage and therefore improved natural surveillance of Brockwell Passage. One disbenefit would be the distance to walk to the bus stops from the station. There is also no indication as to how bus passengers will be aware that they are arriving at Herne Hill Station. Currently bus passengers can clearly understand when they reach the station because they disembark directly in front of the ticket hall.

We therefore recommend that Transport for London does not support this project until it has been reconsidered to significantly reduce the amount of parkland that is to be lost and address the other urban design issues outlined above.

Yours sincerely,



Peter Bishop

Director – Design for London

cc Giles Dolphin – GLA Planning Decisions Unit

Peter Brown – TfL

