

E&C SPD – Response from Southwark Living Streets.

Introduction

- Southwark Living Streets is a fully constituted community group which seeks to make life in Southwark better for those on foot. We meet monthly and have an average attendance of around 15 at our meetings.
- Our group keeps in touch via an email network that consists of more than 80 activists.
- Our web-site address is: <http://southwarklivingstreets.org.uk/>
- This response comprises the comments of all of the members of the group.

Overall Comments.

- There are many good things that we have seen in the Elephant and Castle Supplementary Planning Document. As well as the aspirations to make this an excellent area in terms of pedestrian and cycle connectivity and making links between the array of open/green spaces in the area, we are really pleased with the bold vision to return St Georges Road to two-way operation and the desire to create a public transport corridor on London Road. While we welcome the desire to make improvements to the area around the northern roundabout, we have to say that the plans published to date are unambitious and that problems with TfL roads throughout the area remain a major barrier to safe and widespread pedestrian and cycle movement north-south through the area. **We feel that a clear statement needs to be made as to how the smaller public realm improvements will be funded.** There appears to be an extremely heavy reliance on providing funding for major TfL projects such as the escalators or more lifts at the Elephant and Castle and, although these are important, other improvements such as the delivery of improvements to the pedestrian infrastructure (such as green routes in West Walworth along the railway line) offer a greater impact on the lives of ordinary people who actually live throughout the Walworth area. It is vital that a credible and genuine means is found to deliver the projects that are outlined in the SPD and that these are not sidelined as mere aspirations to be delivered once the TfL projects have been resourced or after some Projectbank schemes have been financed.
- **20 mph.** 20 mph speed limits are vital to liveability and sustainability and we can see no mention of 20mph speed limits in the SPD. We feel that given that it is official Council policy (at least on its own roads) to limit vehicle speeds to 20mph then it is important that this is stated in the SPD as this will drive the design of streets in the future and will come to include the more main arterial roads. We note too that recent DfT guidance indicates that for cyclists the most significant safety improvement is lower speeds.
<http://assets.dft.gov.uk/publications/infrastructure-and-cyclist->

[safety/infrastructure-and-cyclist-safety.pdf](#) Although we understand the difficulties we would strongly press for 20mph speed limits on the TLRN roads in our area. We already know that the Elephant and Castle northern roundabout is the most dangerous junction in the whole of London; this week a pedestrian has been killed on the New Kent Road. 20mph speed limits can begin to address some of these dangers.

- **Green Routes.** These are clearly an important element in the SPD. They should, we feel, be identified as such in Theme 4 (section 2.3.16), with a description of their character. We suggest the following draft:
“Walking and cycling. These modes are key to the sustainable future envisaged in this SPD. They will be facilitated and encouraged by the network of green routes referred to throughout the SPD. The principal characteristics of these green routes will be:
 - they will link up the many large and small parks and other public green spaces in the opportunity area;
 - they will follow the lines of quiet streets, which will wherever feasible be reconfigured to improve conditions for walking and cycling;
 - wherever possible they will include off-road sections designed to accommodate pedestrians and cyclists enabled to use the routes responsibly and without conflict;
 - the links provided by green routes between green spaces will improve biodiversity by enabling wildlife to move between these spaces.
- **Provision of green/open space.** We feel that there are opportunities to increase the amount of green space or at the very least to increase the perception of the amount of green space through making our streets greener. We have seen benefits from this approach in a number of areas in Walworth in recent years such as the HomeZone in Sutherland Square, the Salisbury Road Streets For People scheme, the greening of the environment around the Pullens Estate and most recently the pedestrianisation of Sturgeon Rd SE17. The approach in all of these locations has been at the very least to reduce road capacity and in reality to replace some capacity with pedestrianisation and greening the environment through tree-planting etc. We have seen in previous work such as the Southwark Living Streets Green Links scheme that, as in other parts of Southwark, there are numerous roads where (owing to relatively low and currently declining levels of car ownership) there is little vehicular movement and levels of car parking are low that there are opportunities to begin to remove road capacity and replace it with pedestrianisation/greening. We understand that the costs of this have to date been relatively high but we feel that innovative approaches could be used to bring down costs significantly. In this way through creating green links and through the pedestrianisation of roads and streets we have the chance actually to increase the level of green space provision in the SPD area. All of this is particularly important in relation to SPD 18: open spaces and in the

light of the astonishingly low levels of green space in the local wards as is outlined in the table below.

