**“Southwark’s Draft Kerbside Strategy”**

Southwark Cyclists consultation response

13/04/2017 draft, incorporating feedback on 12 April Monthly Meeting

**Outline notes**

Strategy published for public consultation on 24th February, consultation closes on 28th April.

The consultation has 10 questions. This document contains a detailed response to be submitted in the name of the group, and which will be hosted on the website for reference or members’ detailed responses.

https://consultations.southwark.gov.uk/environment-leisure/kerbside-strategy/consult\_view/?utm\_name=

Note: to suggest specific kerbside alterations visit [**https://southwarkkerbside.commonplace.is/**](https://southwarkkerbside.commonplace.is/)

**Draft Response from Southwark Cyclists (can be added to up to submission on 26th April)**

**Context**

Southwark Council’s Kerbside Strategy[[1]](#footnote-1) states that: “The kerbside is the space which people often think is just for car parking. The kerbside is the space on the public highway that is next the footpath (i.e. at the kerb). For the purposes of this document, this includes both the carriageway and nearside footpath space.

Examples of kerbside use can include street seating, bus stops, cycle and car parking, waste collection, servicing and deliveries and tree planting. The market stalls at East Street in Walworth or the distinctive white posts and grass verges of Dulwich are examples of how the kerbside can be used to shape a place’s identity.” (p3)

**Proposed responses from Southwark Cyclists**

1. **Do you agree or disagree to the following statements about your street?**

5 sub-questions to be rated from “Strongly agree” to “Strongly disagree”. There is no “Comments” box.

* I enjoy being in my street
* The air quality in my street is poor
* My street is easy and safe to cross
* I could easily find somewhere to stop, sit or rest if I needed
* I feel intimidated by the traffic in my street

Southwark Cyclists will reply with NA, as they do not have a “my street”. The group advises that individual respondents answer according to personal opinion. However, they highlight that air pollution exceeds legal limits in much of Southwark, and further information can be found at www.howpollutedismyroad.org.uk/

Questions 2-5 have the options Yes/No/Not Sure and Other Comments. We suggest the following:

**2. More people walk in Southwark than any other mode of transport. Do you think it is fair to provide more space for people walking?**

Yes

We support measures to support walking as part of Southwark Council’s “adopted movement hierarchy” (p10). We particularly measures that reduce the dangers experienced by vulnerable road users by reducing sources of road danger. As such we support measures that reallocate space from general traffic towards space for people walking, but generally oppose measures that reallocate space from cycling to walking, or which would expose cyclists greater danger.

We specifically support the example policies given on page 9, which are to “improve pedestrian visibility by restricting unsafe parking at junctions and pedestrian crossing points with increased use of kerb build-outs and double yellow lines”, to prioritise interventions around schools, and taking account of local context. We furthermore support double yellow lines to protect the public right of way at dropped kerbs, to pre-empt kerbspace use at places suitable for new housing without car parking (e.g. Flaxyards) and extending 10 m from junctions, as in rule 243 of the Highway Code. We would add action to reduce air pollution caused y idling motor vehicles.

We support the strategy’s concerns that road usage is changing due to the growth of deliveries from online shopping, the growth of digital navigation (sat-nav) routing inappropriate volumes of traffic down residential streets, and the growth of minicab-apps such as Uber, and the intensification of land use in Southwark. In this context, many of the kerbside strategy’s goals cannot be achieved through kerbside measures alone, in particular: streets that are “easy to cross”, “not too noisy”, have “clean air” and in which people from all walks of life “choose to walk and cycle” (p4).

We argue that Southwark’s kerbside goals will only be achieved through the installation of measures preventing through-traffic by motorised vehicles (filtered permeability), whether by physical filtering (e.g. bollards) or digital filtering (e.g. geofencing, ANPR enforcement of Heavy Goods Vehicle restrictions). In identifying locations for prioritisation, we suggest streets around schools, that have existing air pollution exceedances, or inappropriately high levels of traffic for a residential street. We suggest that, via some sort of kerbside Level of Service metric, an unbroken low air pollution route network should be established across the borough. This would produce corridors through the borough that could be preferentially used by those seeking or requiring low pollution routes, such as with asthma, emphysema, or other breathing conditions. A starting point could be upgrades to the Quietway network, justified through their benefits to all residents.

