# Old Kent Road Area Action Plan New and Amended Policies

Final Submitted

Closes 13 Sep 2017

Opened 21 Jun 2017

## Contact

Planning Policy

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Consultation Questions

Introduction

1. What is your name?

Name Southwark Cyclists

2. What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email [southwark@lcc.org.uk](mailto:southwark@lcc.org.uk)

3. What is your address?

Southwark Cyclists

London Cycling Campaign

Newhams Row

London

SE1 3UZ

4. What is your organisation?

Organisation (if applicable)

Southwark Cyclists

5. Do you have any comments on the proposed amended site allocation OKR 11: Galleywall Trading Estate?

Answer: No

6. Do you have any comments on the proposed amended site allocation OKR13: Rotherhithe Business Estate, Bermondsey Trading Estate and rail viaducts?

Answer No

7. Do you have any comments on the proposed amended site allocation OKR18: Gasworks, Southwark integrated waste management facility (IWMF) and electricity substation?

Answer No

Proposed policy and map changes

We have proposed some new and amended planning policies for the Old Kent Road area along with proposed policy map changes.

Planning policies and map changes

8. Do you have any comments on the new policy AAP0: Social regeneration?

Answer. The current levels of motor traffic on the Old Kent Road are a cause of community severance. We would like to specifically support AAP0 for explicitly recognising that the transport improvements, particularly the public realm, walking and cycling improvements, and the proposed reduction in motor traffic, will benefit the area’s social infrastructure and can be counted as a community facility.

We also have a number of concerns about potential suggestions in the TfL Strategic Cycling Analysis that arterial cycle traffic north of the junction with Dunton Road should be primarily served by Quietway one. This level of traffic would be wholly unsuitable in the area between Page’s Walk and Law Street, and would impact upon social regeneration in the area.

A fuller description of our concerns can be found in our response to AAP25 (Air Quality).

9. Do you have any comments on amended policy AAP11: Employment Clusters?

Do you have any comments on policy AAP 11a: Workspace and business development?

No

Do you have any comments on policy AAP 11b: Mixed Use Employment Areas?

No

10. Do you have any comments on amended policy AAP12: Town Centres?

Answer. No

11. Do you have any comments on amended policy AAP21: Car Parking?

Answer. We suggest that the whole of the OKRAAP is of sufficiently high PTAL to justify it being a car free development, excluding a small number of shared ownership (car club) parking spaces and the recommended number of blue badge or disabled parking spaces.

12. Do you have any comments on amended policy AAP22: Green Infrastructure?

Answer. No.

13. Do you have any comments on amended policy AAP23: Flood Risk and sustainable urban drainage system?

Answer. No

14. Do you have any comments on amended policy AAP25: Air quality?

Answer

We support the proposed policy AAP25 for recognising increased support for cycling as a way to increase air quality. We would also highlight that low air quality tends to suppress uptake of cycling, so general air quality improvements would be expected to support further uptake of cycling.

With respect to Reasons 2.4.8. the document states that “The council is also using wider mechanisms to improve local air quality in the opportunity area, including by seeking the support of TfL for creating a Low Emission Bus Zone on Old Kent Road and delivering a Healthy Streets pilot.”

Southwark Cyclists would like to highlight limitations with the treatment of the Old Kent Road in various TfL documents released to date, particularly the Strategic Cycling Analysis’ (SCA) application of Healthy Streets principles to the OKRAAP area. This seems to imply that only the OKR south of Dunton Road be considered priority strategic cycling connection. This has implications for Air Quality, but may also inform the wider redrafting of the final OKRAAP.

We propose that the SCA’s theoretical analysis of the area cannot be directly applied to the transport infrastructure, built environment or place function of the future OKR. The OKRAAP should directly address this and state support for 2.5m segregated cycle lanes along the whole length of the OKR, and along the New Kent Road (NKR) to the edge of the OKRAAP area, where they meet existing segregated routes.