Ward Name	% Greenspace	% Greenspace Ranking (out of 10,654 English wards)
Cathedrals	13.2%	10,473
East Walworth	10.8%	10,529
Faraday	5.5%	10,614
Newington	4.2%	10,632
Chaucer	3.7%	10,638
Southwark Average	16.2%	

Source : <http://cresh.org.uk/cresh-themes/green-spaces-and-health/ward-level-green-space-estimates/>

- **Estate cycle parking.** There is considerable demand on local estates for secure cycle parking. This is being accommodated on some estates such as the Pullens but we know from recent meetings that for other estates such as the Rockingham Estate there is still considerable demand for increased provision.

Detailed Comments

- Page 21 3.1.4. **The Vision for the Elephant and Castle opportunity area.** We very much endorse the SPD vision for the Elephant and Castle area in this section. We note the statement concerning the provision of a minimum level of car parking and given the low and declining levels of car ownership in the area, we feel very strongly that the Council should retain its vision of zero car parking in developments. PTAL levels in this area are particularly high and many people in the local community have bought into a vision for the local area that represents a dramatic change from the traditional view of the Elephant. Many feel that both sustainable living and sustainable forms of transport should be prioritised as part of the vision. We question strongly the Lend Lease insistence on 25% parking for developments as a baseline for the future and feel that with a provision for disabled parking of up to 10% and a further provision of 5% for car clubs, the need for private vehicle usage should be minimal especially if relationships can be created with car rental companies that would allow longer term rental (e.g. over a weekend) than is typical with organisations such as Zipcar where vehicles are charged by the hour. We would also like to understand to what degree the parking that has been created in places like the Printworks on Amelia Street has in fact been taken up. We suspect that levels of usage of these spaces are relatively low.

- The table below highlights just how low **car ownership by household** now is in the middle part of the borough and the fact that it is declining fastest in those areas where it is already lowest.

Electoral Ward	% Ownership- 2011	% Ownership- 2010	% Ownership- 2009	% Change (09 to 11)
East Walworth	28.4%	30.7%	33.4%	-5.1%
Chaucer	30.0%	31.1%	33.1%	-3.1%
Faraday	32.3%	34.0%	36.3%	-4.0%
Cathedrals	33.6%	35.1%	35.5%	-1.8%
Newington	34.5%	34.7%	35.9%	-1.4%
Grange	37.0%	37.7%	38.8%	-1.9%
Camberwell Green	37.3%	39.1%	39.7%	-2.4%
Livesey	38.3%	38.9%	40.7%	-2.4%
Rotherhithe	42.8%	44.2%	44.3%	-1.5%
Brunswick Park	43.0%	43.9%	47.2%	-4.2%
Peckham	43.3%	44.1%	46.7%	-3.4%
Riverside	45.0%	46.0%	45.8%	-0.9%
South Bermondsey	45.3%	44.3%	44.4%	0.9%
South Camberwell	49.6%	50.5%	50.1%	-0.5%
The Lane	52.3%	53.9%	54.3%	-2.0%
Nunhead	52.7%	52.5%	53.9%	-1.2%
Surrey Docks	56.6%	56.6%	56.8%	-0.2%
East Dulwich	64.6%	65.6%	65.1%	-0.5%
Peckham Rye	66.0%	66.5%	67.4%	-1.4%
College	76.9%	78.1%	78.1%	-1.1%
Village	88.0%	87.2%	85.9%	2.1%
Total - Southwark	46.5%	47.4%	48.3%	-1.8%

- While we support many of the aspirations expressed in 3.1.4, we feel that, as with the Heygate regeneration, it would be helpful to express these aspirations in a short vision. What is described on page 21 is a series of attributes and targets rather than a vision against which these elements can be assessed. A vision thus expressed could then be included for example on the front of the document as an expression of the change residents and Southwark would like to see throughout the whole area. A theme that has emerged strongly in relation to the Heygate regeneration is one of greenness and many of the elements included in the SPD document are extremely progressive in this way. The potential to connect areas such as the Bankside Urban Forest and the green spaces of East Walworth into Burgess Park and thus encourage sustainable forms of transport would further support such a claim for the transformation of the local area. The promotion of smaller independent businesses could also then work well with this theme of greenness and sustainability. A retail offer that encouraged people both to walk and cycle and spend a far greater proportion of their income within Southwark and the local area again points to themes around sustainability.

