

New Southwark Plan Proposed Submission Version Consultation Response from Southwark Cyclists

Name: Ralph Smyth, on behalf of Southwark Cyclists

Southwark Cyclists, c/o London Cycling Campaign, Unit 201, Metropolitan Wharf, 70 Wapping Wall, London E1W 3SS

Email: pedal@runbox.com and southwark@lcc.org.uk

I can confirm that we are seeking changes and that I would like to appear at the Examination in Public

Is the Local Plan Legal?

The NSP has failed to have regard in any way to the following:

1. Network Management Duty contained in section 1 of the Traffic Management Act 2004, regarding the need to plan for future changes in traffic, which includes pedestrians. Statutory guidance confirms this duty applies to planning authorities. The failure to plan for more cycling and walking in line with new ambitions set by the Mayor (see below) is a particularly critical omission in town centres like Peckham and London Bridge, where the public realm is already very constrained.
2. Planning Practice Guidance on Transport Evidence Bases (PPG TEB) published in 2014 by the then Department of Communities & Local Government.
3. Local Cycling and Walking Infrastructure Plan technical guidance (LCWIP) published in 2017 by the Department for Transport (DfT) following the enactment of the Infrastructure Act 2015.
4. Draft Mayor's Transport Strategy (MTS) published in 2017, which adds significantly to the evidence base, radically changes policy and includes new specific route proposals in Southwark, such as east-west cycle routes.
5. Draft New London Plan (NLP), which is currently being consulted upon.

As a result Southwark Cyclists do not believe that the New Southwark Plan (NSP) is legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 or indeed that Southwark can reasonably or lawfully believe the NSP is ready to be submitted to an inspector. We are particularly concerned that Southwark has failed to have any regard to the PPG TEB requirements, which was published shortly before the first consultation on the NSP, despite having flagged this in every opportunity for consultation.

Moreover the radical policy shift in ‘Healthy Streets Approach’ contained in the draft MTS and NLP now makes Southwark’s reliance on a 2009 transport strategy as its transport evidence base completely untenable. We make suggestions below about improved wording without prejudice to our assertion that a fundamental refresh of the transport evidence base and generation of options is required, for the NSP to be made legal and sound.

Is the Local Plan Sound?

TOPIC Policy Number + Name	Test of soundness	OBJECTION / TEST OF SOUNDNESS
IP1: Infrastructure	Not effective Not consistent Not justified Not positively prepared	<p>NPPF para 162 (infrastructure) requires ‘assess the quality and capacity of infrastructure for transport... and its ability to meet forecast demands’. There has been no assessment of cycling and walking infrastructure and there is no classification of transport infrastructure as critical, necessary or desirable. This is particularly important in light of the financial deficit and resulting pause on spending announced by TfL in February 2018 that can be expected to impact on grants to boroughs. According to the PPG TEB, funding detail is particularly important for first five years of a plan’s currency but the NSP lacks detail.</p> <p>Active travel infrastructure is often completed last, meaning that occupants of new developments start off using less sustainable modes of travel.</p> <p>In order to make this policy sound, classify infrastructure according to need and add <u>‘Developments must provide cycling and walking infrastructure at an early stage, so that occupants can adopt healthy travel patterns as soon as they move in.’</u></p>
IP5: Monitoring Development / Annex 5 Plan Monitoring Targets	Not effective Not consistent	This policy is not effective as the monitoring over relies on subjective judgements by Southwark staff rather than objective criteria, is not consistent with the National Planning Policy Framework (NPPF), draft MTS and NLP. While NPPF paragraph 35 requires consideration of ‘the needs of people with disabilities by all modes of transport’, only monitoring of disabled drivers is proposed. In addition it is flawed, for example SP6: Cleaner, greener, safer fails to have any monitoring of air quality while the

