

Representation	Officer Response
<p data-bbox="188 316 483 344">SP5 Healthy, active lives</p> <p data-bbox="188 357 353 421">Individual NSPPSV31.10</p> <p data-bbox="188 466 456 494">Internal inconsistency</p> <p data-bbox="188 536 1088 600">Walking is mentioned in the “Reasons” section but omitted from the actual Strategic Policy List and therefore needs to be included in SP5 as:</p> <p data-bbox="188 606 851 635">6 Delivering a safer <i>walking and</i> cycling network; and ...</p> <p data-bbox="188 641 1111 743">9 Introducing the concept of active design which, among other things, makes using the stairs and attractive alternative to using lifts and encourages <i>walking and</i> the use of bicycles to for local trips.</p> <p data-bbox="188 788 842 817">Inconsistent with Mayor of London’s New London Plan</p> <p data-bbox="188 861 1102 957">Mayor of London’s Policy G3 Creating a Healthy city policy states: “A plan for improved access to green spaces and the provision of new green infrastructure.”</p> <p data-bbox="188 963 546 992">Suggested rewording for SP5:</p> <p data-bbox="188 999 1106 1062">7 <i>Increasing, protecting and</i> improving green spaces and access to them; and ...</p>	<p data-bbox="1142 466 1415 494">Representation noted.</p> <p data-bbox="1142 536 2065 708">The NSP will be revised taking on comments given to ensure that policies and guidance is sound. It is important to recognise that the NSP should be read as a whole. P48 Walking states that development must enhance the borough’s walking networks by providing footways, routes and public realm that enable access through development site and adjoining areas.</p>
<p data-bbox="188 1114 353 1177">Individual NSPPSV110.4</p> <p data-bbox="188 1187 698 1216">2. New Southwark Plan Strategic priorities</p> <p data-bbox="188 1260 1111 1433">The strategic priorities are unsound because they are not effective. The dependencies between SP2 (Social regeneration to revitalise neighbourhoods) and SP4 (Strong local economy) are not brought out fully in the Plan. It is clear, in a neighbourhood such as Peckham, that enterprise is intimately linked to sense of community. However, SP5 does recognise the</p>	<p data-bbox="1142 1187 1415 1216">Representation noted.</p> <p data-bbox="1142 1260 2065 1433">It is important to recognise that the NSP should be read as a whole. SP4 Strong local economy states that we will work to make sure that Southwark has a strong economy where all of our existing and new residents and workers benefit. P28 Small and independent businesses recognises that SMEs make up the majority of businesses in Southwark providing jobs for local</p>

<p>importance of SMEs and of helping start ups, through the High Street Challenge, which is to be encouraged. Economic diversification is essential if a community is to be more resilient; without stating those dependencies, SP2 is not effective.</p>	<p>people and opportunities for business start-ups and self-employment. 97% of businesses in Southwark are firms which employ less than 50 people. SP2 recognises the importance of ensuring that existing residents and neighbourhoods prosper from growth.</p> <p>The positive representation of SP5 acknowledged.</p>
<p>Organisation: Peckham Society NSPPSV140.2</p> <p>We will maintain and improve the health and wellbeing of our residents, encouraging healthy lives by tackling the causes of ill health and inequalities. This will be achieved by:</p> <ul style="list-style-type: none"> . 3 Working with residents and our partners to build resilient communities; . The aims outlined alone will not be effective in creating resilience: they should also include a commitment to mixed tenure housing, to create integrated communities, and the retention of individual social rented houses in areas where houses for sale have become expensive. Secondly, “partners” need to be defined, otherwise the meaning is unclear. 	<p>Representation noted. It is important to recognise that the NSP should be read as a whole. SP1 Quality affordable homes states that we need to build and facilitate delivery of a variety of new homes that meet the needs of households of different sizes, on different incomes and with a variety of specific needs. P1 Affordable Homes and P2 New Family homes state the development should deliver intermediate tenure homes.</p> <p>SP5 sets out a series of policies which will maintain and improve the health and wellbeing of our residents</p>
<p>Organisation: Southwark Cyclists NSPPSV164.4</p> <p>SP5 Healthy, active lives Not positively Prepared</p> <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. 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</p>	<p>Representation noted.</p> <p>It is important to recognise that the NSP should be read as a whole. P50 Cycling ensures the delivery of the Southwark Spine cycle route and the wider cycling network. The policy has been strengthened to ensure better facilities for cycle parking and also highlights the Southwark Spine Cycling Route which all sites adjacent to the network must support and integrate into any development.</p> <p>SP5 has also been strengthened to ‘increase, protect and improve green spaces.</p>

<p>and cycling routes has been shown to increase physical activity. To make this policy sound, the following changes should be including:</p> <p>6 Delivering 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 ; and 7 Improving and extending our network of green spaces; 9 Introducing the concept of active design which, among other things, makes using the stairs an attractive alternative to using lifts and encourage s utility cycling the use of bicycles to local trips</p>	<p>Reference is also made to introducing active design</p>
<p>Individual NSPPSV237.1</p> <p>Car ownership is on a trend of growth in Southwark e.g. Camberwell since 2013. There is no commitment to gather data on local shopping habits by transport mode (including driving to supermarkets), or to assess the impact of local kerbside car storage on local walking and cycling take-up.</p> <p>There is no mention of:</p> <ul style="list-style-type: none"> - local car ownership or local car use as factors in healthy, active lives; - how an increase in the number of cars stored kerbside, as well as their size, creates a visibly more dangerous environment for cyclists; - local trading conditions as a factor in the ability of local shops to supply a fresh, healthy and varied grocery offer. <p>The NPPF and the London Plan recognise the need for an evidence-based approach, as well as that there is a key link between car culture and poor health.</p> <p>For these reasons, the policy is unsound as it is incomplete.</p>	<p>Representation noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p>
<p>Organisation: Peckham Coal Line</p>	

"Do you consider that the New Southwark Plan is unsound because it is not:
- Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Ideally a specific policy should be introduced that defines PCL with reference to a boundary plan with an explanation of the project and its aims. More detail can be found in the PCL feasibility study. The proposal is an elevated park, pedestrian and cycle route to connect Peckham Rye (Rye Lane) and Queen's Road Peckham (Queen's Road opposite Asylum Road), and to connect to the wider green and cycle route networks. This will promote better connections between these areas, improve public health and encourage sustainable modes of transport. Development should not compromise the delivery of this route, and should contribute directly to it where directly affecting it. The PCL team would welcome the opportunity to discuss appropriate wording further. The additional policy could be located before or after policy P49. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered.

The NSP policy P49: Low line routes, specifically addresses the Peckham Coal Line. The Peckham Coal Line is designated as a low line route and indicated on a map. The policy states that 'Development must support the implementation of 'Low Line' routes across our borough. Development hindering or obstructing the implementation of 'Low Line' routes will not be permitted.' The Peckham Area Vision, AV.13.2 states that Development in Peckham should contribute towards the development of the Low Line and the Coal Line. In the NSP site allocations NSP77: Land between the railway arches (East of Rye Lane including railway arches) also makes clear that redevelopment of the site must support the implementation of the Peckham Coal Line.

Representation	Officer Response
<p data-bbox="188 252 528 284">P42: Healthy developments</p> <p data-bbox="188 293 589 357">Organisation: Southwark Cyclists NSPPSV164.9</p> <p data-bbox="188 402 371 574">P42: Healthy Developments Not consistent Not positively Prepared</p> <p data-bbox="188 619 1115 791">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 data-bbox="188 836 1070 1225">In order to make this policy sound, add the following: Health Impact Assessments should be carried out for major development proposals; Development proposals should: <ul style="list-style-type: none"> ● demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. ● reduce the dominance of motor vehicles on London’s streets whether stationary or moving. ● be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. </p>	<p data-bbox="1140 363 1417 395">Representation noted.</p> <p data-bbox="1140 440 2069 823">It is important that the NSP is read as a whole, a number of policies in this document address the management of the health impacts from transport. The Strategic Policy SP5 Healthy, Active Lives recognises the health impacts from transport through promoting a safer cycling network and the concept of active design, walking and green and open spaces. P46 states that development must improve accessibility to public transport by creating and improving walking and cycling connections. P48 Walking states that development must enhance the borough’s walking networks by providing footways, routes and public realm that enable access through development site and adjoining areas. P50 Cycling ensures the delivery of the Southwark Spine cycle route and the wider cycling route network.</p>

Representation	Officer Response
<p data-bbox="188 252 539 280">P43: Leisure, arts and culture</p> <p data-bbox="188 293 562 357">Organisation: A&M Leisure Ltd NSPPSV02.3</p> <p data-bbox="188 400 1106 611">Policy 43 Leisure, arts and culture of the NSP should be strengthened to include more positive policies to protect existing safe leisure facilities for the LGBT+ community from redevelopment, because of the decline in safe venues for this group by the Mayor’s SPG to contribute towards meeting the social needs of the acknowledged diverse population of Southwark and surrounding Boroughs.</p>	<p data-bbox="1140 363 2069 683">Representation noted. P43 Leisure, Arts and Culture states that development will be permitted where existing leisure, arts and cultural uses are retained or re-provided. This would include safe leisure facilities for the LGBTQ+ community. SP5 Healthy, Active Lives sets out that we will maintain and improve the health and wellbeing of our residents “working with residents and our partners to build resilient communities”; this includes the LGBTQ+ community. This policy has been updated to require an Equality Impact Assessment where in exceptional circumstances community facilities may no longer be needed.</p>
<p data-bbox="188 727 685 791">Organisation : Bankside Residents Forum NSPPSV19.23</p> <p data-bbox="188 834 1099 970">Clearly both P43 and supporting strategy is weak on specifics and yet will often be used as a material consideration when a planning decision is made. This policy is not effective because it over relies on the evidence provide in ‘Creative Southwark’ the cultural strategy 2017-2022.</p> <p data-bbox="188 1015 1113 1225">The policy makes no mention of the cultural aspects of the streets such as the railway and advertising heritage, how public art which can enhance an environment also needs to be a) sustainably managed (e.g. Monument to the Unknown Artist outside Bankside Mix) , and b) not used to as is the case of Neo Bankside’s Tempesta as a form of gate to a site through which there is public access as a condition.</p> <p data-bbox="188 1270 479 1299">There is no mention of :</p> <ul data-bbox="188 1305 1021 1369" style="list-style-type: none"> • the role small museums such as the Kilkaldy Testing Centre, the Old Operating theatre, and The Rose Theatre play, 	<p data-bbox="1140 834 2069 1297">Representation noted. The Creative Southwark Cultural Strategy 2017 to 2022 sets out our vision until 2022. It continues to place culture and creative industries at the heart of our priorities, shaping the context and delivering a range of programmes that support our long term ambition of Southwark being the first choice for people to live, work, study and visit. Although this policy doesn’t make specific mention of streets, railway arches or advertising heritage, there are a number of policies which address these. P18 Conservation of the historic environment and natural heritage, recognises that development must conserve and enhance heritage assets, included undesignated heritage assets which could include railway and advertising heritage. P27 Railway arches recognises that railway arches add character and are interesting places for shops, cultural, creative and community uses and restaurants.</p> <p data-bbox="1140 1342 1962 1370">The NSP is a document of strategic policies that sets guidance on the</p>