- Page 24 Theme 5 2.3.17 We suggest the addition of a further bullet, reading “Utilise small open areas for green public seating and children’s play spaces, where the location warrants this treatment”
- Page 25 - 4.1.3; page 24 - 2.3.16. **The north end of the Walworth Rd** (north of Amelia St). We understand the desire to increase pedestrian movement between the Walworth Road shopping high street and the Elephant and Castle but do not believe this can be done purely by building retail to the eastern side of the Walworth Road. While pedestrian activity is vibrant south of the Browning St/Manor Place junction with the Walworth Rd, it falls away dramatically north of there and certainly north of the One-Stop Shop. The road has returned to being 4 lanes wide and has unattractive/intimidating/inactive frontages most notably the Met Police ballistics building north of The Tankard public house. The result of this is that very few people walk the short distance to the Elephant from Walworth – almost all hop on a bus. While the regeneration will hopefully be very successful at revitalising the eastern side of the road at this point, the character of the road itself needs to change. There have already been 2 fatal collisions involving pedestrians since the Walworth Rd Project was finished in this multi-lane section (one by Elephant Rd and one by Heygate St). We would very much hope that the Walworth Rd scheme can be finished off along the lines of the original project (principally by becoming 2 lanes wide) between Amelia St and the Elephant itself. We believe that the detailed diagrams and plans that were created by the Project Centre as part of the Walworth Road Project should still be available and that these can form the basis of plans for this northern section. Considerable modelling was undertaken at the time of the project to show the viability of single carriageway running on the Walworth Road and this has been proved to be successful since the project was finished a number of years ago. If adequate provision is made for bus stops then it should be possible to satisfy TfL requirements in terms of journey times with single carriageways in this northern section. **We feel that, given its significance, aspirations for connecting the Walworth Road shopping high street and the Elephant area through a transformed Northern Walworth Road should appear in theme 4 on page 24, section 2.3.16.**
- Page 37. SPD 11: Walking and cycling. We feel that a couple of other points should be made here:
 - **A clear statement concerning the aspiration of 20 mph speed limits is needed.**
 - **The need for major roads in the area to become less of a barrier to pedestrian and cycle movement. These roads would include the TLRN and major Borough roads such as the Walworth Road and Newington Causeway.**

- Page 39. We note that figure 11: existing and proposed cycle routes omits the planned cycle superhighway 6 (CS6) which will roughly follow the line of the 176 bus to Penge. We understand this is likely to start at or around Keyworth Street and follow the Walworth Road south towards Camberwell.
- Page 41. 4.4.6. The northern roundabout at the Elephant and Castle is currently the most dangerous single location in the whole of London for road casualties. While we understand the significance of removing subways and the creation of crossings on all of the principal arms of the roundabout, we feel that more is needed to humanise this area than appears currently in the proposals from TfL. A major problem is the sheer amount of carriageway and the consequences of this are high speeds through the area by motor vehicles (especially given their capacity for fast acceleration nowadays). **Far more work is needed both to reduce the capacity of the road layout and reduce speeds of motor vehicles.** We would of course propose the **adoption and enforcement of 20mph speed limits** in the area given that this is in reality a town centre with enormous numbers of pedestrian movements especially amongst people waiting for buses. But in addition more work is needed to **remove the wide lanes and high-capacity** that marks out the territory as being for motor vehicles and not people. Lessons also need to be learned from the changes to the southern roundabout where vehicle speeds remain high in spite of significant changes to the carriageway layout. More creativity and thought is also needed into the way that spaces are designed that have been created from carriageway. At present the public realm around the former southern roundabout has a bleak windswept and empty feel to it. **The SPD should refer to the need to create attractive places as well as reducing road capacity.**
- SPD 12. Parking. Section 4.4.8. Car ownership amongst existing residents is already low as has been noted but also is falling and falling at a faster rate in this area than in other parts of Southwark. Although East Walworth is an unusual ward owing to the absence now of people living on Heygate, private car ownership has fallen by over 5% in the last two years compared to the Southwark average of almost 2%. Car ownership levels in both East Walworth and Chaucer wards are now the lowest in Southwark at 28.4% and 30.0% of households respectively. We feel that this provides the Council with more grounds to resist higher levels of car parking on the Heygate estate as clearly the combination of the recession, the increasing presence of car clubs and the proximity to central London is ensuring a lower need for private motor vehicle ownership. Falling levels of car ownership provide the opportunity to reduce the amount of on-street car parking. Increasing cycle use, on the other hand, necessitates more cycle parking, both on and off street. On-street cycle parking can be provided in place of on-street vehicle parking, thus meeting twin objectives for cars and cycles. One car park space can accommodate ten cycles.