		<p>monitoring indicator P54 it refers to in fact has no indicator proposed.</p> <p>In order to be sound, the following changes to Annex 5 are suggested:</p> <ul style="list-style-type: none"> ● IP1: Infrastructure - separate monitoring of implementation of infrastructure that is critical, necessary or desirable. ● SP5: Healthy, active lives - a new indicator for proportion of residents meeting weekly targets for physical activity is required. Accessibility of rail stations, i.e. for wheelchair users and disabled cyclists, should be measured in addition to disabled parking. ● SP6: Cleaner, greener, safer should refer to monitoring of Green Infrastructure (P58) and air quality (P66). ● P42: Healthy developments should include results of Health Impact Assessments and active travel modal share for new developments. ● P46: Public transport should include monitoring of bus priority, such as bus and cycle gates. Failure to prioritise sustainable travel modes may lead to further bus cuts and impacts on future PTAL levels. ● P47: Highways impacts should include monitoring of motor traffic levels against borough reduction targets and against far stricter checklists of requirements. ● P48: Walking should measure quality of new routes not just quantity, such as through the Pedestrian Environment Review System. ● P50: Cycling should measure quality of new routes not just quantity, specifically the proportion of routes meeting London Cycling Design Standards. ● P66: Air Quality should measure number of developments improving air quality.
<p>SP3: Best start in life</p>	<p>Not positively prepared</p>	<p>The NSP is not positively prepared in that it fails to recognise the critical need to increase opportunity for Southwark’s children to be able to travel independently and to integrate physical activity into their daily lives through playing, walking and cycling, in order to reduce health inequalities. Paragraph 35 of the NPPF promotes the designation of Home Zones to reduce conflict, for example.</p>

		To make this policy sound an extra point could be added: <u>'8 Reducing road danger to make more of our streets safe for children to use unaccompanied from the age of 8.'</u>
SP5 Healthy, active lives	Not positively prepared	<p>The policy would fail to deliver a cycle network that is suitable for all ages, in order to reduce health inequalities between ages: young adults in Southwark are already relatively healthy compared to the UK population, while older and young people have higher than children are not.</p> <p>Cycling is suitable for longer trips, such as commutes and also as part of a longer multi-modal journey. Increasing green spaces and greening walking and cycling routes has been shown to increase physical activity.</p> <p>To make this policy sound, the following changes should be including:</p> <p>6 Delivering <u>world class conditions for walking and cycling, including a comprehensive safer cycling network that is convenient and safe to use from the age of 8 to 80;</u> and</p> <p>7 Improving <u>and extending our network of green spaces;</u></p> <p>9 Introducing the concept of active design which, among other things, makes using the stairs an attractive alternative to using lifts and encourages <u>utility cycling</u> the use of bicycles to local trips.</p>
SP6 Cleaner, greener, safer	Not consistent	<p>The draft NLP and MTS highlight the importance of reducing motor traffic, in order to reduce congestion, air pollution (such as particulates from tyre and brake wear) and improve conditions for active travel.</p> <p>To make the policy sound add the following <u>'3 Reducing motor traffic'</u></p>
P11: Design of places	Not consistent	<p>The draft NLP and MTS stress the need to make driving less attractive to reduce private motor vehicle travel. By contrast this policy calls for the movement of vehicular traffic to be eased.</p> <p>To make the policy sound, add a reference to <u>'the Mayor's Healthy Streets Approach'</u> and remove the words 'and vehicular traffic.'</p>

P12: Design quality	Not consistent	<p>The draft NLP and MTS stress the need to design streets to be adaptable and improve public realm. PPG Reference ID: 26-001-20140306 requires design to be adaptable and this is especially important for public realm in Southwark due to expected increases in walking and cycling over the lifetime of developments.</p> <p>To make the policy sound a reference to adaptability is required In addition a new policy is needed for the public realm to comply with the requirements of the draft NLP.</p>
P23: Education Places	Not consistent Not positively prepared	<p>The need to encourage physically active travel to school is recognised across national and Londonwide policy. Simply encouraging safe travel, as this policy does, can lead to schools hindering healthy travel choices, such as by prioritising cars over cycling.</p> <p>To make this policy sound suggest rewording it to: ‘and support safe, <u>healthy</u> travel by pupils.’</p>
P42: Healthy developments	Not consistent Not positively prepared	<p>Despite the draft MTS and NLP setting out policy on managing health impacts from transport, whether negative, such as air pollution, or positive, such as physical activity, this policy fails to reflect them by not mentioning transport at all. This is also likely to lead to breaches of Southwark’s public health duties pursuant to the Health and Social Care Act 2012.</p> <p>In order to make this policy sound, add the following: <u>Health Impact Assessments should be carried out for major development proposals:</u></p> <p><u>Development proposals should:</u></p> <ul style="list-style-type: none"> • <u>demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.</u> • <u>reduce the dominance of motor vehicles on London’s streets whether stationary or moving.</u> • <u>be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.</u>