**3. Cycling is increasing in Southwark. Do you think it is fair to provide more space for cycling (such as trialling lanes, cycle parking and cycle hire stations)?**

Yes

Our headline comment is summarised by comparing cycling’s forecast mode share with and without the kerbside policies, as set out in Appendix C. Without the new policies, cycling’s mode share in 2025 would be 3.9%; with the new policies it would be 10.0%. We do not know the methodological basis of the calculations. Assuming the basis is sound, the contrast is dramatic and, from our pro-cycling point of view, fully justifies the kerbside measures proposed.

We support measures to support cycling as part of the adopted movement hierarchy (p10), particularly measures that protect vulnerable road users by reducing sources of road danger. As such we support measures that reallocate space from general traffic towards space for cycling, but generally oppose measures that reallocate space from walking to cycling, or which would expose pedestrians to greater danger. Within this we believe that “floating” bus stops, where appropriately designed and located, can be a means of reducing the road danger that cyclists are exposed to without posing a hazard to pedestrians.

We support the policy of reaffirming that walking is a viable mode of transport for the elderly if the right infrastructure is provided (p6) and add that the same is true for cycling. The potential and aspiration for cycling’s demographics to more closely match Southwark’s demographics is a key part of Southwark’s previously adopted Cycling Strategy, and could be more forcefully expressed within the kerbside policy.

We support the “85 per cent principle” as a target for ensuring the regular turnover of parking spaces (p13). We suggest the similar aim for an 85% occupancy rate with respect to bicycle parking infrastructures, as currently occupancy rates tend to be far over 85%, particularly in the installed secure on- or off-street secure lockers and bike hangars. This demonstrates significant evidence of demand for cycle parking that might be included in the appendices to the kerbside strategy, if other consultation responses question the demand for bike parking.

We support the “Innovative cycle parking” measures described on page 11.

The place of cycle parking in the movement hierarchy should be equal with cycling, rather than motor parking.

We support the strategy’s concerns that road usage is changing due to the growth of deliveries from online shopping, the growth of digital navigation (sat-nav) routing inappropriate volumes of traffic down residential streets, and the growth of minicab-apps such as Uber, and the intensification of land use in Southwark. In this context, many of the kerbside strategy’s goals cannot be achieved through kerbside measures alone, in particular: streets that are “easy to cross”, “not too noisy”, have “clean air” and in which people from all walks of life “choose to walk and cycle” (p4).

We argue that Southwark’s kerbside goals will only be achieved through the installation of measures preventing through-traffic by motorised vehicles (filtered permeability), whether by physical filtering (e.g. bollards) or digital filtering (e.g. geofencing, ANPR enforcement of Heavy Goods Vehicle restrictions). In identifying locations for prioritisation, we suggest streets around schools, that have existing air pollution exceedances, or inappropriately high levels of traffic for a residential street. We suggest that, via some sort of kerbside Level of Service metric, an unbroken low air pollution route network should be established across the borough. This would produce corridors through the borough that could be preferentially used by those seeking or requiring low pollution routes, such as with asthma, emphysema, or other breathing conditions. A starting point could be upgrades to the Quietway network, justified through their benefits to all residents.

**4. Delivery, servicing and waste management trips are rising across London in line with increased housing and business activity. Do you think it is fair to extend off-peak delivery times to help manage congestion and highway safety?**

Not Sure

Overall we support attempts to better manage delivery, servicing and waste management trips. We support attempts to encourage “click and collect”, last-mile delivery by cargo-bicycle, consolidation, the TfL Freight Operator Recognition Scheme, and requirements for on-site servicing and delivery in new developments, and fiscal measures such as a workplace parking levy.