- SPD 15. Public realm. The good lighting referred to should be particularly designed for pedestrians and cyclists, with the use of **white light rather than orange light** and shorter lighting columns than used for motorised traffic, owing to the benefits for pedestrians and cyclists.
- SPD 20: S106 Planning obligations and community infrastructure Levy. While we support significant transport programmes, it is vital that the improvements throughout the SPD area are ring fenced. The danger is that economic benefits alone will be prioritised principally to the benefit of those passing through the area on public transport and making trips to the area from other areas in order to make use of the improved retail provision at the Elephant itself. It is important that local people also benefit from these changes in their daily lives and the improvements outlined in the rest of the SPD area are fundamental to that.

The Character Areas.

1. Central area.

- 5.1.8. Page 63. We strongly support the references to development providing active frontages where possible. While it is relatively easy to see how this can be done for retail it is important that it is considered in relation to the new leisure centre, the shopping centre itself and other public buildings such as the London College of Communication. For example with a leisure centre the cafe could be created on the ground floor with open views into St Mary's churchyard and the pedestrian and cycling routes that will run from the site of the former southern roundabout to cycle superhighway 5. Bus passengers waiting outside the shopping centre will have a far more pleasant experience if there are active uses at ground level nearby.
- SPD 22. Page 63. Given the reference of strengthening the links between the shopping centre and the Walworth Road, it may be appropriate to express the desire to finish the Walworth Road project in the northern section at this point.
- It is vital to stress the creation of safe and pleasant north-south crossings for pedestrians and cyclists to move from the Walworth area towards Borough and London Bridge.
- SPD 23: Built environment. It is not clear where the front of the shopping centre is. Assuming that it is the face of the shopping centre opposite the Tabernacle building, it will be important to design the proposed new civic space in a way that increases the space for bus passengers waiting in the area opposite the Tabernacle building.

2. Heygate Street.

- SPD 26: Transport and movement. As well as Harper Road and Falmouth Road, mention should also be made of Meadow Road owing to its connections with LCN 22. This will remain an important link to CS7 and other cycle routes to the north.
- We strongly agree that on-street car parking should be minimised and believe that streets can be made active without reliance on motor vehicles to be the source of that activity.
- SPD 27: Built environment. We strongly agree the courtyards should be at ground rather than podium level. It is understood that private space is needed for residents but given the extreme shortage of green space in the area, pleasant views of green space for those passing by are important and can add to the visual amenity of the development.
- SPD 28: Natural environment. Given the importance of creating links to the Bankside Urban Forest we feel that reference to that would be valuable in SPD 28. Although Balfour Street sits on the border of the SPD area we feel that some mention should be made of it as a green route and what the aspirations are for the links between the Phase 1 development and the existing homes and buildings that lie along that street.