<ul style="list-style-type: none"> • how to protect and enhance vibrant theatre companies who have in the past been under threat due to gentrification, • the contributions and benefits of future developments creating impromptu or gallery spaces like Southwark Cathedral’s Refectory , the Bargehouse, or the White Cube. <p>P43 and its supporting evidence plays down the role Southwark’s planning decisions can have on the future of the creative industries as an the Jerwood Space one of London’s leading rehearsal spaces often champions the need for more rehearsal space not just for theatre, but music and film.</p> <p>While P43 recognizes the challenges, it does not provide solutions in terms of how planning decisions can be detrimental as well as influence, protect and support the leisure, arts, and cultural sectors. Glib mentions of tourism and the lack of understanding by planners on the impacts of being an international world art destination simply highlights how little thought has gone into this policy. Every tourist needs to get from A to B. That fact generates the need for careful consideration on virtually every policy from P12 through to P69.</p>	<p>aspiration of major development for new homes, social, green and transport infrastructure in the Borough. Representation has been acknowledged, but due to the strategic nature of this document a comprehensive list of all types of leisure, culture and arts assets would not be appropriate in this specific document.</p>
<p>Organisation: GLA NSPPSV66.12</p> <p>The draft new London Plan places more emphasis on the protection and promotion of culture and the creative industries, building on London Plan Policy 4.6 and therefore the protection and support for leisure, arts and culture development is welcome.</p>	<p>Positive representation noted.</p>
<p>Individual NSPPSV91.76 and NSPPSV128.76</p>	

<p>P43: Leisure, arts and culture Objection 58.</p> <p>We object to the failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge, and thus the policy will be weakened.</p> <p>NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation. NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.</p> <p>NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.</p>	<p>The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.</p> <p>P45 has been strengthened to require an Equalities Impact Assessment for any proposed loss of community facilities in predominant use by protected characteristic communities.</p>
<p>Organisation: Space Studios NSPPSV169.09</p> <p>Leisure, arts and culture we object to failure to define the scope of P43 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies.</p>	<p>The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.</p>
<p>Organisation: Sports England</p>	

<p>NSPPSV170.4</p> <p>Please see Sport England’s comments in relation to Policy P44. Sport England is concerned that policies P43 and P44 do not give sufficient protection to all sports facilities in the Borough, as allowed for currently in the National Planning Policy Framework. Amend the plan as set out in our representations to P44.</p>	<p>Representation noted. The wording will be strengthened in the reasons to ensure that sports facilities in the borough are given sufficient protection and support.</p>
<p>Organisation: Studio Make Create</p> <p>Regarding Strong, local economy policy P43: Leisure, arts and culture we object to failure to define the scope of P43 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies.</p> <p>This inadequacy makes the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan</p>	<p>The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.</p>
<p>Organisation: Vital OKR NSPPSV205.34</p> <p>P43: Leisure, arts and culture Objection 58.</p> <p>We object to the failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge, and thus the policy will be weakened.</p>	<p>The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.</p>

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation. NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

Organisation: Theatres Trust
NSPPSV189.1

The Trust welcomes the strength of this policy to ensure that Southwark's valued cultural facilities are retained, and that new ones are supported. However, this policy could be made more robust by stipulating within part 1.2 that the marketing exercise must show a realistic rental/sale value for the existing use. The Trust therefore recommends a minor amendment to this policy

Support noted. It is viewed that the policy is sufficiently robust, in terms of protecting community facilities and allowing flexibility for redevelopment providing there is no longer a local need for this facility.

<h2>Representation</h2>	
<p>P44: Community uses</p>	
<p>Individual NSPPSV56.14</p> <p>This policy is not sound because it has omitted a policy to provide explicitly for community social spaces.</p> <p>‘Community uses’ is a term usually meaning mainly institutional places like health centres or sports facilities. The quite different kind of spaces for self managed community groups and activities gets missed out and needs explicit recognition and positive promotion. This links with recognition in the Council’s committee papers of the importance of social interaction in achieving public health and well being, which is part of the SP2 ‘Social regeneration to revitalise neighbourhoods’. This is more than policies for institutional provision but needs the provision of self managed social spaces to enable the community’s own self generated interaction. This might be called ‘community social spaces’.</p> <p>Proposed change to make the NSP sound:</p> <p>There needs to be an explicit policy which meets this important but neglected community need. This might take the form of a definition of ‘community social spaces’ as distinct from this policy P44 for ‘community uses’. This could take the form of an additional suite of development management policies under SP2 ‘Social regeneration to revitalise neighbourhoods’.</p>	<p>Representation noted. P44: Community Uses recognises that ‘community facilities’ encompass a <i>wide</i> range of uses essential to meet diverse local needs. This broad approach would include self managed community spaces amongst other spaces in ‘Use Class D1, D2 and Sui Generis’.</p> <p>As stated in The Town and Country Planning (Use Classes) Order 1987 Class D1. Non-residential institutions Any use not including a residential use —</p> <ul style="list-style-type: none"> (a) for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner, (b) as a crèche, day nursery or day centre, (c) for the provision of education, (d) for the display of works of art (otherwise than for sale or hire), (e) as a museum, (f) as a public library or public reading room, (g) as a public hall or exhibition hall, (h) for, or in connection with, public worship or religious instruction. <p>Class D2. Assembly and leisure Use as —</p> <ul style="list-style-type: none"> (a) a cinema, (b) a concert hall, (c) a bingo hall or casino, (d) a dance hall, (e) a swimming bath, skating rink, gymnasium or area for other indoor or outdoor sports or recreations, not involving motorised vehicles or firearms.

<p>Organisation: Greendale Property Company NSPPSV71.7</p> <p>Update the policy to read:</p> <p>1 “New community facilities (Use Class D1, D2 and Sui Generis) will be permitted where provision is made for the facility to be used by all members of the community.</p> <p>2 Development should retain community facilities unless:</p> <ul style="list-style-type: none"> · Their loss is to be replaced as part of proposed development with an equivalent or better provision in terms of quantity or quality; or in exceptional circumstances there · an assessment has been undertaken which shows there is may no longer be a local need for a facility. This must be demonstrated through evidence of suitable marketing for continuous period of at least two years, immediately prior to any planning application, for both its existing condition and as an opportunity for an improved community facility.” 	<p>Representation noted.</p> <p>The quality of a replacement facility will be assessed on a case by case basis and will be expected to be of high quality design.</p> <p>The amendments proposed will not be included as there needs to be a provision for a change of use to be allowed in exceptional circumstances if it can be demonstrated that the current use is no longer required.</p>
<p>Organisations: Her Majesty's Courts and Tribunals Service NSPPSV81.2</p> <p>We recognise that your Council is concerned that finding new sites for community facilities can sometimes be difficult; however, overly restrictive local planning policies can limit the opportunity of releasing public sector land for new housing. Releasing surplus public assets for alternative uses, particularly residential uses, will support the government’s ambitions to increase housing supply, particularly in areas of high housing demand, by taking advantage of opportunities for development on brownfield land.</p> <p>We are concerned that your current proposed policy P44 does not allow for sufficient flexibility in the context of:</p> <p>i. Local, regional and national housing need and the opportunity that the release of surplus public sector land has in terms of addressing this need;</p>	<p>Representation noted. It is viewed that the policy is sufficiently robust, in terms of protecting community facilities and allowing flexibility for redevelopment providing there is no longer a local need for this facility. Strategic Policy SP1 Quality Affordable homes address the policy for good quality, affordable, efficient housing.</p>

and,
ii. Local, regional or national community infrastructure improvement/
modernisation strategies, such as HMCTS' s Court Estate Reform Programme.

We consider that the plan is unsound in this regard as it is not the most appropriate strategy when considered against reasonable alternatives. We suggest that the following changes to Policy 44 (Community Uses):

“1. New community facilities (Use Class D1, D2 and Sui Generis) will be permitted where provision is made for the facility to be used by all members of the community.

2. Development should retain community facilities, unless:

i. ~~In exceptional circumstances there may no longer be a local need for a facility. This must be~~ it can be demonstrated that there is no longer a need for a facility, through evidence of a suitable marketing process ~~for continuous period of at least two years, immediately prior to any planning application, for both its existing condition and as an opportunity for an improved community facility;~~ or,

ii. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.

Individual
NSPPSV91.77 and NSPPSV128.77

Objection 59.

We object to the failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge, and thus the policy will be weakened.

Representation noted. This plan is considered to be compliant with the NPPF and regional policies.

The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation. NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

Individual
NSPPSV129.1

Community uses

1 New community facilities (Use Class D1, D2 and Sui Generis) will be permitted where provision is made for the facility to be used by all members of the community. 2 Development should retain community facilities. In exceptional circumstances there may no longer be a local need for a facility. This must be demonstrated through evidence of suitable marketing for continuous period of at least two years, immediately prior to any planning application, for both its existing condition and as an opportunity for an improved community facility.

The Council needs to look at how it awards spaces and the kind of spaces, many residents are finding the available spaces and new spaces irrelevant eg local residents who want to run high rope projects are unable to find spaces that have the height, also the same space can be used for local artist who are finding it impossible to find recording spaces as they seem to be all

Representation noted. P44: Community Uses recognises that 'community facilities' encompass a wide range of uses essential to meet diverse local needs. This broad approach would include self managed community spaces amongst other spaces in 'Use Class D1, D2 and Sui Generis'.

As stated in The Town and Country Planning (Use Classes) Order 1987 Class D1. Non-residential institutions

Any use not including a residential use —

- (a) for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner,
- (b) as a crèche, day nursery or day centre,
- (c) for the provision of education,
- (d) for the display of works of art (otherwise than for sale or hire),
- (e) as a museum,
- (f) as a public library or public reading room,
- (g) as a public hall or exhibition hall,

categorised for NEETS schools and higher institutions as stated throughout the plan, seems to be missing out on young creatives who work and have creative sidelines that they are pursuing. This is evident in the number of people using the studio at 91 Peckham High st , were we are told that they have to travel far and wide to find accessible affordable studios Failure to meet the business development needs of Southwark; Failure to ensure that the assessment of and strategies for housing, employment and other uses are integrated, and that full account has been taken of relevant market and economic signals; Failure to carry out early and meaningful engagement and collaboration with aspiring young creative's during NSP preparation Failure to effectively cooperate with young residents to really identify the need as this is more likely to affect young people of whom have been living in the area all their life see the increased regeneration effectively pushing them out for those with more disposable income.

In accordance with the London plan

London Plan 'Policy S1 Developing London's Social Infrastructure' states that Boroughs should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities. I don't think Southwark has done this properly as we all know there are great unmet needs for specific groups of the community.

Gathering information from the London Plan I believe that more clarity and engagement between the community needs to be addressed appropriately 5.1.3 Planning for social infrastructure in London is complex. There are a wide range of providers and stakeholders and the degree of clarity around future provision and funding varies. It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy. Supplementary Planning Guidance will

(h)for, or in connection with, public worship or religious instruction.