We would like to clarify that we would express no absolute preference for last mile bicycle delivery over traffic reduction measures such as click and collect, providing the click and collect locations are of sufficient density to encourage collection via walking or cycling.

Questions 5-10 can be answered from “Strongly Agree” to “Strongly Disagree”.

**5. Do you agree with the Council introducing short stay on-street parking measures in town centres to encourage a more frequent turn-over of spaces?**

Strongly agree

We agree that evidence shows that visitors to town centres arriving by bicycle are likely to visit frequently, spending a cumulatively large amount (p7). Encouraging the frequent turnover of spaces should include the increased provision of convenient cycle parking, including small numbers of Sheffield or M-stand cycle parking installed at multiple points along high streets, larger volumes of cycle parking and supporting services in cycle “hubs”, and the expansion of Cycle Hire through the borough. A quantitative target would be extending the aim for parking space occupation rates of 85% (p13) to cycle parking, and so expanding cycle parking or clearing away abandoned bikes where occupation is over 85%.

Studies of high streets and town centres indicate that less traffic, less air pollution, and more green and public space for non-transport uses are some of visitors’, residents and employers highest priorities for how to improve their town centres, far above more or easier parking. Any measures to introduce short-stay on-street parking should be integrated within a wider strategy encouraging public transport, walking and cycling to town centres. We note that Southwark charges cafes £83/year per square metre for pavement table & chair licence, whilst a typical car is 8sqm so would be £664. We argue that any attempt to adjust parking pricing in town centres to meet the 85% occupation rate should seek to ensure that parking generates, at minimum, direct and indirect benefits (net) that equal or exceed the potential benefits of converting that parking to other uses. These indirect benefits should include public health, policing and environmental or flooding/drainage (etc), not only transport-focused costs such as maintenance and civil enforcement.

For more information see the Cycling UK briefing “Cycling and the Economy”, TfL’s “Town Centres” reports, and the GLA’s “Economic Evidence Base to support the London Plan, the Transport Strategy and the Economic Development Strategy” (2010).

**6. How do you feel about Southwark Council trialling temporary kerbside uses such as "parklets" (mini parks), seating and planting?**

Strongly agree

Parklets, if designed and located appropriately, can have a positive influence on road safety, traffic calming, air pollution and encouraging safe and relaxed streets, all of which are of direct benefit to cycling. We would particularly support measures comparable to those proposed in Hackney, which incorporate bicycle parking as part of the parklet design. http://www.eastlondonlines.co.uk/2015/03/new-pit-stop-for-cyclists-in-gear-for-installation/

In the context of our response to question 2 (reproduced below), we support not only the installation of parklets at the road side, but also the use of parklets to filter roads and prevent through-traffic by motorised vehicles, in order to create streets that are “easy to cross”, “not to noisy”, have “clean air” and in which people from all walks of life “choose to walk and cycle” (p4), particularly around schools.

We support the strategy’s concerns that road usage is changing due to the growth of deliveries from online shopping, the growth of digital navigation (sat-nav) routing inappropriate volumes of traffic down residential streets, and the growth of minicab-apps such as Uber. In this context, we would argue that many of the kerbside strategy’s goals cannot be achieved through kerbside measures alone. To produce streets that are “easy to cross”, “not to noisy”, have “clean air” and in which people from all walks of life “choose to walk and cycle” (p4), particularly around schools, we argue that Southwark will need to more widely install measures preventing through-traffic by motorised vehicles (filtered permeability), whether by physical filtering (e.g. bollards) or digital filtering (e.g. geofencing, ANPR enforcement of Heavy Goods Vehicle restrictions).

**7. Do you think that more plants and trees in the kerbside could improve the attractiveness of a street and help address poor local air quality and drainage?**

Strongly agree

Kerbside plants and trees, if located and maintained appropriately, can have a positive influence on road safety, traffic calming, air pollution, encouraging safe and relaxed streets, and drainage, all of which are of direct benefit to cycling.