3. Brandon Street.

- 5.3.8. Page 80. The need for clarity as to the purpose of and character of green routes is exemplified by the bullet point “to improve green routes to Burgess Park”. It is not clear at present in what way those links exist between, for example, Nursery Row Park and Burgess Park. A key element in the implementation of the SPD will be to create such links here and elsewhere in the opportunity area.
- SPD 31: Built form and public realm. We note the mention of the junction at Orb Street but feel that more needs to be made of this opportunity. The whole idea of green links/routes is to connect green spaces. We have already mentioned Balfour Street and its significance as a means of connecting Victory Park with routes to the south. It is a very short distance from the junction of Balfour Street and Rodney Road through to Nursery Row Park. While improvements to the junction at Orb Street can help, what is really needed is a strategy to connect the southern end of Balfour Street to Nursery Row Park to the benefit of pedestrians and cyclists. The creation of a strong green crossing at this point using planting, carriageway capacity reduction and public realm improvements immediately opens up a link between the Heygate estate and Nursery Row Park via Victory Park and Balfour Street.

4. Walworth Road.

- SPD 34: Transport and movement. Although opportunities do exist to improve pedestrian and cycle routes in terms of the links into the surrounding areas it is also vital that the improvements are made to the southern section of the Walworth Road. We know that casualties are weighted heavily nowadays towards main roads and there will be real value in completing the Walworth Road project in the area around the Gateway estate. This should be included in the SPD.
- It was originally intended (just as in the northern section north of Amelia Street) that the Walworth Road Project would in time remove the dual carriageway section south of Fielding Street which extends as far south as John Ruskin Street. It is important to return this section to single carriageway working (obviously with sufficient ample provision bus stops) and that this is included as part of the longer term plans for the Walworth Road. Those living on the Aylesbury Estate with its lower PTA L levels than other areas nearby will rely on both shops in this area and safe crossings to bus stops around the Gateway Estate in particular for journeys northwards. The public realm in this area currently presents a hostile environment with wide fast moving vehicles in this wide section of the Walworth Road. Reducing this to single carriageway will attract both pedestrians and cyclists and improve the economic vibrancy of this lower section of the Walworth Road. Oddly enough, narrowing the carriageway could in fact have benefits for traffic flow as vehicles do not speed up and slow down as they reach the narrower sections and pedestrians will have shorter distances to cross meaning that crossing times on the formal crossings can be reduced. **We would very much encourage this to be included in the SPD and also to be integrated into the plans for the Aylesbury Estate.**

5. Rail corridor.

- 5.5.17. Page 97. We are uncertain as to why Nursery Row Park has been referred to at this point.
- SPD 38: Transport and movement. At present, there are grim pedestrian links from the Newington Estate to the Walworth Rd along both Hampton St and Steedman St with narrow cluttered, broken and filthy pavements. There is an excess of carriageway; poor condition of the railway bridge. Many blank, threatening and unattractive frontages. Investment is needed in the quality of the walking and cycling links into the Newington Estate from the Walworth Rd along these streets. A statement is needed to ensure the s106 money from the developments in the area such as Alumno will be used to benefit these streets. A bold approach would be to develop them along HomeZone or DIY Streets principles where motor vehicles are very much subordinate to pedestrians and cyclists.

- SPD 39: Built form and public realm. We note with interest figure 31 and its indicative proposals for the rail corridor character area. We are particularly interested in the proposed pedestrian routes that run along both sides of the rail corridor. Given the high levels of commitment that will be needed to achieve the creation of these routes, **we feel that specific mention should be made of both of them under the heading of SPD 39.** There are some significant barriers to be overcome to open up these routes. On the west side real vision will be needed to create a link north-south between Penrose Street and Manor Place both through the current development site of the Manor Place Depot and then past the large brick building on Penrose St. North of Manor Place, real thought will need to be given to create links through the current site of the post office sorting depot and the light industrial unit immediately to the north. A route then exists north as far as the Newington estate boiler room but needs to be opened up and work needs to be done to make that feel a safe area for pedestrians/cyclists. On the eastern side the possibilities of a route are easier to envisage especially given the Alumno development on Hampton Street. These opportunities if realised are extremely exciting for the local area and deserve to be given higher prominence in the SPD document than they are given to date. The east-west route proposed through the current Kwik-Fit site will be of tremendous use too and again needs to be highlighted.

