Draft New Southwark Plan (NSP) – Response from Southwark Living Streets

Southwark Living Streets is a fully constituted community group with over 100 members in the borough. We campaign on behalf of those on foot and for improvements to the public realm that will encourage people to walk and pass time outside.

We would like to make the following points (in no order of priority) in relation to the draft NSP.

1. **Car Parking.** We would request that the most stringent criteria are adopted in relation to car parking in new residential developments. We note that the decline in private motor vehicle ownership has now been reversed in the year to March 2014 and more is needed to be done to discourage car ownership by the large numbers of new residents who are coming to live in the borough if we are fully to be a borough that encourages people to walk and cycle and use public transport. The creation of significant volumes of car parking in new developments is wasteful in terms of the costs of building the spaces required and a poor use of valuable land that could otherwise be available for housing or public realm improvements.

2. **The Role of Railway Viaducts.** We propose the inclusion of a wider policy about the opportunity for walking and cycling links and improved employment and economic activity offered by the railway viaducts which make their way across the borough. We strongly support DM22 and agree that any use should be compatible with any surrounding residential area in terms of the uses and hours that businesses will be operating.

3. **Pedestrian & Cycling Footbridge across the Thames.** We propose that the designation of the pedestrian/cycle bridge between the Rotherhithe Peninsula and Canary Wharf is included amongst the list of protected items of transport infrastructure. DM 16.1.6 on page 38 should make clear that this bridge is for foot and cycle use only.

4. **Green Links & Routes.** We have noted with interest the idea of the proposed cycling network being delivered via the Cycling Strategy being a sub-document to the New Southwark Plan. Given that we understand that the Walking Strategy will be worked on after the Cycling Strategy, we wondered if the Green Routes/Green Links network that is given some mention in the NSP, might form a sub-document in the Walking Strategy and similarly be referenced in the NSP.

   At its heart, the role of green links/routes is to create a traffic-free/lightly trafficked network of largely pedestrian (and leisure cycling) connections between green spaces and key amenities in Southwark; their role is to encourage active travel amongst all Southwark residents in a green mentally and physically health improving natural environment. They tie in really well with the spirit of the NSP but at present they are viewed very much as isolated elements/links. Developing them as a network (which is of course flexible in its nature) as part of the NSP would give their creation far more weight and bring to the fore issues of quality of life and active travel for new and existing residents as development occurs.
A great deal of work has been done on this already and includes:

- The original Green Links Network which was proposed in 2010 ([http://southwarklivingstreets.files.wordpress.com/2011/03/green-links-15apr10.pdf](http://southwarklivingstreets.files.wordpress.com/2011/03/green-links-15apr10.pdf))
- The green links network proposed across the E&W NP area which and the Connecting the Neighbourhood workshops which were recently held
- The work of the Bankside Urban Forest,
- Routes into Burgess Park from north and south as part of the Aylesbury redevelopment and the Elmington Regeneration
- The work on Lomond Grove as a link between Camberwell and Burgess Park.

We are really encouraged that the British Land development in Canada Water would deliver (in a far more bold way than had been envisaged) the Green Link 7.2 in the original Green Links Network report. In addition it ties in really well with Southwark’s potential and emerging link between Burgess Park and Southwark Park as part of an OKR AAP.

Finally such a network might provide a home/framework for the ideas that are now popping up all over the borough for Low Lines (most recently the Coal Line in Peckham) – see point 2 above.

Giving the Walking Strategy a focus of this sort might also bring the whole idea of walking in Southwark to be viewed in more comprehensive light and to give it a bolder and significant role in delivering physical health and a higher quality of life than it might otherwise have.
Finally we would suggest that any adoption by Southwark Council of the Green Links idea involves the Parks Department and Cemetery departments. Some of the links will involve parks and cemeteries that tend to be locked between certain hours. It would be useful get a reference in the plan to indicate that parks and cemetery managers have a responsibility to ensure that access through the area is guaranteed within agreed hours. Unless this is done, managers are likely to default to their priority of running the park or cemetery rather facilitating pedestrian movement around the borough.

5. Town Centres. We strongly support DM25 and the Town Centre First policy and the proposed move away from out of centre retail sites which offer both low density and car-centric usage.

In terms of retail densities, we notice that Lewisham Council has recently allowed "retail shed", Toys r Us at the Bell Green retail park. Southwark's draft plan indicates that they don't want to allow this sort of development but they may already have obligations to do so. In order to use space more efficiently, if buildings of this type do gain planning approval we would suggest that all such sheds should have a floor or more of Porta-a-Cabin type accommodation on top which could be let on fairly short tenancies. We understand that such "temporary" accommodation can be quite well insulated and designed (cf YMCA shipping container homes) and such a policy would ensure greater use for a site than low density retail.