In the context of our response to question 2 (reproduced below), we support not only the installation of more plants and trees at the road side, but also the use of planting to filter roads and prevent through-traffic by motorised vehicles, in order to create streets that are “easy to cross”, “not to noisy”, have “clean air” and in which people from all walks of life “choose to walk and cycle” (p4), particularly around schools.

We support the strategy’s concerns that road usage is changing due to the growth of deliveries from online shopping, the growth of digital navigation (sat-nav) routing inappropriate volumes of traffic down residential streets, and the growth of minicab-apps such as Uber. In this context, we would argue that many of the kerbside strategy’s goals cannot be achieved through kerbside measures alone. To produce streets that are “easy to cross”, “not to noisy”, have “clean air” and in which people from all walks of life “choose to walk and cycle” (p4), particularly around schools, we argue that Southwark will need to more widely install measures preventing through-traffic by motorised vehicles (filtered permeability), whether by physical filtering (e.g. bollards) or digital filtering (e.g. geofencing, ANPR enforcement of Heavy Goods Vehicle restrictions).

**8. How do you feel about more controlled parking zones in Southwark, which prioritise on-street parking for residents, help prevent unsafe parking and make it easier for people walking and cycling to see traffic?**

Strongly agree

We support controlled parking zones as a method of increasing safety and visibility for walking and cycling, preventing unsafe car parking, and of increasing the amount of space available for cycle infrastructure, including cycle parking.

Previously implemented controlled parking zones indicate that many of the parked cars in Southwark are not parked by local residents. As such, we do not oppose car parking in principle, but we believe that controlled parking zones are one of the most effective and fair ways to balance the allocation of kerbside space in order to meet the needs of the 60% of Southwark households that do not own a car, and to support the many residents that own a car but also use other modes of transport, or support road safety improvements.

**9. Shared mobility transport systems (such as London cycle hire, car clubs, car pooling and sharing trips) are increasing, while private car ownership is declining. How do you feel about providing more space for shared rather than private vehicles?**

Strongly agree

As a cycling organisation we support shared mobility, and space for shared mobility, as a means of reducing demand for street space, particularly car parking spaces. We do support London cycle hire as a means of supporting cycling, but we see London cycle hire systems as one of many complementary measures to support cycling. Furthermore, we highlight that cycle hire is not going to cover Southwark in the short term, and that docking-station based schemes, such as the existing TfL scheme, can only support journeys where both the origin and destination points are within the cycle hire area.

Focusing on the kerbside, we support the expansion of the area covered by London cycle hire docking stations. We call on Southwark Council to extend the Santander Cycle Hire area further than Rotherhithe and Burgess Park, and to lobby the Mayor of London for funding to extend the scheme to at least New Cross Gate, Peckham and Camberwell/Denmark Hill London Overground stations’ catchment area, rather than Peckham or Queens Road. However, we support cycle hire as an addition to, rather than a replacement for, the borough-wide increased provision of cycle stands (e.g. Sheffield or M-stands), secure cycle lockers, and bike hangars.

We support space for shared motorised mobility, such as car clubs, as a method of reducing demand for car parking spaces and so of increasing safety and visibility for walking and cycling, preventing unsafe car parking, and of increasing the amount of space available for cycle infrastructure, including cycle parking. Shared mobility is another effective and fair way to balance the allocation of kerbside space in order to meet the needs of the 40% of Southwark households that do not own a car, and to support the many residents that own a car but also want to use other modes of transport.

**10. Please let us know in which order you would prioritise the following interventions on the kerbside:**

Highway Safety (1)

Pedestrian improvements for all ages and abilities (3)

Cycle improvements (2)

Public transport & shared mobility options (5)

Delivery & servicing (8)

Street trees / green infrastructure (4)

Parking allocation priority on residential streets (7)

Parking allocation priority in town centres (6)

1. February 2017 draft of Kerbside Strategy released for Public Consultation.

https://consultations.southwark.gov.uk/environment-leisure/kerbside-strategy/consult\_view/?utm\_name= [↑](#footnote-ref-1)