Studying the SCA, Fig1.3 states that the whole OKR and NKR are in the top 20% of current journeys and the top 20% of potential increases. However, the Prioritised Strategic Cycling Connections map (fig 2.4) only shows that the OKR south of Dunton Road should be prioritised for cycling-infrastructure improvements. Around the current junction with Dunton Road the cycle routes split to an east-west route through Burgess Park and a spur linking up to the pre-existing Quietway 1 route. As the SCA states that it "This map does not represent specific alignments for routes, or a delivery plan.", the split primarily occurs because the northern section of the OKR is approximately 400m or less from the existing Quietway 1 route.

A number of other analyses also indicate that the northern section of the OKR is not being considered as a priority strategic cycle route:

On page 33 the whole length of the OKR is then used as the worked example for an all-modes Healthy Street. However the example carriageway width is wider than the pinch point at Madron Street, which may imply that the narrower section of the OKR is being excluded.

On page 38 the OKR south of the Dunton Street junction is marked as "potential connection beyond 2022". The area to the north is not marked as such.

Page 51, fig 5.1: NKR and the OKR north of Dunton Road are not listed as a potential connection for further study, whilst the area to the south is.

Southwark Cyclists’ proposal

We have severe concerns with these analyses from TfL.

We argue that the OKR should be a Healthy Street with 2.5m segregated bicycle lanes along its entire length. In relation to the newly expanded OKRAAP area, the cycle lanes should stretch from the western border of the OKRAAP, which is from the NKR’s junction with Harper Road and Balfour Road, to the termination of the OKR in New Cross Gate.

Reasons for our concerns

The SCA openly states that its maps do “not represent specific alignments for routes, or a delivery plan." These comments are not a rejection of the SCA’s analysis. We support the principle of using data analysis to identify areas and routes to prioritise. However, we also support the SCA’s acknowledgement that final route alignments will need to be “considered in terms of their wider impacts and deliverability.”

1. Building an isolated segment of segregated TLRN cycle path as a spur from a quietway is non-intuitive for wayfinding. Currently a segregated route stretches from the north-south superhighway and along the New Kent Road to Balfour Road, whilst the Southwark Spine is proposed to run along Harper Road, with a crossing to Balfour Road. Further explanation of why the TLRN is a priority for wayfinding is found in the SCA page 5.
2. The OKRAAP aims to intensify the high street place function of the majority of the OKR. The SCA, on page 5, directly states that trip attractors and people’s ‘mental maps’ are disproportionally based upon these main roads, meaning that cycle improvements on, rather than only close to, the TLRN are essential.
3. Quietway 1 in the area between Page's Walk and Law Street is physically unsuitable for the expected level of cycle traffic. At two points it becomes an approximately 2m wide shared use path, which passes through council estate courtyards. The space is physically constricted and its primary place function is residential common space. This is entirely inappropriate for the high volumes of cycle traffic that would be generated by the redevelopment of the OKRAAP area, and the increase of cycle flows from across Southwark and Lewisham boroughs that will be generated by cycle infrastructure improvements along the OKR.
4. Potential to improve the pedestrian environment (SCA, fig 3.1). The OKR north of the Dunton Road junction is an area with significant potential to convert motorised trips to walking trips. Segregated cycle paths are significant means of reducing air and noise pollution, whilst also moving motor traffic away from the footway.
5. The whole lengths of the OKR and NKR are in the 20 per cent poorest performing areas for walking and cycling safety (p29). Given the scale of road danger on these roads, and the inevitability that significant numbers of cyclists will continue to use the NKR and the OKR north of Dunton Road, it is essential the 2.5m segregated cycle lanes are installed the whole length of the road. More broadly this links to the Vision Zero policy of the Mayor’s Transport Strategy.

Given the expanded size of the OKRAAP area, Southwark Cyclists will now be campaigning for the final proposed OKRAAP to include a segregated cycle lane stretching from New Cross Gate to the west edge of the OKRAAP at Harper Road, linking to the NKR segregated cycle lanes and the Southwark Spine.

15. Do you have any comments on the changes to the planning proposals map?

The western extension of the OKRAAP area means that our previous calls for a 2.5m segregated with-flow cycle lane on each side of the Old Kent Road, for its entire length, should also apply to the area of the New Kent Road now covered by the AAP.

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