

**Comments on Consultation on TfL's proposed changes to the (A3) Tolworth Road/ Kingston Road Junction (the "Tolworth scheme" or the "scheme")**

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Dear TfL

Here are my comments on your consultation for the above Tolworth scheme.

**SUMMARY**

The document is misleading, inaccurate and incorrect. It provides inadequate information, evidence and analysis for the positive conclusions reached and, as such, does not provide the basis for a meaningful and neutral consultation. The consultation appears to have made a pre-determined decision that this scheme should go ahead. It is not able to engage residents in a meaningful way nor does it allow residents to give informed comments on its content. The scheme and the consultation are deeply flawed. The consultation is therefore unsound and this scheme should not be allowed to progress.

The scheme should have been consulted upon with residents at an earlier stage. Why were only the council and other corporate stakeholders consulted on earlier?

Why is the extent of previous consultation covered under the EqIA? There is no evidence that people with protected characteristics have been consulted on these proposals.

The scheme is not justified on the basis that it has been conceived. The scheme is preparing the area for a massive increase in traffic arising from FUTURE development that has not yet been agreed. This is unacceptable. The document is vague and contradictory about the scheme's objective – making the consultation unsound.

The Kingston Development Scenario Testing Documents (the "DST documents") for the new London Plan show plans for the development of 8,125 new homes in Tolworth and the equivalent of a further 7950 one-bed flats in commercial development. This will lead to huge increases in traffic for

which this scheme is laying the ground. This is not acceptable or democratic given that the new London Plan is not finalised and still open to legal challenge. Moreover, Kingston's Local Plan targets are also not yet agreed.

The Equalities Impact Assessment highlights by omission how people with protected characteristics will be severely negatively affected by the scheme which makes the scheme unviable on this basis alone.

The scheme results in significant negative impacts on pedestrians and has completely overlooked the effect of increased exposure to pollution for pedestrians from the requirement to cross the road at surface level upon closure of the south west subway. Pedestrians will suffer as a result of this scheme whilst car and bus users will see minimal benefits. The proposal for a shared cycle/ pedestrian/ wheelchair pathway is unsound and the benefits are not evidenced

The scheme has also failed to assess the noise and environmental pollution and mental stress to which residents will be exposed during the construction phase. The scheme has not assessed the extent to which Compulsory Purchase Orders will be needed to be used to make the scheme happen and the effect on people's mental health of not knowing if they will lose their homes to a scheme

No sustainability assessment of this scheme has taken place. What impact will this scheme and future proposed changes at the Hook Junction have on the environment and biodiversity?

It is impossible to respond in an informed way to the scheme consultation given the lack of information and sound analysis. Why was the CPOS report not published with the document?

The Appendices to the scheme consultation are missing. This renders the consultation information incomplete. For example, evidence about the impacts of the scheme on pedestrians in the Analysis Legion Modelling is not provided as stated. The consultation is therefore unsound.

- **Royal Borough of Kingston upon Thames ("Kingston")**

You state that Kingston is "undergoing rapid change and will see substantial growth in the coming years".

This is incorrect. The new London Plan has not yet been signed off and Kingston's growth targets in that plan are still open to challenge. Meanwhile, the Local Plan has only been "consulted" on a single time and that consultation was, in itself, unsound

- **Increase bus journey times**

The assertions you make about increased bus journey times are unsubstantiated. What are "the developments" that will cause the increases in journey times mentioned? The consultation is unsound because the premise on which assertions are made is unclear.

Why is more development even being considered if even a relatively small proportion of the planned increase in the number of homes and other development in the area will cause massive delays?

- **Major transport interchange with national rail and bus services**

Where is the "major" transport interchange with "national" rail and bus services? This needs to be clarified for anyone responding to the consultation in a meaningful way. What national services will exist from this major transport interchange?

- **Removal of parking bay at Dean Court**

It is stated that this is in order to "facilitate FUTURE changes required by developers". This appears to pre-determine that future developments will be approved. This is against the democratic and statutory planning approval process.

- **Healthy Streets**

The consultation document and attachments show that an "overall improvement is demonstrated" from the scheme. However, no data is provided to show how the assessed "improvements" have been arrived at

The assessment does not include any measure of increased exposure to pollution for pedestrians having to cross a busy road at surface level after the south west subway has been closed, or of the effect of pollution and longer journey times on all people and specifically on people with protected characteristics

- **Equalities Impact Assessment (“EqIA”) supports the assertion that the scheme is unsound and does not meet TfL’s six priorities**

- **Unsound assertions**

If the traffic impact of developments already committed in Tolworth will result in a “significant adverse impact on already poor road performance”, why were the developments in question approved without any simultaneous commitment to improve transport infrastructure?

It appears that the decision to approve both development and this scheme were pre-determined and that this scheme will go ahead whether or not it is sound and whether or not residents agree with it

- **Circular arguments that reflect pre-determined decisions to approve massive development plans in Tolworth**

The EqIA reveals that the true objective of the scheme is being concealed from residents through the provision of conflicting and contradictory information.