Class D2. Assembly and leisure

Use as —

- (a)a cinema,
- (b)a concert hall,
- (c)a bingo hall or casino,
- (d)a dance hall,
- (e)a swimming bath, skating rink, gymnasium or area for other indoor or outdoor sports or recreations, not involving motorised vehicles or firearms.

The policy has now been strengthened to require an Equalities Impact Assessment for any proposed loss of community facilities in predominant use by protected characteristic communities as defined by the Equality Act 2010. This is to ensure facilities that are in use by people from all backgrounds have their needs met.

provide details of how this could be approached.

1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development Policy SD6

Red writing London Plan 2017

I also object to the plan as above that there has not been enough due diligence carried out to ensure that all the plans are as diverse as it is making out, as most developments seem to attract one particular demographic to new builds and areas and locals are not feeling invited in areas that they have lived all their lives, I believe that the plan as not allowed local resident to be fully engaged in the process and most telling people what will be done as opposed what we can all do .

I object on the grounds that the word community space needs to be defined as in planning applications

The Term community space needs better clarity as from what we see and how floor space is not relevant for local residents who want better identified spaces such as High Ceilings, acoustic space for large performances. This is totally out of sync with the residents boroughs needs.

We work with a range of young emerging artist and creative's who are finding it harder and harder to find appropriate space where there is no need to sell copious amounts of alcohol. D1 usage and availability to build capacity amongst young emerging creative's

Creative space needs to defined as everybody has their definition

So rotten

Dem People 15-21

Bloom

African Culture Market

<p>Drawing Line Narcy Collective Creative Crafts More Than1 Forum for people with disabilities Drummer Boy Nine and Three Quarters Steam Power (Stem Project) Black British Cultural Association No License Make it Our People Addera</p> <p>I am also constantly being asked for space for local women who want to take up cooking and creating an enterprise known of this has been taken into consideration</p>	
<p>Organisation: Space Studios NSPPSV169.10</p> <p>Community uses we object to failure to define the scope of P44 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies</p>	<p>The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.</p>
<p>Organisation: Sport England NSPPSV170.2</p> <p>Sport England considers that part 2 of Policy P44 where it applies to sports facilities (e.g. swimming pools, sports centres etc.) (see text box on use classes below) is not consistent with current government guidance. Paragraph 74 of the National Planning Policy Framework requires all sports facilities to be protected from development. This means that sports facilities</p>	<p>Representation noted.</p> <p>The plan has strengthened the policy on Leisure (P45) which would include sports facilities. Leisure facilities will also include sporting facilities. These uses may only be replaced by another use in exceptional circumstances and where there are currently more facilities than needed .</p>

should be retained as sports facilities (not lost to other types of community use), they should be protected in the same way that outdoor sports facilities, such as playing fields are protected. Sports facilities can be expensive to run and maintain. They may therefore be put at risk by the 2 year marketing requirement in this policy, as developers may purchase facilities with the intention of fulfilling this requirement to ensure they can realise their asset as a housing development of Redevelopment of sports facilities should only be permitted where a Council led built facilities strategy has concluded that facility is surplus to requirements (first bullet point of Paragraph 74).

In London where there is known to be existing shortfalls in built facilities and growing population will increase demand further, it is important to ensure that all sports facilities (whether in public or private ownership) are protected from development for other uses. There are unlikely to be sites in this Borough or adjacent Boroughs available to provide replacement facilities.

It is understood that the Council has not undertaken a complete built sports facilities strategy (see approach recommended by Sport England <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>)

Sport England therefore considers that further work is required by the Council to understand need for built sports facilities in Southwark and that until this work is completed, existing facilities should be protected from development. Sport England considers that the 2 year marketing period will not provide sufficient protection for sports facilities and is not compliant with national planning policy.

Sport England's objection could be addressed if additional text is provided as follows;

'3. Sports facilities used by the community require additional protection from development. Sports facilities should not be redeveloped for alternative uses unless an assessment has been undertaken which has clearly shown the buildings to be surplus to requirements OR the facility will be replaced in another location with a facility that is equivalent or better provision in terms of quantity and quality in a suitable location OR the sports facility will be replaced with alternative sports and recreational provision, the needs for which clearly outweigh the loss.'

Organisation: Studio Make create
NSPPSV175.15

Objection 59.

We object to the failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge, and thus the policy will be weakened.

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation. NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.

<p>Organisation: Theatres Trust NSPPSV189.2</p> <p>As for P43 above, the Trust welcomes this policy but recommends an amendment to include realistic rental/sale value as part of the marketing evidence.</p>	<p>Representation is noted. The NSP is a strategic document and will not include specific rental/sale values. However, when evidence is submitted of marketing that has been undertaken, the rental / sales value will be considered to ensure it is a realistic level.</p>
<p>Organisation: NSPPSV205.35</p> <p>Objection 59. We object to the failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge, and thus the policy will be weakened.</p> <p>NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation. NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.</p> <p>NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.</p>	<p>The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.</p> <p>This plan is considered to be compliant with national and regional policies. P43 will also only permit the change of use of a leisure, arts and cultural facility if it can be demonstrated that there are currently more facilities than needed.</p>
<p>Individual NSPPSV324.11</p>	<p>Representation noted. Area visions are strategic visions for the area and so do not specifically reference a particular community space. It is viewed that</p>

The lack of reference to community spaces in the Camberwell Area Vision and the NSP in general is worrying. P44 is weak in terms of encouraging community use of space which does not promote effective community cohesion.

The loss of community space without replacement is also unjustifiable. For instance, NSP28 (page 179) states that the development “may provide replacement community uses” for the community hall. Many residents of all ages use the community spaces in Southwark and development at the expense of these spaces does not constitute an effective plan for the community.

To be an effective vision for the whole community the Camberwell Area Vision must commit to the full replace of community spaces at the very least. This would be a simple language change: NSP28 (page 179) “must provide replacement community uses” for the community hall.

This will also be more internally consistent as P44 states that "Development should retain community facilities".

P44 sentence 1 should also be strengthened with words to the effect:
1. New community facilities (Use Class D1, D2 and Sui Generis) will be supported where provision is made for the facility to be used by all members of the community.

the policy is sufficiently robust, in terms of protecting community facilities and allowing flexibility for redevelopment providing there is no longer a local need for this facility. P44 Community states that community uses should retain community facilities. In exceptional circumstances there may no longer be a need for a facility. This must be demonstrated through evidence of suitable marketing for a continuous period of at least two years.

As stated in The Town and Country Planning (Use Classes) Order 1987

Class D1. Non-residential institutions

Any use not including a residential use —

- (a) for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner,
- (b) as a crèche, day nursery or day centre,
- (c) for the provision of education,
- (d) for the display of works of art (otherwise than for sale or hire),
- (e) as a museum,
- (f) as a public library or public reading room,
- (g) as a public hall or exhibition hall,
- (h) for, or in connection with, public worship or religious instruction.

Class D2. Assembly and leisure

Use as —

- (a) a cinema,
- (b) a concert hall,
- (c) a bingo hall or casino,
- (d) a dance hall,
- (e) a swimming bath, skating rink, gymnasium or area for other indoor or outdoor sports or recreations, not involving motorised vehicles or firearms.

Representation

P45: Hot Food Takeaways

Organisation: McDonald's
NSPPSV142.1

1. Introduction

1.1 We have considered the above policy and its supporting text with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework.

1.2 We consider that limiting the concentration and proximity to local secondary age schools of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices.

1.3 There is no adequate evidence to justify the underlying assumption, that locating any A5 use within certain distances of secondary age schools causes adverse health consequences, which would in turn have negative land use planning consequences.

2. Such an approach is not positive, justified, effective or consistent with the Framework.

2.1 Restricting the concentration of new A5 proposals within the borough is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic; environmental; and social progress, for this and future generations.

2.2 The suggested restrictions, take an ambiguous view of A5 uses in relation to the proximity to local secondary age schools. It would apply an over-

Representation noted. Southwark's evidence base: P45 Hot Food Takeaways: Review of the evidence reviews a number of studies which note the correlation of particular food environments on overweight and obesity. As such, this policy is informed by a sound evidence base, is positively prepared and in conformity with the NPPF.

generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.

2.3 Thus it is inconsistent with Para 19 and 21 of the Framework. Para 19 states:

Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

2.4 Para 21 states:

Investment in business should not be over-burdened by the combined requirements of planning policy expectations.

2.5 There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at Appendix A.

2.6 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'.¹

2.7 This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food,

stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'.²

2.8 The evidence provided at Appendix B confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.³

2.9 No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.

2.10 There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in Appendix C.

2.11 Research by Peter Dolton states that "At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."⁴ This clarifies that a blanket restriction on opening hours is unjustified.

2.12 Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'.⁵

2.13 Only limited purchases of food are made at A5 uses on journeys to and

from school. Further details are set out in Appendix D.

2.14 Given the limited access that children have to fast food during the school day, a generic restriction is disproportionate; is not justified; and would not be effective.

2.15 Such an approach would have a disproportionate effect on land use planning and the economy when taking into account the limited purchases made by school children who may only have the potential to visit A5 establishments at the end of the school day, and only during term time.

2.16 The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.

2.17 The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.

3. Soundness - summary

3.1 We consider that restricting the concentration and proximity of hot food takeaways to local secondary age schools would be unsound and fails to meet the four tests of the Framework. It is not a positively approach to planning; justified; effective; or consistent with national planning policy. Such

a policy should therefore not be taken forward to the next stage of the plan making process.

3.2 Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of.

4. McDonald's has made major steps in recent years to expand the range of healthy offerings

4.1 As a responsible business, McDonald's recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald's has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald's has:

- Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu
- Completely removed hydrogenated trans-fats from its menu
- Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003
- Reduced fat in its milkshakes by 34% per serving since 2010
- Reduced fat in its deli rolls by 42% since 2011

4.2 McDonald's has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald's has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.

4.3 This is in addition to the nutritional information that is already available on its website, on its tray liners, on its packaging, and via McDonald's mobile phone app. In 2012 alone, McDonald's received 2.2 million visits to its nutrition web page.

4.4 Furthermore, McDonald's is committed to responsible advertising, and advertise to children only food items that are not classified by the Government's nutrient scoring criteria as High in Fat, Salt or Sugar "non-HFSS". All of McDonald's advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.

4.5 As a significant customer of British farming, McDonald's buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009.

4.6 All of McDonald's burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.

4.7 In addition, McDonald's only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.

4.8 McDonald's was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald's use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded 'Food Business of the Year' by the British Free Range Egg

Producers Association.

4.9 The strength of McDonald's supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris Elliott, who said in light of the horsemeat scandal: "McDonald's invited us to look at farms and abattoirs – it was a very simple supply chain. The other thing I was very impressed about was the length of contract McDonald's had with its suppliers."⁶

5. McDonald's also contributes to the community

5.1 As the Community Partner of the Football Association, McDonald's has helped to train and recruit more than 25,000 coaches. These coaches in turn have provided more than 2 million hours of free quality coaching, to one million young players.

5.2 Over 1,000 McDonald's restaurants across the UK are 'twinned' with a local team to provide free kit, equipment, advice and expertise.