6. Local Shopping Parades. We strongly support DM26 in relation to safeguarding and supporting local shops. We would propose that Southwark goes further and makes an assessment of the borough in terms of access to shops and services in terms of walking and cycling distance from them and seeks to ensure that support is given to locations where residential densities are high but there is a lack of local shops and services. An example of this might be the provision of retail facilities in and around the newly redeveloped Elmington Estate if distances prove too great for residents to reach the nearest facilities. The map below demonstrates how this analysis might be undertaken.
7. Cycle Parking. Although Cycle Parking standards are mentioned in DM15 – Walking and Cycling, we are concerned that at 15.1.5 mention is only made of this as “generous provision”. There is a danger that this represents an invitation to developers to negotiate something less, whereas the standards should be the absolute minima, not open to negotiation apart from the most exceptional circumstances. We would like to see more work on this and some quantification of this in relation to the highest possible reasonable levels of provision that will future proof cycle parking provision not only in new residential and office developments but also new and existing public and commercial facilities. We believe that Southwark’s Cycling Strategy will be effective to deliver a transformative increase in cycling demand in Southwark and, to support this, large volumes of cycle parking will be needed where people live and at their destinations. As an illustration, Southwark’s population will reach about 350,000 by the end of the plan period, with an aspiration for over 10% of people cycling after 2026. Each person will need at least two cycle parking spaces (home, workplace and amenities), so over 70,000 cycle parking spaces will be needed.

We suggest adding to 15.1.5: “avoiding danger and inconvenience to pedestrians, and in appropriate places located on carriageways rather than footways”

We would like to make the following more detailed comments on other sections:

• Definition of “development”. This should include developments of any scale (i.e. not be confined to developments above a certain number of units) both generally and in particular in the context of policies for car parking (DM 17 on page 38), and car clubs and cycle hire docking stations (DM 19 on page 40).

• DM14 on page 36. Transport impacts. We suggest adding
  (1) “14.2.5 Be designed in accordance with a travel plan for its users (residents, workers, pupils and visitors) to minimise car journeys by incorporating good provision for walking and cycling journeys. AND
  (2) Be carried out in ways which are safe for pedestrians and cyclists, including adherence to Construction Management plans which are (i) at least as comprehensive as Transport for London’s Guidance published in April 2013 and the construction industry’s Standard for Construction Logistics published in December 2013 and (ii) include arrangements to consolidate deliveries, especially during the fit-out phase of building.

• DM 15. Walking and cycling (pages 36 and 37). 15.1.4 Add “with crossovers at footway level in conformity with Southwark’s Streetscape Design Guide”. We would, however, prefer that Southwark moves more towards the Lambeth approach (eg visible in Clapham Old Town and on Cambria Rd on Coldharbour Lane) of the crossover very clearly being pedestrian space rather than vehicle space. The photograph below illustrates the example from Cambria Rd.
• Car Clubs. We strongly support DM 19.1 because, as stated under “Reasons”, car clubs substantially reduce both car mileage compared with car ownership, and demand for on-street car parking.

• DM 46 ON PAGE 76. Efficient use of land. We suggest adding to 46. 1.3: “including living space over shops.

• DM 47 Shop fronts (page 77). 47.1.5 We suggest strengthening this by substituting “will not be allowed “ for “is not supported”

• DM48 Outdoor advertising and signage. 47.1.5 We suggest adding: “including advertisements which distract vehicle drivers”

• 18. Implementation (page 97 at seq)

(1) There will be unforeseen and other substantial changes during the Plan period (2018 to 2033). The plan should include procedures for alteration in the event of major changes of circumstances.

(2) At the Health Scrutiny meeting on December 8 2014 the Head of Planning, Simon Bevan, told the meeting of the criteria which can be taken into account in Decisions on Planning. He referred to other criteria which were not normally taken into account. The former tended to relate to the design of buildings, such as heat insulation and room sizes; the latter to the surroundings of the buildings, such as ease and safety of walking and cycling to and from them. We suggest that it would be useful for Case Officers to use a Checklist for the latter category of criteria, based on the NSP.

WE HAVE THE FOLLOWING ANSWERS TO THOSE OF THE CONSULTATION KEY QUESTIONS OF PARTICULAR CONCERN TO US AS A GROUP

Key Question 6 Standards related to ease and safety of walking, cycling and public realm
Key Question 8 Facilities for cycle parking which respect the needs of pedestrians
Key Question 8 (second one) Yes, the Cross River Tram should remain in the NSP, because it will be needed with London’s growing population and changing GLA policies

- **Old Kent Road** (page 9)

  Our background for comments on the council’s ambitions for the Old Kent Road area is our role in the major Salisbury Row Streets for People project.

  We recognise the OKR’s potential for helping to meet the urgent need for more housing. We advocate that this is done:

  1. Principally through the use of low rise instead of high rise. Well designed low rise with space between buildings used for walking rather than vehicles can provide high density combined with good living conditions.
  2. With a pocket park or other park within five minutes walk of each dwelling, as far as possible by a traffic-free route.
  3. Without intrusion on existing green space.
  4. Replacement, in collaboration with Transport for London, of the out of date Bricklayers Arms flyover by a junction with better utilisation of space for housing and other uses

- **Peckham** (page 10)

  The area in the south of the town centre, between Dewar Street and Nigel Road, would be revitalised by making the road on the east of the large island two-way, by pedestrianisation of the road on the west of this island and the better use of the space occupied by the island as part of the shopping environment.

  Other areas, such as Flat Iron Square and, just over the border in Lambeth, the Herne Hill centre, have thrived when pedestrianised. There has been some recent upgrading of shops and restaurants in this area, indicating the potential for business development. We advocate a review and consultation on possible changes.

Southwark Living Streets – 10th January 2015