<p>P47: Highways Impacts</p>	<p>Not justified</p> <p>Not consistent</p> <p>Not effective</p> <p>Not planned positively</p>	<p>This policy is not based on up-to-date evidence (indeed it is a decade old), conflicts with Londonwide policy to reduce the dominance of motor vehicles, lacks objective standards (such as for HGV safety or indeed thresholds for requiring Travel Plans) to make it effective and is not planned positively to reduce motor traffic. PPG requires a full Transport Assessment, which ‘should ideally cover the period of the Local Plan, taking into account all the changes and improvements in, for example, technology and behaviour that is likely to happen in that time.’ (Reference ID: 54-011-2014101).</p> <p>To make this policy sound suggest broadening it to ‘Transport and Development’ and rewording it as set out below. A new evidence base complying with the PPG TEB requirements, borough traffic reduction targets and development thresholds, such as for when Travel Plans should be produced, are also required.</p> <p><u>A. New development must address its transport impacts in a sustainable manner and in accordance with best practice.</u></p> <p><u>B. Any significant negative impact on the operation of transport infrastructure, must be satisfactorily mitigated. Major development proposals are required to include the submission of either a Transport Assessment and Travel Plan, or a Transport Statement and Local Level Travel Plan, in accordance with the London Borough of Southwark thresholds.</u></p> <p><u>C. New development will only be permitted where it :</u></p> <p><u>i. Reduces the need to travel and encourages high-density and high-trip generating development around transport nodes and highly accessible areas.</u></p> <p><u>ii. Integrates land use and transport and will encourage mixed use developments which support compact growth and regeneration.</u></p> <p><u>iii. Minimise the demand for private car trips, including tax and Private Hire Vehicles, and van deliveries.</u></p> <p><u>iv. Fully mitigates any adverse impacts upon the capacity of transport infrastructure, including pavements and other walking routes, cycle routes, public transport and roads.</u></p> <p><u>v. The transport and environmental impacts of development construction must be minimised and mitigated through Constructions and Logistics Plans (CLPs) incorporating adherence to the</u></p>
-------------------------------------	---	---

		<p><u>Construction and Logistics Community Safety Scheme (CLOCS) and the highest level of Freight Operator Recognition Scheme (FORS) accreditation. On-site machinery and vehicles used should comply with industry best-practice emission standards contributing to the Council's air quality objectives.</u></p> <p><u>vi. Assesses the ongoing freight impact of the development and minimises and mitigates the impacts of this on the transport system through Delivery and Servicing Plans (DSPs) including references to use of low-emission, consolidation and sustainable last mile delivery vehicles.</u></p>
P48: Walking	<p>Not justified</p> <p>Not positively prepared</p> <p>Not consistent</p>	<p>There is no up-to-date evidence base for walking, in particular information about the capacity of pavements to cope with increased flows. There is no 'Southwark's walking strategy', simply a demand study. The draft NLP and MTS have changed the policy context and require higher standards.</p> <p>To be made sound, a new evidence base and new policy are needed:</p> <p><u>New development will only be permitted where it:</u></p> <p><u>i. Improves the pedestrian environment, in line with TfL street types, such as through creation of Home Zones.</u></p> <p><u>ii. contributes towards achieving a world class public realm linking the site to transport infrastructure as well as facilities and amenities including the provision of high quality safe road crossings where needed, seating, signage and increased tree and vegetation coverage.</u></p> <p><u>iii. Is permeable - easy and safe to walk through - and adequately lit:</u></p> <p><u>iv. Provides high quality footways and footpaths that are wide enough for the number of people expected to use them and designed to be suitable for vulnerable road users including older people and people with disabilities.</u></p> <p><u>v. Contributes towards improved wayfinding including signposted links to key infrastructure, transport nodes, green spaces and Thames Path where appropriate.</u></p>
P50: Cycling	<p>Not justified</p> <p>Not positively</p>	<p>The evidence base is not up-to-date as the Southwark Cycling Strategy is not current, was only ever intended to cover a period far shorter than the NSP and has already been shown to be unambitious</p>