5.3 Each of McDonald's restaurants also conduct a minimum of three litter patrols on a daily basis, and conduct larger Love Where You Live 'clean up' events. McDonald's is also the primary sponsor of the Mayor of London's Capital Clean Up campaign, to tackle litter across London.

5.4 Last year, McDonald's restaurants in Greater London organised over 50 community clean-up events, with over 1,400 volunteers taking part.

6. McDonald's is a major employer of young people

6.1 McDonald's is a major employer of young people under the age of 25, and for many it provides a first step on the career ladder. McDonald's offers all staff the opportunity to gain qualifications which include Adult Certificates in English and Maths, a Level 2 Apprenticeship, and a Foundation Degree in Managing Business Operations.

6.2 McDonald's invest £43 million annually in staff training and development.

7. There is a lack of evidence to demonstrate whether fast food is located by schools, or whether schools are located by town centres

7.1 When McDonald's looks at the economic viability of a new site, it does not factor in predicted sales from school children or proximity to schools.

7.2 Research by Christoph Buck has identified a similar approach with other retailers. His research suggests that 'food retailers are mainly located near major roads and in inner cities.'⁷

7.3 Indeed, 'food retailers are not clustered around schools for up to 1.5 km'⁸ Correlations between schools and fast food density are therefore due to the proximity of both to town centres, where there is a broad mix of retail on offer.

7.4 With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres – contrary to the

sequential test.

8. Conclusion

8.1 It has been highlighted above that there is no appropriate reason to restrict A5 uses from local secondary age schools or their concentration.

8.2 It is unsound to introduce such a widespread land use policy to protect the amenity of such uses, which could be dealt with on a case by case basis via conditions.

8.3 No consideration is given to potential conflicts with the sequential approach.

Organisation: SSA Planning Limited, on behalf of Kentucky Fried Chicken (Great Britain) Limited
NSPPSV173

This Representation is made by SSA Planning Limited, on behalf of Kentucky Fried Chicken (Great Britain) Limited, in relation to Policy P45 of the New Southwark Plan Proposed Submission Version.

1.2 Kentucky Fried Chicken (Great Britain) Limited is committed to working in partnership with government to increase the availability of healthy diet and exercise choices. It has delivered on this by:

- Signing up to the Department for Health Responsibility Deal.
- Displaying calorie information in all 830 of its UK restaurants.
- Engaging in a programme of salt reduction across its menu.

Representation noted. Southwark's evidence base: P45 Hot Food Takeaways: Review of the evidence reviews a number of studies which note the correlation of particular food environments on overweight and obesity. As such, this policy is informed by a sound evidence base, is positively prepared, effective, justified and in conformity with the NPPF.

- Not automatically salting fries and reducing salt sachet sizes.
- Removing all artificial trans fats from its menu six years ago.
- Working with the Food Standards Agency to improve its menu.
- Offering healthier choices such as salads and grilled chicken.
- Taking a responsible approach to marketing.

1.3 Kentucky Fried Chicken (Great Britain) Limited has already taken and is continuing to take practical measures as part of this commitment.

1.4 Consequently, Kentucky Fried Chicken (Great Britain) Limited agrees with any reasonable and fair strategy that has an objective of increasing the availability of healthy diet and exercise choices. It cannot agree with measures which may be unlawful and which simply restrict choice for all members of the public without good evidence of effectiveness.

1.5 SSA Planning Limited is an independent town planning consultancy with expertise in strategic promotion, policy design, infrastructure, environmental assessment and the management of application and appeal processes. Based in the East Midlands, SSA Planning Limited operates across the UK.

2 COMPLIANCE

2.1 We consider that no regard has been given to national policy and advice in preparing Policy P45 because no National Planning Policy Framework (NPPF) policies deal with dietary issues. This means that the Plan does not comply with sub-section 19 (2) (a) of the Planning and Compulsory Purchase Act 2004 (PCPA04).

2.2 Specifically, taking into account the proximity of hot food takeaways to schools or indeed any other type of facility has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services is directly contrary to national policy.

2.3 We consider that no regard has been given to national policy and advice in preparing Policy P45 because the Plan would furthermore be rendered unsound in terms of the criteria set out at NPPF paragraph 182. This also means that the draft Plan does not comply with sub-section 19 (2) (a) of PCPA04.

2.4 We do not consider a reasoned justification for the draft policy has been substantially provided in accordance with regulation 8 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012. Neither the supporting text nor the evidence base support zonal restrictions on food and drink uses.

3 SOUNDNESS

3.1 We consider that the inclusion of Policy P45 renders the draft Plan unsound because the draft policy fails to meet the criteria set out at NPPF paragraph 182, as follows:

Positively Prepared

3.2 The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a secondary school as zero, but does so without evidence of either a link between the incidence of childhood obesity and the proximity of hot food takeaways to schools or of any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

3.3 In fact, as Figure 3 shows, the distance chosen has the effect of banning hot food takeaways from a large area of the Borough. Because no assessment has been made of the number that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts.

3.4 The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice

and serve the same type and standard of food.

Justified

3.5 There is no objective evidence for any link between the incidence of obesity and the proximity of hot food takeaways to schools, so it is at best unclear whether refusing planning applications for hot food takeaways on the basis suggested could ever have an effect on the incidence of obesity, childhood or adult, near schools or elsewhere.

3.6 A further difficulty of using simple distance radii as shown in Map 5.1 is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away.

3.7 Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more appropriate strategy for reducing childhood obesity.

3.8 Whilst no evidence is presented to support any public health effects of the specific concentrations of food and drink uses referred to in draft Policy P45, we consider high concentrations of any one type of use are unhealthy in retail health terms, and that this may sometimes also be the case in terms of human health.

Effective

3.9 Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods; however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

3.10 The area that would be affected by the policy covers most of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against the objective result in reduction or expansion of the zones? What other corrective action might

be taken short of its withdrawal?

Consistent with National Policy

3.11 We consider that no regard has been had to national policy and advice in preparing Policy P45 because none of the NPPF policies include dietary issues.

3.12 The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable.

National practice guidance simply refers to a briefing paper containing case studies.

4 SUMMARY

4.1 In summary, KFC (GB) Limited considers that inclusion of Policy DM56 renders the LP DMP-PO unsound and so OBJECTS to Policy P45 on the above grounds.

4.2 The amendment sought by KFC (GB) Limited, and the only change to the Plan that would render it sound, is deletion of Policy P45 part 3 entirely, and the provision of evidence for the numbers in parts 1 and 2 as it may be that the criteria are sound, but evidence is needed for the particular figures used.

Representation	Officer Response
<p data-bbox="188 252 448 284">P46: Public transport</p> <p data-bbox="188 308 788 371">Organisation: Berkley Homes (South East London) NSPPSV21.12</p> <p data-bbox="188 416 1115 520">We broadly support the objectives of Policy 46 and in association with Policy IP2 (CIL and Section 106) the need for development to contribute to improvements to public transport infrastructure (through S106) is supported.</p> <p data-bbox="188 560 1102 842">However we consider that the Council should adopt the approach identified in the draft London Plan Policy SD1 (Growth Corridors and Opportunity Areas) where future development across London should be linked to both existing and future public transport infrastructure. NSP draft Policy D6 notes that the density of development should be based on planned levels of infrastructure and where there is insufficient capacity at present boroughs should work with applicants to ensure the sufficient capacity is provided at the appropriate time.</p> <p data-bbox="188 882 1093 986">On this basis it would be helpful if Policy P46 can include more reference to the future accessibility of a site and the future capacity in public transport once proposed changes to infrastructure are delivered.</p>	<p data-bbox="1142 416 1420 448">Representation noted.</p> <p data-bbox="1142 488 2029 592">P46 requires development to improve accessibility to public transport. Individual sites that come forward will be assessed on a case by case basis and transport issues will be a key factor that cases are decided against.</p>
<p data-bbox="188 1066 546 1129">Organisation: Greenpruce GP NSPPSV72.10</p> <p data-bbox="188 1174 1084 1385">The wording of this policy requires new development to demonstrate capacity in the public transport network, taking into account existing and permitted development. It is proposed that this policy should go further in explicitly acknowledging that proposed transport infrastructure improvements, for example the BLE, will be a material consideration in evaluating the capacity of a development site, recognising that the</p>	<p data-bbox="1142 1174 2007 1310">As these have already been stated in Policy P51, there is no need of replicating these under P46, bearing in mind that all pertinent transport policy areas will be applied to every development proposal that is being assessed.</p>

<p>timescales for delivering the BLE and the timescales involved with taking a site through the planning process through to the point of development may not neatly align, but due to the significant investment involved a level of policy comfort in terms of taking into account proposed new infrastructure would be a welcome amendment. This is especially salient given that draft Policy 51 (Transport Infrastructure Improvements) stipulates that new development "must support the implementation of ... the Bakerloo Line extension to Old Kent Road".</p>	
<p>Organisation: Port of London Authority NSPPSV143.7</p> <p>7. Policy P46: Public Transport</p> <p>The PLA consider that the policy could be made stronger by specifically referring to all types of public transport that operates in the borough, including the riverbus services that operate in the borough.</p>	<p>Representation is noted.</p> <p>Reference to using the Thames as a mode of transport is referenced in the P 22 River Thames policy</p>
<p>Organisation: TfL City Planning NSPPSV181.3</p> <p>The policy helpfully acknowledges the importance of transport capacity as well as accessibility, which is a key issue in parts of the borough. The policy or supporting text could be strengthened further by stating that development would be expected to fund capacity improvements to public transport should there be an identified capacity constraint issue. This policy should provide a clear statement that the cumulative impacts of developments within close proximity will be considered when the policies are applied. It should also reference the necessity of improvements to the existing public transport network (i.e. including BLE and other PT</p>	<p>The policy has been amended to state 'cumulative' impact. Other policies within the Plan set transport requirements and standards within development to ensure there is the capacity for the development.</p> <p>Where there is not capacity for the development Policy IP3 (community infrastructure levy (CIL) and section 106 planning obligations) requires development that results in potential adverse impacts that make a proposed development unacceptable to be offset by using Section 106 legal agreements to either offset the impact or pay the council financial contributions to enable the council to offset the impact.</p>

<p>improvements) in facilitating new development.</p>	
<p>Organisation: 313-349 Ilderton Road LLP NSPPSV217.9</p> <p>Public transport states that development must: demonstrate that the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development, taking into account the impact of local existing and permitted development; improve accessibility to public transport by creating and improving walking and cycling connections to public transport stops or stations; improve, maintain and enhance public transport service.</p> <p>We support the policy in its current form.</p>	<p>Support noted.</p>
<p>Individual NSPPSV238.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark <p>And:</p>	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>This policy does not require the suggested amendments because NSP Policies P11, P15, P48 and P50 address walking and cycling adequately and any new walking/cycling routes secured will have to be designed in accordance with the Council's design guides. NSP Policies P47, P52, P53 and P67 cover the other issues relating to minimising congestion, construction management and car parking. SP5 also refers to improving and protecting green spaces in the borough.</p>

<ol style="list-style-type: none"> 1. Southwark makes no provision for a linked up dense mature tree green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting. 2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth 3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets 4. No new private car parking in new developments other than disabled and car club bays 5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.” 	
<p>Individual NSPPSV330.7</p> <p>The high number of developments at the Elephant & Castle have resulted in a large number of additional properties in a very small area. The result is that overcrowding at the Elephant & Castle stations has become worse. The Council has failed to take into account the additional needs of the public transport infrastructure, and has consequently put people's wellbeing at significant risk.</p> <p>The Council's failure to estimate need in approving planning permission for a number of sites here, including the attempted permission for a large 1000 unit site at Elephant & Castle, leads me to believe that the Council is incapable of appropriately assessing public transport provision, or in liaising</p>	<p>Representation noted.</p> <p>Each site that comes forward, including Elephant and Castle, are assessed on a cases by case basis on various factors including impacts on transport. P46 requires development to demonstrate that the public transport network has the capacity to support the increase in journeys by users of the new development.</p> <p>TfL have engaged with the Council throughout the making of the plan.</p>

with its main partner in this regard, Transport for London, who have reduced the number of buses serving the area.