In Q1, Outline, this is the stated purpose of the scheme:

“As a large number of developments are **already committed**, it is critical that improvements at Tolworth roundabout are delivered to mitigate their impacts and **support future growth** in the area”

However, in Project Scope, the objective of the scheme is stated to “support delivery of **consented** developments”

The whole argument that this scheme is being undertaken to support future development that has not yet been approved even at London Plan level, makes the scheme unsound

- **The project does not respond to any of TfL's six priorities**

The purpose of the project is to facilitate development that has not yet been approved at London Plan level or in Kingston's local plan. This makes the scheme and the consultation premature and unsound

- **The links between the scheme objectives and TfL's outcomes and unexplained, unclear and make no sense**

This makes it impossible for any person to respond in an informed way to the information given

- **Confused and unclear information used to justify the scheme**

If a further 8125 new homes are to be built in Tolworth and the equivalent of 7950 one-bed flats built in commercial space, the traffic in this area will soar (figures from DST documents). It is not clear how this scheme will address issues arising from such huge development. The effect on pollution, noise pollution and mental stress on residents and people using the roads on foot or on cycles or in wheelchairs has not been considered

- **The assertion that the scheme will result in "improved pedestrian and cycle connectivity" is not evidenced or justified**

Pedestrian journey times will be significantly longer as will distance travelled. The same is likely to be true for cyclists and wheelchair users, all of which will have to cross the A3 at street level and the journey times of whom are likely to be slowed down by sharing of the same path

- **Statements about the effect of the scheme on pedestrians are wrong**

***The scheme will have a significant negative impact on pedestrian journeys. Indeed, pedestrians come out worse from this scheme than CAR and BUS users***

The evidence contradicts the assertion that this scheme will have a “negligible impact” on pedestrians as mentioned in the EqlA, nor that there will be “slight increases” in journey times and walking distances, or that “comfort levels will remain within an acceptable range”.

Indeed, 22% fewer pedestrians will have a walking distance of less than 120 m and 25% of journeys on foot will be **2 minutes slower**. This compares to an improvement in bus journey times of a **maximum of 56.64 seconds** and a decrease in car journey times of a **maximum of 36.35 seconds** as a result of a 4<sup>th</sup> traffic lane

The assertion that the scheme is beneficial to pedestrians is unsubstantiated. **The sharing of a footway with cyclists** brings dangers to which the consultation document itself refers: “Cyclists on the pavement were an annoyance because they can be hard to hear and move fast”

- **Insufficient data and analysis on Crime and Disorder**

The impact of retaining a subway AGAINST recommendations is not explained  
It is hard to comment on this section without seeing the CPOS report

- **Insufficient, inadequate data and analysis on the negative effects of the scheme on people with protected characteristics**

The document fails to address the negative impacts of the scheme on people with protected characteristics. It merely lays out some generic facts about the effect of the scheme in a most general sense that has nothing to do with protected characteristics. Nothing is said about the impact of the scheme on people of different races or sexual orientation. This is a big oversight given the possibility of muggings and hate crimes, nothing is said about the effect of the scheme on homeless people who may, for example, currently use the south west subway which is to be closed for shelter

The section on AGE does not relate to the age of people in any way and does not address any issues, and the same wording is then simply repeated to cover disability, gender and “other”. The section on pregnancy and maternity refers simply to women with buggies. This is inadequate analysis and no conclusion is drawn from the information provided

This EqIA is unacceptable and completely flawed

- **Overly positive assessment of the positive impact of the scheme**

The report is full of irrelevant information and generalities that are meaningless.

The assertions made are not justified. For example, how will a shared pedestrian and cycle footway “benefit some older people”? How will a shared footway encourage the over 65s to cycle? How will longer journey times encourage younger and older people to walk? How many mothers will require seating on their journeys? How will “socially excluded groups be welcomed by this scheme”? What does that phrase even mean?

- **Consultation**

It appears that people with protected characteristics have not been consulted on this scheme

The council have stated their support for the scheme. On what basis is such support given? It is not enough to say that the council supports it on residents’ behalf without evidence or justification

No detailed information has been given on who was consulted. I have requested full information under a Freedom of Information Request through WhatDoTheyKnow.com.

A resident of Ewell Road did not receive any letter and Chessington District Resident Association also was not consulted

Q7 – gives no detailed information on the nature of the consultation undertaken or the outcomes of meetings. It appears that no “other projects” were discussed as required.

- **Mitigations for Negative Outcomes are flawed, inadequate and incomplete**

Given the inadequacy of the negative impact assessment in the EqIA, the mitigation assessment is equally flawed. In addition, it is not sound to argue that a longer journey time can be mitigated by a “safer and more direct” crossing, especially when journey times will be longer.

The document also fails to address how this mitigation is justified and why other subways are not therefore being closed and the effect of noise and vehicular emission pollution on pedestrians being forced to cross the road at surface level with hugely increased traffic flows forecast from massive increases in development without improvements in rail services

The document fails to address the dangers presented to pedestrians and wheelchairs users from sharing a footway with cyclists

- **Action Planning**

This section is flawed by nature because the whole document is inadequate, not evidence based, makes unsound assertions and draws unsound conclusions.

The Action Plan also brings up issues relating to the construction period that have not been considered at all in the consultation document

Major issues to do with noise and vehicular pollution and environmental and biodiversity effects of the scheme and the construction phase of the scheme, of increased vehicular traffic as huge residential and commercial development takes place, and massive disruption to the lives of people from all over Kingston and beyond are completely overlooked and not measured in any way.