	<p>prepared</p> <p>Not consistent</p> <p>Not effective</p>	<p>as cycling is growing faster than its targets despite a failure by Southwark to deliver infrastructure such as the Spine.</p> <p>The draft MTS has more ambitious targets, additional routes and better cycle parking standards than the NSP.</p> <p>In order to be sound an updated, longer-term evidence base is needed for cycling. In addition to the new policy below, Annex 1 on cycle parking should be increased to at least draft MTS standards, with minimum of 2 spaces required for all developments.</p> <p><u>C. Development will only be permitted where it:</u></p> <p><u>i. Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes for all, in line or exceeding London Cycle Design Standards.</u></p> <p><u>ii. Contributes to a world class public realm which encourages cycling wherever possible.</u></p> <p><u>iii. Provides cycle parking for building users and visitors to the development in accordance with Southwark’s cycle parking standards (see below). Cycle parking shall be accessible, convenient, weatherproof, secure and include an adequate level of parking suitable for accessible bicycles, tricycles and cargo bikes.</u></p> <p><u>iv. Makes provision for high quality facilities that promote cycle usage including workplace showers, changing room and lockers. The provision should be proportionate to the scale of development and cycle parking provided.</u></p> <p><u>v. Provides fully accessible links to public transport nodes as well as facilities and amenities.</u></p> <p><u>vi. Contributes towards improved wayfinding.</u></p> <p><u>vii. Promotes and contributes towards the introduction and expansion of cycle hire facilities and services</u></p>
<p>P51: Transport Infrastructure Improvements</p>	<p>Not justified</p>	<p>There is no current transport evidence base for transport infrastructure, in particular the bus network or freight needs, or no clarity about what the ‘adopted’ cycle network is.</p>

	<p>Not positively prepared</p> <p>Not effective</p>	<p>In order to protect the bus network from further cuts, beyond that recently suffered by the RV1, for example, bus priority measures, similar to the bus & cycle only gate implemented at Bank in the City of London, need to be considered to maintain the economic viability of providing frequent bus services, whether in town centres such as London Bridge or residential routes such as the P13 through Bellenden. These would have an impact on capacity of the road network to cater for motor traffic for developments.</p> <p>Freight consolidation hubs should be identified, including a local network suitable to enable high demand locations such as town centres to be served by electric freight cycles.</p> <p>To make this policy sound, an evidence base for freight transport and locations for bus & cycle gates is needed. Additional wording and detail should be added to the policy covering <u>the proposed cycling and walking network, cycle hire, freight consolidation and bus priority</u></p>
<p>P52: Car Parking</p>	<p>Not consistent</p> <p>Not positively prepared</p>	<p>The car parking standards in the NSP are not consistent with those in the draft NLP or, for example the goal of ‘rapid turnover’ (in other words higher car traffic volumes), the Healthy Streets Approach in the draft MTS. In addition the NSP policy is inconsistent with the Southwark Kerbside Strategy in its failure to recognise flexizone car sharing.</p> <p>Car parking standards should be revised to be stricter than in the draft MTS, something that the draft expressly supports boroughs doing, due to Southwark’s greater local needs to reduce congestion, air pollution and increase space for housing and viability for social housing (by reducing cost for developers of car parking). Car Free Development with extremely limited exceptions should be the rule, in line with policy in the London Boroughs of Camden and Hackney that face similar challenges and contexts.</p> <p>In order to make the policy sound, the following alternative text is suggested. <u>Parking and Car Free Development</u> <u>All new developments in the Borough must be car-free with on site parking limited to:</u></p>