Specifically, development of sites NSP46 and NSP47 appear to include both significant disruption to tube entrances, and loss of a hugely beneficial step-free access ramp connecting the Northern Line and Main Line rail services at Elephant & Castle.

The Council's failures consequently lead us to believe that their plan would not be effective if they continue to manage the planning department.

The plan requires a statement of commitment from Transport for London.

The plan requires guidelines for developments that increase occupation in an area by more than 5% as to how they will ensure there is a sufficient increase in public transport provision.

Representation	Officer Response
<p data-bbox="188 252 472 284">P47: Highways impacts</p> <p data-bbox="188 308 546 371">Organisation: Greenpruce GP NSPPSV72.11</p> <p data-bbox="188 416 1099 659">Criterion (5) of this policy states that all deliveries and servicing for large development sites must take place within development sites and not on the public highway. It is considered that this blanket approach is not necessarily appropriate, particularly for large-scale, masterplanned schemes where a managed approach to on-street servicing might be entirely appropriate, and allow for the optimisation of development capacity and density. It is recommended that this criterion be amended as follows:</p> <p data-bbox="188 703 1032 842">"On-site deliveries and servicing will be prioritised only where it is demonstrated that onstreet servicing and deliveries would result in an adverse impact on the existing highway."</p>	<p data-bbox="1137 379 2069 518">This amendment is unnecessary because this policy seeks to contain delivery activities within each development and ensure that vehicles enter and leave each site in a forward gear, so as to minimise conflict with pedestrians and maximise available road space especially in relation to large developments.</p>
<p data-bbox="188 885 589 949">Organisation: Southwark Cyclists NSPPSV164.10</p> <p data-bbox="188 994 371 1026">P47: Highways</p> <p data-bbox="188 1029 291 1061">Impacts</p> <p data-bbox="188 1064 344 1096">Not justified</p> <p data-bbox="188 1099 371 1131">Not consistent</p> <p data-bbox="188 1134 353 1166">Not effective</p> <p data-bbox="188 1169 344 1201">Not planned</p> <p data-bbox="188 1204 313 1236">Positively</p> <p data-bbox="188 1240 1115 1385">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</p>	<p data-bbox="1137 994 1420 1026">Representation noted.</p> <p data-bbox="1137 1029 2069 1241">The recently adopted Movement Plan sets out how Southwark plans to improve people's experience of travel, to within and around the borough, focussing on traffic reduction and management. This policy is also backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p data-bbox="1137 1244 2069 1385">The NSP is working towards the same objectives to promote more active modes of travel. Management of highways impacts is also covered in other policies in the NSP, namely P52 Car Parking and P51 Transport Infrastructure, and SP6 as a strategic policy promoting cleaner, greener, safer policies.</p>

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).

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.

A. New development must address its transport impacts in a sustainable manner and in accordance with best practice.

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.

C. New development will only be permitted where it :

i. Reduces the need to travel and encourages high-density and high-trip generating development around transport nodes and highly accessible areas.

ii. Integrates land use and transport and will encourage mixed use developments which support compact growth and regeneration.

iii. Minimise the demand for private car trips, including tax and Private Hire Vehicles, and van deliveries.

iv. Fully mitigates any adverse impacts upon the capacity of transport infrastructure, including

<p>pavements and other walking routes, cycle routes, public transport and roads.</p> <p>v. The transport and environmental impacts of development construction must be minimised and mitigated through Constructions and Logistics Plans (CLPs) incorporating adherence to the 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.</p> <p>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.</p>	
<p>Organisation: Tesco Stores Ltd NSPPSV180.10</p> <p>Policy P47 of the New Southwark Plan seeks to ensure that there are no negative impacts from new development.</p> <p>Our client generally supports the principles and objectives set out in Policy 47. However, the policy states 'development must incorporate delivery and servicing within large development sites and not on the public highway'. On this point, our client expresses concerns on the basis that there is no clear definition of what constitutes large development.</p> <p>Our client has concerns regarding the need for servicing to not occur on the public highway when this is not always possible, especially in high street,</p>	<p>Representation noted.</p> <p>Large development sites are 'major' development sites.</p> <p>There will always be an impact on the highway and therefore servicing is required to be addressed within the development.</p> <p>This amendment is unnecessary because this policy seeks to contain delivery activities within each development and ensure that vehicles enter and leave each site in a forward gear, so as to minimise conflict with pedestrians and maximise available road space especially in relation to large developments</p>

town centre locations. As a result of the current wording, Policy P47 is likely to severely restrict servicing of convenience stores that do not benefit from off-street arrangements.

Our clients concerns are heightened by the lack of definition for what constitutes a large development. It is thus requested that a degree of clarity and flexibility be applied to Policy P47.

It is therefore suggested that a caveat could be added to the existing policy wording which states *'incorporate delivery and servicing within large development sites and not on the public highway where possible or where it can be demonstrated that delivery and servicing on the public highway will have no adverse impact'*.

Organisation: TfL City Planning
NSPPSV181.4

Mention could be made here in the supporting text of the Mayor's 'Vision Zero' (and/or the Council's own targets) for road casualty reduction, given that road safety is a key issue and that well designed development plays an important role in helping deliver this target, both during construction and residually. The policy/supporting text could specify the requirement for larger/high impact developments to have approved construction management/logistics plans and delivery and servicing plans, in line with NLP policy T7.

As for policy P46, this policy should provide a clear statement that the cumulative impacts of developments within close proximity will be considered when the policies are applied.

Organisation: 313-349 Iderton Road LLP
NSPPSV217.10

Highways impacts states that development must: minimise the demand for private car journeys; demonstrate that the road network has sufficient

Accident analyses are covered within the scope of Transport Assessment Response (TAR) and the applicant needs only to demonstrate specific accident pattern that requires ameliorative measures.

The policy requires the development to demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished and how vehicle movements will be minimised and strictly controlled to reduce danger to vulnerable road users. Further guidance on this will be addressed in a SPD rather than policy as required.

Support noted

capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development; ensure safe and efficient operation of the local road network, the bus network and the Transport for London Road Network; ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys; incorporate delivery and servicing within large development sites and not on the public highway; and demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished.

We support this policy in its current form.

Individual
NSPPSV238.2

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark

And:

1. Southwark makes no provision for a linked up dense mature tree green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting.

The NSP is considered to be compliant with national and regional policies.

The NSP has policies to address all of these issues and it relies on a newly prepared Movement Plan. Namely, for point one, policies P50 Cycling, P51 Transport Infrastructure Improvements set out our transport strategy. For point two, policy P58 Green Infrastructure, P59 Biodiversity and P60 Trees create these green links.

For point three and four, this point is addressed in our parking policy P52 Car Parking, which sets out the eligibility for car parking permits within Controlled Parking Zones (CPZs).

For point five, this is covered by policy P50 Cycling and P48 Walking.

- 2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth
- 3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets
- 4. No new private car parking in new developments other than disabled and car club bays
- 5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.”

Individual
NSPPSV251.3

We suggest the Plan should be drawn up again to include:

- 3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets
- 5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.”

Individual
NSPPSV252.3

The Plan should be drawn up again to include:

This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.

This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.

<p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	
<p>Individual NSPPSV254.3</p> <p>We suggest the Plan should be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p>
<p>Individual NSPPSV256.3</p> <p>The Plan should be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p>
<p>Individual NSPPSV257.3</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and</p>

<p>I suggest the Plan should be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries</p>	<p>P67 address issues relating to minimising traffic congestion .</p>
<p>Individual NSPPSV258.3</p> <p>The Plan should be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion .</p>
<p>Individual NSPPSV259.3</p> <p>Please consider redrawing the Plan and including:</p> <p>3. Reduced motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion .</p>

<p>Individual NSPPSV262.3</p> <p>To make the Plan legal, I suggest that it should be drawn up again to include:</p> <p>3. A plan to reduce in motor traffic, with clear targets and measures to tackle SatNav fuelled rat-running through our residential streets</p> <p>4. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p>
<p>Individual NSPPSV264.3</p> <p>The Plan should be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries</p>	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p>
<p>Individual NSPPSV267.2</p> <p>It is my understanding that the policy does not even goes so far in stating that HGV lorry serving building sites will not be fitted with cameras on board to cover blind spots in the drivers vision, or drivers be trained cycle and pedestain safety, I know in the past HGV lorries have had to make visits to constructions site during stipulated hours to reduce the stress on what is already a stress transport system.</p>	<p>The required delivery and service management plan and construction management plan specifies that delivery/construction vehicles should be registered with Freight operators recognition scheme (FORS). This is beyond planning policy control, and is a separate issue related to highways and vehicular safety.</p>

<p>Individual NSPPSV269.2</p> <p>The New Southwark Plan should be drawn up to include the following plans:</p> <p>b) Proactively reduce motor traffic with targets and interventions (like modal filtering) to reduce so called 'rat-running' that is facilitated by the advances in sat-nav technology resulting in greater volumes of through traffic in residential streets.</p> <p>d) Strict policies on construction firms to ensure work does not endanger people cycling and walking e.g. by requiring the use of the highest safety rated-lorries.</p>	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>
<p>Individual NSPPSV270.2</p> <p>The Council should draw up the Plan again to include a strategy to reduce motor traffic, in particular clear targets and measures to tackle Satnav fuelled rat-running through our residential streets e.g. Camberwell Grove and the area around Bellenden Road.</p> <p>Also important is the implementation of tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>
<p>Individual NSPPSV273.3</p>	

<p>The Plan should be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav-- fuelled rat-running through our residential streets.</p> <p>5. Tough policies on developers to ensure construction does not endanger cyclists and walkers, such as by requiring use of the highest safety-rated lorries.</p>	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>
<p>Individual NSPPSV276.3</p> <p>More relevant to today's transport and infrastructure needs would be to include the following: _</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>
<p>Individual NSPPSV277.3</p> <p>I would like the plan to be drawn up again to include:</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>