6. Pullens.

- While much of this area is attractive, certain parts remain neglected. Thought and mention needs to be given to Dante Road which is an extremely poor environment with large amounts of dead carriageway at present. Thought needs to be given as to how to reduce the excess road capacity of this street and how it can be made more attractive potentially through greening.
- Although figure 34 indicates a green route along Longville Road, more specific mention needs to be made of this as it will be only too easily forgotten unless specific attention is drawn to it. It has, however, significant appeal as a route for pedestrians and cyclists west towards Westminster along Brook Drive. It also has a potential role in linking up cycle/pedestrian routes that will be created alongside the leisure centre and St Mary's churchyard.

7. West Square.

- The creation of/permission for contraflow cycling along Geraldine Street would open up cycling routes in this area that can make use of Geraldine Mary Harmsworth Park.

8. Enterprise Quarter.

- SPD 50: Transport and movement. A clear statement needs to be made about the ambitions for Newington Causeway. At present as with many roads in the Elephant area Newington Causeway acts as a tremendous block to pedestrian and cycle movements owing to its motorway like appearance. Real investment is needed in this road in order to reduce capacity and vehicle speeds. At present what is a short walk from the Elephant to Borough tube and the River is made by very few pedestrians.
- SPD 51: Built environment. A clear statement needs to be made about active frontages on the east side of London Road. South of the Georgian terrace this is a particularly threatening and yet significant frontage principally owing to the bus stops that run the length of this road. The public realm strategies of LSBU need to focus on bringing the whole of this stretch back to life both by having active frontages at ground level and removing the valley that runs along the length of many of the buildings. Although this is backed up in 5.8.13 a clear statement along these lines is needed in SPD 51.

9. Rockingham.

- 5.9.4. We strongly support the call for public realm improvements on Falmouth Road. We feel this can become an important link for cyclists and pedestrians to the north.
- SPD 53: Land use. There is a clear community call for improvements to community facilities within the area. Residents on the Rockingham estate feel that they are neglected in local regeneration projects and that commitment to improve at the very least the community centre in the area needs to be made.

Page 53. The open space network.

- Some work is needed to connect a number of the maps that appear in this document. Our focus here is on figure 16 (the open space network), figure 12 (existing and proposed pedestrian routes) and figure 11 (existing and proposed cycle routes). Some work is needed to ensure that the pedestrian routes fit with the open spaces framework and the cycle network. At present there are issues with the open spaces framework owing to inconsistencies shown below:
 - in figure 22: indicative proposals for the Heygate Street character area. A green route is indicated along Heygate Street but this green route is absent from figure 16. In addition it needs to continue westwards along Steedman Street and into the Newington estate where it should link up with the green route that runs parallel to and south of Kennington Park Road.

- In figure 34: indicative proposals for the Pullen's character area. The green route along Amelia Street continues westwards across Penton Place into Berryfield Road. This is absent from figure 16 in the section west of Crampton Street. This is significant because at present the area in front of the small park that faces the Pullens buildings is a rat run (along Amelia St) and work is needed to make this a safe cycling and pedestrian route.
- We would very much propose a meeting that seeks to produce a coherent network that coordinates the links between these open spaces, cycling routes and pedestrian routes. This meeting could also discuss the nature of the green routes that are being proposed in the SPD, a draft on which we have suggested in our Introduction and Overall Comments; and could identify existing examples of green routes elsewhere in Southwark and in other places.

Appendix 2: Public realm strategy for the Enterprise Quarter.

- 1.13. Street improvements Newington Causeway. We feel a clear statement is needed as to the nature of the boulevard character and city scale hierarchy for Newington Causeway. More needs to be done with this street than is outlined in the design principles/proposals in 1.13.2. Although the footway needs to be improved and tree planting and lighting is important the core problem with this road is the sheer amount of carriageway capacity and the associated high vehicle speeds. Capacity is constrained further to the north on Borough High Street to a single carriageway and, given the existence of this carriageway reduction, there is no particular reason why the principles of the Walworth Road project should not be adopted and carriageway should be removed (while obviously bus stop provision and space needs to be retained).
- At the very least the central section of the road needs finally to be reclaimed as public realm. Paving or grassing it over and planting with trees would begin to give some sense of a boulevard. For vehicle drivers, the street should be designed to a maximum of 20mph. Newington Causeway should no longer be the utter barrier that it currently is to pedestrian movement between the Elephant and London Bridge.

Southwark Living Streets – 16th January 2012