		<p><u>i. Wheel chair accessible parking which is required to be provided in accordance with best practice standards, as set out in the London Plan</u></p> <p><u>ii. Essential operational or servicing needs as justified through a Transport Assessment</u></p> <p><u>A. The Council will not issue on-street parking permits in connection with new residential developments within Controlled Parking Zones. Returning residents within an Estate Regeneration scheme will be subject to the eligibility criteria as set out in the scheme’s legal agreement.</u></p> <p><u>B. Proposals for the redevelopment of existing car parks for alternative uses will be supported and the removal of boundary treatments and gardens to provide vehicle crossovers and on-site parking will be resisted.</u></p> <p><u>C. New development must incorporate designated spaces for deliveries within the boundaries of the development and provide Delivery and Servicing Plans which encourage provision for ultra low-emission consolidation and last mile delivery modes.</u></p> <p><u>D. A minimum of one fifth of all off-street parking places created need to be equipped with electric vehicle charging infrastructure in line with the London Plan. Facilities for charging electric cycles should also be considered. Contributions will also be required for on-street provision of electric vehicle and other low emission vehicle infrastructure.</u></p> <p><u>E. All major residential developments will be required to contribute towards the expansion of the local car club network.</u></p> <p><u>F. Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be refused. Proposals for the redevelopment of existing car parks for a different use shall be subject to the car-free and Transport Assessment need requirements within this policy.</u></p>
<p>P58: Green Infrastructure</p>	<p>Not justified Not positively prepared Not consistent Not effective</p>	<p>There are no proposals setting out how green spaces could be improved or linked with green chains, in line with national and London policy(e.g. G1 in draft NLP) to integrate green areas, in order to improve connectivity for nature as well as improve the attractiveness of walking and cycling. The failure to consider space requirements for additional green infrastructure, such as by removing car parking and space for motor vehicles, and the locations where doing so would be most critical, means the plan risks being ineffective.</p>

		<p>In order to make this policy sound a map of potential green chains should be included and the following new policy inserted:</p> <p><u>A. All new development should enhance the network of green infrastructure and green chains across the borough and seek to improve access to open space, particularly in areas of deficiency.</u></p> <p><u>B. Development involving the loss of designated open space will not be permitted unless:</u></p> <p><u>i. There is compensatory contiguous replacement of better or equivalent quantity and quality of public open space and setting including facilities to enhance or diversify people’s experience of the open space; and</u></p> <p><u>ii. Replacement is in a location with better or equivalent access by walking, cycling or public transport; and</u></p> <p><u>iii. The quality of the remaining and replacement open space is not eroded by the proposed development; and</u></p> <p><u>iv. The community benefit of the proposed development significantly and demonstrably outweighs the harm caused by the loss of the open space.</u></p> <p><u>All new development adjacent to existing Green Chains and Green Corridors must be developed in a way that contributes towards the green infrastructure network. In the areas of potential new Green Chains identified on the map, financial contributions may be sought to develop new Green Chains in the future.</u></p>
<p>Area Visions</p>	<p>Not justified Not consistent Not positively prepared</p>	<p>The Area Visions only showed existing cycle routes, plus the Spine and extension of the Surrey Canal Path. This left out almost all the routes proposed in the 2015 Southwark Cycling Strategy. The draft MTS and NLP require consideration of future walking and cycling infrastructure in an integrated fashion as does national planning policy and the LCWIP guidance.</p> <p>The TfL Street Type hierarchy should have been incorporated into the evidence base for the Area Visions. So should a network of proposed walking routes and areas, such as Peckham, that have been identified by TfL in the draft MTS as having potential for significant increases in walking. Likewise proposed cycle routes - not limited to those in the Southwark Cycling Strategy but also including those in the draft MTS - desire lines and areas of high cycling growth potential should have</p>

		<p>legible green link for cycling and walking between Chadwick and Bournemouth Road retained</p> <ul style="list-style-type: none">• Direct access from Hanover Park through NSP75 (Aylesham Centre) or via McKerrell Road for buses accessing and leaving the Peckham Bus Station.
--	--	---