<p>This would also align with the mayor of London's plans for Healthy Streets.</p>	
<p>Individual NSPPSV281.2</p> <p>I also believe it fails to address the following items:</p> <ul style="list-style-type: none"> • Reducing general motor traffic and in particular 'rat-runs' through residential streets 	<p>This policy in conjunction with P67 is adequate. The recently adopted Movement Plan also seeks to improve transport in the borough by prioritising the movements of people over cars.</p>
<p>Individual NSPPSV283.3</p> <p>The Plan must be drawn up again to include all of the following please:</p> <p>Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets, this is really a menace.</p> <p>Default blanket policies encumbant on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>
<p>Individual NSPPSV284.2</p> <p>I believe the plan should include:</p> <ul style="list-style-type: none"> - reduced motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets 	<p>This policy in conjunction with P67 is adequate.</p>
<p>Individual NSPPSV285.3</p>	

<p>Reducing motor traffic and private car parking will improve air quality and encourage cycling and walking.</p>	<p>Noted. This policy in conjunction with P67 is adequate.</p>
<p>Individual NSPPSV294.6</p> <p>The Plan would be much more effective if it additionally includes:</p> <ul style="list-style-type: none"> - Reduce motor traffic and pollution, Especially on narrow residential streets. - Tough policies on developers to ensure construction does not endanger people Cycling and walking, such as by requiring the use of the highest safety rated lorries, with safe and manned entry and exit points to construction sites. also policies to minimise pollution. 	<p>This policy in conjunction with P67 is adequate. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>
<p>Individual NSPPSV317.2</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.</p> <p>There is very little mention about the licensed taxi trade in the report and yet this must be a key part of the transport infrastructure. We are able to move wheelchair users and other mobility impaired people. Some of my customers say that they use taxis rather than owning a car. Please don't remove the flyover at the Bricklayers Arms Junction as this will be harder for the taxi trade to move around.</p>	<p>Noted. The licenced taxi trade is not a planning policy issue.</p>

Representation	Officer Response
P48: Walking	
<p data-bbox="188 347 517 416">Organisation: LB Lewisham NSPPSV106.6</p> <p data-bbox="188 456 994 520">I set out below officer level comments from the London Borough of Lewisham:</p> <p data-bbox="188 563 663 595">In relation to working with neighbours:</p> <p data-bbox="188 636 1111 882">1 We acknowledge that through the South East London Duty to Cooperate group we have been working together under the duty, have entered into dialogue on a range of sub-regional and strategic cross boundary issues over a number of years and throughout the preparation of your Plan. We welcome the specific references given to this group and its outputs (e.g. 2014 South East London SHMA) in paragraphs 2.8, 2.9, 2.11 and 3.14 of your Duty to Cooperate Statement.</p> <p data-bbox="188 924 999 991">2 We welcome how your Plan acknowledges connectivity with your surrounding neighbours, especially in policies:</p> <ul data-bbox="188 995 1099 1386" style="list-style-type: none"> <li data-bbox="188 995 1077 1027">• IP1 Infrastructure – by mentioning working with neighbouring boroughs. <li data-bbox="188 1032 1099 1134">• P22 River Thames – by mentioning that development will relate to its neighbours, taking into account how the river meanders and the impact this can have on how buildings may be seen together. <li data-bbox="188 1139 1099 1315">• P48 Walking – by enhancing the borough’s walking networks by providing footways, routes and public realm that enable access through development site and adjoining areas and by enhancing strategic networks such as the Green Chain walking route, and supporting new and existing green links across the borough and sub-regionally. <li data-bbox="188 1319 1093 1386">• P49 Low line routes (figure 4) – by recognising the low line routes in close proximity to the borough boundary with Lewisham. 	<p data-bbox="1137 456 1227 488">Noted.</p>

<ul style="list-style-type: none"> • AV.05 Crystal Palace and Gypsy Hill Area Vision – by being mindful of cross boundary issues. 	
<p>Organisation: LB Lambeth NSPPSV333.4</p> <p>The Waterloo area has traditionally lacked much permeability and we welcome all commitments to enhance connectivity, especially for pedestrians and cyclists, and are pleased to see commitments to furthering the ‘low line’.</p> <p>Lambeth is committed to safeguarding The Cut and Lower Marsh as a retail Centre and welcomes all moves which contribute to its vitality. Conversely we would be concern about any proposals that detract from the vitality and viability of the Lower Marsh / The CUT CAZ frontage.</p>	<p>Indicative Low Line routes are planned to extend into Lambeth in the Waterloo area.</p> <p>Our policies also safeguard The Cut as a CAZ frontage and seek to safeguard 40% A1 uses to support the vitality and viability of these frontages.</p>
<p>Organisation: Port of London Authority NSPPSV143.8</p> <p>8. Policy P48: Walking</p> <p>The PLA consider that the Thames Path must also be mentioned alongside the Green Chain walking route under point 5 of the policy, to ensure this receives a high priority in the plan, which is in line with the PLAs Thames Vision, which includes the goal to join up the Thames Path from source to sea, and improving access to riverside paths, as well as the London Plan.</p>	<p>This policy in conjunction with Policy P22 addresses this point</p>
<p>Organisation: Southwark Cyclists NSPPSV164.11</p> <p>P48: Walking Not justified Not positively prepared Not consistent</p>	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>This policy in conjunction with all of the other policies under SP5 addresses these points</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. To be made sound, a new evidence base and new policy are needed: New development will only be permitted where it:</p> <ul style="list-style-type: none"> i. Improves the pedestrian environment, in line with TfL street types, such as through creation of Home Zones. 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. iii. Is permeable - easy and safe to walk through - and adequately lit; 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. v. Contributes towards improved wayfinding including signposted links to key infrastructure, transport nodes, green spaces and Thames Path where appropriate. 	
<p>Organisation: TfL City Planning NSPPSV181.5</p> <p>This policy could specify that larger developments should provide pedestrian wayfinding, such as Legible London. To strengthen the policy further, Part 5 could specifically mention the Thames Path National Trail, which is obviously one of the key strategic walking routes in the borough. The supporting text or ideally the policy itself could specifically mention the 'Healthy Streets Approach', which is a key plank of the draft Mayor's Transport Strategy (MTS) and NLP. Explicit mention here will help connect to</p>	<p>Policy P15 (designing out crime) requires development to be designed with clear and uniform signage to help people move around.</p> <p>Policy P24 (River Thames) requires development to establish or continue the River Thames Path along the water frontage.</p> <p>Policy SP5 (healthy, active lives) considers healthy streets and sets out how we will maintain and improve the health and wellbeing of our residents</p>

<p>the corresponding policies in the MTS and NLP.</p>	<p>which includes encouraging walking and cycling.</p>
<p>Individual NSPPSV238.3</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark <p>And:</p> <ol style="list-style-type: none"> 1. Southwark makes no provision for a linked up dense mature tree green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting. 2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth 3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets 	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>This policy in conjunction with P67 and other policies in SP5 adequately addresses point 1-4 that are raised. The management of the construction of a site is dealt with through a construction management plan during the planning application stage.</p>

4. No new private car parking in new developments other than disabled and car club bays

5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.”

Representation

P49: Low Line routes

Organisation: LB Lewisham
NSPPSV106.7

I set out below officer level comments from the London Borough of Lewisham:

In relation to working with neighbours:

1 We acknowledge that through the South East London Duty to Cooperate group we have been working together under the duty, have entered into dialogue on a range of sub-regional and strategic cross boundary issues over a number of years and throughout the preparation of your Plan. We welcome the specific references given to this group and its outputs (e.g. 2014 South East London SHMA) in paragraphs 2.8, 2.9, 2.11 and 3.14 of your Duty to Cooperate Statement.

2 We welcome how your Plan acknowledges connectivity with your surrounding neighbours, especially in policies:

- IP1 Infrastructure – by mentioning working with neighbouring boroughs.
- P22 River Thames – by mentioning that development will relate to its neighbours, taking into account how the river meanders and the impact this can have on how buildings may be seen together.
- P48 Walking – by enhancing the borough’s walking networks by providing

Officer Response

Representation is noted.

footways, routes and public realm that enable access through development site and adjoining areas and by enhancing strategic networks such as the Green Chain walking route, and supporting new and existing green links across the borough and sub-regionally.

- P49 Low line routes (figure 4) – by recognising the low line routes in close proximity to the borough boundary with Lewisham.
- AV.05 Crystal Palace and Gypsy Hill Area Vision – by being mindful of cross boundary issues.

Individual
NSPPSV117.1

As someone actively involved in supporting the Peckham Coal Line, I am encouraged by the inclusion of the Peckham Coal Line in The New Southwark Plan (NSP).

We believe, now the feasibility stage of the project is wrapping up - there is an opportunity for the inclusion to go further than it currently does to further in its support for the implementation of the Peckham Coal Line (PCL). The delivery of the PCL is a stated aim of the planning authority, has wider Council support, and is encouraged by policies P49, AV.13 and NSP77, the feasibility study can provide further detail on site boundaries, benefits and opportunities to enable such delivery to be achieved. This can include what the PCL involves, how it may affect development or how development may affect it or contribute towards it.

Ideally a specific policy should be introduced that defines PCL with reference to a boundary plan with an explanation of the project and its aims. More detail can be found in the PCL feasibility study. The proposal is an elevated park, pedestrian and cycle route to connect Peckham Rye (Rye Lane) and Queen's Road Peckham (Queen's Road opposite Asylum Road), and to connect to the wider green and cycle route networks. This will promote better connections between these areas, improve public health and encourage sustainable modes of transport. Development should not

There is no need for an additional policy here as the associated plan shows where these routes are and each development will be assessed in relation to the specific low line route that is next to it. Hence, this policy in conjunction with Policy P27 is sufficient. It has also been added to the area vision maps

The NSP policy P49: Low line routes, specifically addresses the Peckham Coal Line. The Peckham Coal Line is designated as a low line route and indicated on a map. The policy states that 'Development must support the implementation of 'Low Line' routes across our borough. Development hindering or obstructing the implementation of 'Low Line' routes will not be permitted.' The Peckham Area Vision, AV.13.2 states that Development in Peckham should contribute towards the development of the Low Line and the Coal Line. In the NSP site allocations NSP77: Land between the railway arches (East of Rye Lane including railway arches) also makes clear that redevelopment of the site must support the implementation of the Peckham Coal Line.

<p>compromise the delivery of this route, and should contribute directly to it where directly affecting it. The PCL team would welcome the opportunity to discuss appropriate wording further. The additional policy could be located before or after policy P49. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered.</p> <p>If it will not be possible to include an additional policy, then the following changes to existing policy should be made:</p> <p>Policy P49: Add an inset to Figure 4 to define the indicative proposed boundary of the PCL route (the PCL team can provide an appropriate plan) and add a paragraph describing the PCL project as distinct from the 'Low Line Route', indicating the Coal Line - and its network of routes is the preferred solution. The low line is just one of these options.</p>	
<p>Individual NSPPSV151.15</p> <p>P49</p> <p>The development of Low Line routes across the borough is in principle supported. The policy should be supplemented with further detail in order that the implications for specific sites of delivery of the Low Line is properly understood. At present, it is not possible to confirm if development proposals will either hinder or obstruct implementation of the Low Line routes.</p> <p>Provide further detail as described at 5 above.</p>	<p>As the policy clearly says that "developments hindering the implementation of these low line routes will not be permitted" and the associated plan shows where these routes are, there is no need for an additional policy here. Each development will be assessed in relation to the specific low line route that is next to it. Hence, this policy in conjunction with Policy P27 is sufficient. It has also been added to the area vision maps</p>
<p>Organisation: TfL City Planning NSPPSV181.6</p> <p>The supporting text could mention that the Low Line routes are, in places, cycle routes also. For example 'Cycling on the Low Line will be encouraged and designed for where appropriate.'</p>	<p>The focus on the low line is a walking route and therefore we will not add reference to encouraging cycling on the low line. We have a number of cycleways in the borough which are identified on the vision and the site</p>

<p>Organisation: Peckham Coal Line NSPPSV304.1</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant Yes</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.</p> <p>The Friends of the Peckham Coal Line are supportive of the inclusion of the Peckham Coal Line in The New Southwark Plan (NSP).</p> <p>We believe, now the feasibility stage of the project is wrapping up - there is an opportunity for the inclusion to go further than it currently does to further in its support for the implementation of the Peckham Coal Line (PCL). The delivery of the PCL is a stated aim of the planning authority, has wider Council support, and is encouraged by policies P49, AV.13 and NSP77, the feasibility study can provide further detail on site boundaries, benefits and opportunities to enable such delivery to be achieved. This can include what the PCL involves, how it may affect development or how development may affect it or contribute towards it.</p>	<p>allocation maps.</p> <p>There is no need for an additional policy here as the associated plan shows where these routes are and each development will be assessed in relation to the specific low line route that is next to it. Hence, this policy in conjunction with Policy P27 is sufficient. . It has also been added to the area vision maps</p> <p>The NSP policy P49: Low line routes, specifically addresses the Peckham Coal Line. The Peckham Coal Line is designated as a low line route and indicated on a map. The policy states that 'Development must support the implementation of 'Low Line' routes across our borough. Development hindering or obstructing the implementation of 'Low Line' routes will not be permitted.' The Peckham Area Vision, AV.13.2 states that Development in Peckham should contribute towards the development of the Low Line and the Coal Line. In the NSP site allocations NSP77: Land between the railway arches (East of Rye Lane including railway arches) also makes clear that redevelopment of the site must support the implementation of the Peckham Coal Line.</p>
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Do you consider that the New Southwark Plan is unsound because it is not:-
Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Ideally a specific policy should be introduced that defines PCL with reference to a boundary plan with an explanation of the project and its aims. More detail can be found in the PCL feasibility study. The proposal is an elevated park, pedestrian and cycle route to connect Peckham Rye (Rye Lane) and Queen's Road Peckham (Queen's Road opposite Asylum Road), and to connect to the wider green and cycle route networks. This will promote better connections between these areas, improve public health and encourage sustainable modes of transport. Development should not compromise the delivery of this route, and should contribute directly to it where directly affecting it. The PCL team would welcome the opportunity to discuss appropriate wording further. The additional policy could be located before or after policy P49. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered.

If it will not be possible to include an additional policy, then the following changes to existing policy should be made:

Policy P49: Add an inset to Figure 4 to define the indicative proposed boundary of the PCL route (the PCL team can provide an appropriate plan) and add a paragraph describing the PCL project as distinct from the 'Low Line Route', indicating the Coal Line - and its network of routes is the preferred solution. The low line is just one of these options.

Regardless of whether the additional policy is introduced or not, the following changes to existing policy should be also made:

Policy AV.13: at the sixth bullet add “Peckham” before “Coal Line” and cross-refer to where this is defined at Policy P49.

Individual
NSPPSV309.1

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

As someone actively involved in supporting the Peckham Coal Line, I am encouraged by the inclusion of the Peckham Coal Line in The New Southwark Plan (NSP).

We believe, now the feasibility stage of the project is wrapping up - there is an opportunity for the inclusion to go further than it currently does to further its support for the implementation of the Peckham Coal Line (PCL). The delivery of the PCL is a stated aim of the planning authority, has wider Council support, and is encouraged by policies P49, AV.13 and NSP77, the feasibility study can provide further detail on site boundaries, benefits and opportunities to enable such delivery to be achieved. This can include what the PCL involves, how it may affect development or how development may affect it or contribute towards it.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There is no need for an additional policy here as the associated plan shows where these routes are and each development will be assessed in relation to the specific low line route that is next to it. Hence, this policy in conjunction with Policy P27 is sufficient. It has also been added to the area vision maps

The NSP policy P49: Low line routes, specifically addresses the Peckham Coal Line. The Peckham Coal Line is designated as a low line route and indicated on a map. The policy states that 'Development must support the implementation of 'Low Line' routes across our borough. Development hindering or obstructing the implementation of 'Low Line' routes will not be permitted.' The Peckham Area Vision, AV.13.2 states that Development in Peckham should contribute towards the development of the Low Line and the Coal Line. In the NSP site allocations NSP77: Land between the railway arches (East of Rye Lane including railway arches) also makes clear that redevelopment of the site must support the implementation of the Peckham Coal Line.

Ideally a specific policy should be introduced that defines PCL with reference to a boundary plan with an explanation of the project and its aims. More detail can be found in the PCL feasibility study. The proposal is an elevated park, pedestrian and cycle route to connect Peckham Rye (Rye Lane) and Queen's Road Peckham (Queen's Road opposite Asylum Road), and to connect to the wider green and cycle route networks. This will promote better connections between these areas, improve public health and encourage sustainable modes of transport. Development should not compromise the delivery of this route, and should contribute directly to it where directly affecting it. The PCL team would welcome the opportunity to discuss appropriate wording further. The additional policy could be located before or after policy P49. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered. If it will not be possible to include an additional policy, then the following changes to existing policy should be made:

Policy P49: Add an inset to Figure 4 to define the indicative proposed boundary of the PCL route (the PCL team can provide an appropriate plan) and add a paragraph describing the PCL project as distinct from the 'Low Line Route', indicating the Coal Line - and its network of routes is the preferred solution. The low line is just one of these options.

Regardless of whether the additional policy is introduced or not, the following changes to existing policy should be also made:

These changes will make the NSP sound by clarifying what the PCL is, and by making clear where developments will affect PCL and be expected to support and contribute to it. This will enable the delivery of the PCL, which is a stated aim. Without these changes delivery may be compromised as it was recently with the Consort Road plans (submitted in July 2017)

Representation	Officer Response
<p data-bbox="188 323 340 352">P50: Cycling</p> <p data-bbox="188 376 353 443">Individual NSPPSV18.12</p> <p data-bbox="188 488 1032 552">Policy P50 proposes the adoption of standards for the delivery of cycle parking in respect of development.</p> <p data-bbox="188 596 1106 767">Aviva and Galliard support the identification of standards for cycle parking subject to consideration of flexibility around quality, accessibility, design and innovation. As an example, the Council is looking at the provision of 'dockless' cycle hire and schemes of this nature could help to reduce the requirement for traditional cycle parking and a more effective use of space.</p>	<p data-bbox="1144 432 1458 461">Representation is noted.</p>
<p data-bbox="188 813 801 880">Organisation: Berkeley Homes (South East London) NSPPSV21.13</p> <p data-bbox="188 922 1113 1059">As supported by NPPF paragraph 17 we support the promotion of sustainable forms of transportation and the Council's objectives in terms of encouraging cycling in the Borough and increasing the number of persons who cycle and the number of overall trips undertaken by cycles in the Borough.</p> <p data-bbox="188 1104 1113 1347">It would however be helpful if the Policy could provide greater flexibility on the types of cycle stands that can be provided in developments. Double stacked stands are more efficient and make better use of land than 'Sheffield Stands'. Given the need to locate cycles in accessible and useable locations for cyclists, the 'land take' required to provide the necessary cycles is extensive and impacts significantly on the quality of the ground floor and active use onto streets.</p>	<p data-bbox="1144 922 2056 1023">This policy is adequate in its current form and any suitable alternative cycle parking facilities will be considered at the planning stage. Paragraph 3 of this policy already includes the phrase "conveniently located and accessible".</p>

<p>The need to cater for less ambulant cyclists can be incorporated into double stacked stands without harming the effective use of the land. The changes delivered through double stacked cycle racks versus standards will have significant benefits in terms of ownscape and public realm design.</p>	
<p>Organisation: GPE (St Thomas Street) NSPPSV67.5</p> <p>This policy encourages increased use of bicycles by requiring development to provide secure cycle parking for building users and visitors with commercial developments also required to provide showers and changing facilities that are proportionate to the number of cycle parking spaces. This commitment to cycling as a sustainable mode of travel is welcomed.</p> <p>Whilst the delivery of cycle spaces in public areas is supported generally, provision should not be detrimental to the quality of public realm proposals, especially in congested urban spaces. The location of external cycle parking facilities should consider the impact on the usability of public realm and the wider regeneration ambitions for an area generally. The policy should incorporate flexibility to promote cycle spaces in the public realm but not to the detriment of achieving high quality public spaces.</p>	<p>This policy in conjunction with Policy P11 is adequate and the need for keeping pedestrian routes free of any obstacles will be considered at the planning stage.</p>
<p>Organisation: London School of Economics and Political Science (LSE) NSPPSV113.6</p> <p>Representations by London School of Economics and Political Science on The draft New Southwark Plan: Regulation 19 Consultation</p> <p>These representations have been prepared on behalf of The London School of Economics and Political Science (LSE) regarding the draft New Southwark Plan Proposed Submission Version (NSP) consultation.</p>	<p>Representation is noted.</p> <p>This policy is adequate in its current form and any suitable alternative cycle parking facilities will be considered at the planning stage. Paragraph 3 of this policy already includes the phrase "conveniently located and accessible".</p>

LSE broadly supports the Council in its objectives to deliver new homes and jobs in the Borough. However to assist the Council in these objectives we set out a series of amendments aimed at ensuring the NSP is both legal and sound in order to promote good growth throughout the Borough.

Where suggestions are put forward these are designed to help guide the Council on the deliverability of the policies as well as their compliance with the London Plan and other strategic guidance. The Draft London Plan (DLP) was issued by the Mayor of London on 1st December 2017 and is subject to consultation up to the start of March 2018. Many of the key policies within the NSP reflect the wording of the Draft London Plan (DLP) 2017 which will maintain consistency across the policy framework. We have included references where appropriate to the DLP as well as the current adopted London Plan. LSE will be making representations on the Draft London Plan.

The London School of Economics and Political Science (LSE)

LSE ranks second on the world for social sciences (QS World University Rankings 2016-2017) and is classed as world leading for research. The School has a distinct student population, relative to its competitors, with a high proportion of one year Masters students, and a particularly international student body. There were 11,885 students in 2016-2017; 5082 undergraduates and 5,990 graduates. Over 8000 students were from overseas with a majority from non EU countries. The total number of students is set to increase and LSE's investment plans in its campus and student residences reflect its ambition to maintain its place and ranking as a world class university located at the heart of London.

Data shows that LSE postgraduate student demand for accommodation significantly surpasses supply. The School wishes to move to a position where it can guarantee an offer of accommodation to all new first year students. Currently LSE's guarantee is for first year undergraduate students only, while applications for appropriate accommodation from students with disabilities

continue to be prioritised. On current projections on student numbers, this amounts to a required capacity of between 6,000 - 7,000 bed spaces in the next eight years. Bed space numbers total 4,669 in 2017/18.

The overarching objective of LSE's Student Bed Space Strategy (SBSS) is to continue to attract the brightest students from around the world and enhance the student experience through the provision of a competitive residential offer. This is underpinned by several evidence-based principles including: wishing to make guaranteed offers for all first-year students; having a significant proportion of economy priced bed spaces to meet the demand for affordable accommodation; a location model that meets student demand for sustainable and accessible accommodation; and increasing the number of LSE owned and managed bed spaces.

The unique selling point of LSE residences is that they are within walking distance to the School which is firmly established, and will remain, in the heart of London. LSE therefore seeks growth in accommodation capacity in close proximity to the School campus. This location supports the business model of LSE's renowned Summer School and other student group lettings and also the commercial lettings outside of term time which allows for shorter student contracts and therefore a lower annual cost to students. LSE is keen to work in partnership with local authorities whose policies recognise the School's unique position and contribution.

Representations on behalf of the LSE

The principal area of concern for LSE is the impact the NSP will have on the opportunities to develop the LSE's property at Bankside House. Bankside House currently provides approximately 600 student beds in a converted office building behind Tate Modern. The LSE has a strategic plan to replace the current Bankside House with a substantially improved and larger facility which will cater for the strong demand for places at LSE. The importance of this site is the number of beds it provides and the close proximity to the main

LSE campus at Aldwych which is a short walk away.

Please note where paragraph numbers are given, these have been counted down from the relevant section referenced.

Policy P50 - Cycling

As supported by NPPF Paragraph 17 we support the promotion of sustainable forms of transportation and the Council's objectives in terms of encouraging cycling in the Borough and increasing the number of persons who cycle and the number of overall trips undertaken by cycles in the Borough. However, we would recommend the Council allow greater flexibility in the number of cycles required in certain locations and the provision of the types of cycle stands which are provided in schemes. This is particularly pertinent to LSE with their principle of ensuring all student residences are within walking distance of the School. Double stacked stands are more efficient and make better use of land than 'Sheffield Stands'. Given the need to locate cycles in accessible and useable locations for cyclists, the 'land take' required to provide the necessary cycles is extensive and impacts significantly on the quality of the ground floor and active use onto streets.

The need to cater for less ambulant cyclists can be incorporated into double stacked stands without harming the effective use of the land. The changes delivered through double stacked cycle racks versus standards will have significant benefits in terms of townscape and public realm design.

Individual
NSPPSV136.1

Only one of the six points in Policy 50 on Cycling addresses the way that planning policy will ensure sufficient space for the activity of cycling. This is inadequate to meet the challenge of increasing cycling as a less polluting and

Representation noted.

P50 now includes the Southwark Spine Cycling Corridor and the site

<p>healthier means of transport and to respond to growing demand.</p> <p>Five of the six points in this policy refer to measures to provide cycle parking. This is an important consideration but needs to support a policy to ensure adequate space is allowed for cycle routes themselves. The lack of a proper map of cycle routes makes it difficult to be sure how these are connected up and where gaps might be.</p> <p>The policy fails to recognise potential conflicts between cycling and other uses where cycle routes are created within parks and green space. Even leisure cycling can pose a risk to the safety of other green space users, especially vulnerable older, disabled users or children. This means that there should be a presumption against creating new cycle routes within parks and designated open space, except where there can be a clear separation between cyclists and non-cyclists and additional green space is provided of equal size and value to the space lost to the cycle route.</p> <p>Proposed changes</p> <p>Include a map of existing and planned cycle routes.</p> <p>Insert a sentence about the need for separation within between cyclists and other users of green space; and a recognition that cycle routes are transport infrastructure which cannot be routed through existing green space unless there is a corresponding increase in the size of that green space.</p>	<p>allocations and area vision maps now also include the existing cycle routes.</p> <p>The introduction of new cycle routes will be assessed against the principles of the recently adopted Movement Plan which aims to deliver suitable infrastructure that will support active travel.</p>
<p>Organisation: Peabody NSPPSV137.4</p> <p>NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION (DECEMBER 2017) REPRESENTATIONS SUBMITTED ON BEHALF OF PEABODY: NEWINGTON TRIANGLE (NSP42)</p>	<p>Representation noted. P50 policy in conjunction with Policy P11 is adequate in its current form and any suitable alternative cycle parking facilities will be considered at the planning stage especially also that Paragraph 2 of this policy already includes</p>

We are instructed by our client, Peabody, to submit representations in relation to the above site, in response to the London Borough of Southwark's (LBS) consultation on the New Southwark Plan (NSP): Proposed Submission Version.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how this presumption should be applied at the local level.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

In responding to the Council's current Regulation 19 consultation, we have also made reference to the guidance set out in paragraph 182 of the NPPF, which requires Local Plans to be sound. To meet this requirement they should be:

- Positively Prepared – be based on objectively assessed development requirements, consistent with achieving sustainable development.
- Justified – be the most appropriate strategy based on proportionate evidence.
- Effective – be deliverable over its period and based on effective joint working.
- Consistent with National Policy – enable the delivery of sustainable development in accordance with the policies of the NPPF.

The following representations have been prepared with regard to these criteria and we set out below our comments on the soundness of the New

the phrase "a reduced provision of the highest quality will be considered". This policy is adequate in its current form and any suitable alternative cycle parking facilities will be considered at the planning stage.

All other comments relating to different policies are responded to under relevant headings.

Southwark Plan Proposed Submission Version (2017), taking into account its compliance with national planning policy.

1. Previous Representations

We have made representations on behalf of our client in response to the previous consultation versions of the NSP, most recently being the NSP Preferred Options: New and Amended Policies (September 2017). The Newington Triangle site has been retained as an allocated site throughout the emerging versions of the NSP and we have sought to engage with the Council to ensure that the allocation is appropriate and will not restrict the emerging redevelopment proposals from coming forward. We have sought to ensure that that the site allocation is justified and effective.

2. The Site Allocation (NSP42: Newington Triangle)

The Newington Triangle site extends to approximately 1.34 hectares in size and is located within the Elephant & Castle Opportunity Area and Central Activities Zone (CAZ), as defined in the London Plan, Southwark UDP and Southwark Core Strategy. The site comprises brownfield land in an accessible location (PTAL 6a) and is not located within a Conservation Area and does not contain any listed buildings.

The site is allocated for comprehensive redevelopment in the NSP: Site NSP42. Acceptable uses for this site are considered to include residential, employment and retail floorspace. Commercial uses are required at ground floor level in order to provide active frontages along Newington Causeway and Borough Road.

We strongly support the allocation of this site for significant residential-led mixed use redevelopment which is considered to be consistent with the sites location within the Elephant and Castle Opportunity Area and CAZ. The site

allocation is considered to be consistent with the NPPF core principles which promote mixed use development and encourage multiple benefits from the use of previously developed urban land.

3. Development Management Policies

Draft Policy P1 'Affordable Homes'

Draft Policy P1 requires new development that will result in 11 or more new homes to provide a minimum of 35% affordable units. Peabody support this commitment to maximising affordable housing provision and this approach is considered to be consistent with both the adopted and emerging London Plan.

Our previous representations (NSP Preferred Options: New and Amended Policies, September 2017) suggested that the affordable housing tenure split should reflect the Elephant and Castle SPG (2012) and Affordable Housing SPD (2008) which set a tenure split of 50% social rented and 50% intermediate units. These adopted policy documents have set a precedent for affordable housing tenure split in the Elephant and Castle Opportunity Area.

We suggest there should be greater flexibility with regards to the proposed tenure split for affordable housing provision, based on local housing need. This would help to ensure the NSP is effective in its delivery of affordable housing.

Draft Policy P9 'Optimising delivery of new homes'

Draft Policy P9 sets out appropriate density ranges for new development in certain locations. The suggested density range for sites located within the CAZ is between 650 – 1,100 habitable rooms per hectare.

Whilst Policy P9 does provide some flexibility that in exceptional

circumstances development may exceed these density ranges where appropriate, the approach set out in the NSP is not consistent with the emerging London Plan. The Draft London Plan (December 2016) no longer specifies an appropriate density range, in contrast with Table 3.2 of the adopted London Plan. Instead emerging Policy D6 states “the optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to the site context, its connectivity and accessibility and the capacity of surrounding infrastructure”.

We therefore suggest that it is no longer appropriate to specify density ranges and this could the effect of unnecessarily straining development and design. It is important to allow sufficient flexibility in the wording of policies relating to density so as not to stifle development coming forward, in line with the aspirations of NPPF Paragraph 58 which seeks to optimise the potential of a site to accommodate development. Greater flexibility is therefore required to ensure that the NSP is effective in its delivery and consistent with regional and national planning policy.

Draft Policy P50 ‘Cycling’

Peabody consider that LBS should allow greater flexibility with regards to overall design specifications and requirements. As stated in our previous representations, the increased cycle space requirement will lead to a significant number of cycle parking spaces within developments and for large developments these numbers are considered to be excessive. There is a need to acknowledge that the way people travel by bicycle is changing, evidenced by Brompton folding bicycles and the recent introduction of dockless cycle hires. As such, cycle parking standards should not always result in a blanket requirement for all development and should instead be based on evidenced need.

We suggest that the provision of cycle parking spaces should be focused on

how the spaces can be used, and the quality of the provision rather than just quantity. Greater flexibility should be allowed for in the policy, taking into consideration other scheme benefits.

Organisation: Southwark Cyclists
NSPPSV164.12

P50: Cycling
Not justified
Not positively prepared
Not consistent
Not effective

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 as cycling is growing faster than its targets despite a failure by Southwark to deliver infrastructure such as the Spine.

The draft MTS has more ambitious targets, additional routes and better cycle parking standards than the NSP.

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.

C. Development will only be permitted where it:

- 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.
- ii. Contributes to a world class public realm which encourages cycling

This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. The Movement Plan, adopted 2019, sets out the need to improve walking and cycling routes to promote more active travel and healthier lifestyles. It recognises that safety is a key barrier to active travel, and aims to resolve it.

<p>wherever possible.</p> <p>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.</p> <p>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.</p> <p>v. Provides fully accessible links to public transport nodes as well as facilities and amenities.</p> <p>vi. Contributes towards improved wayfinding.</p> <p>vii. Promotes and contributes towards the introduction and expansion of cycle hire facilities and services</p>	
<p>Organisation: Tesco Stores Ltd NSPPSV180.11</p> <p>Our client is supportive of the principles set out in Policy P50 in its aim to increase cycling and promoting healthy and sustainable transport methods.</p> <p>However, the policy as currently worded states <i>‘for commercial uses, provide associated showers and changing facilities that are proportionate to the number of cycle parking spaces provided’</i>.</p> <p>Our client seeks clarification within Policy P50 as to what constitutes a commercial use. As an existing employer within the borough, many of whose employees are employed within existing small convenience stores provided</p>	<p>Noted.</p> <p>Commercial use refers to business and town centre use classes that are non-residential e.g. A and B Class.</p> <p>The plan intends to promote cycling as a sustainable mode of travel and so the cycle parking provisions are justified to promote the use of cycling.</p> <p>This policy refers to all new developments that come forward within the lifetime of the plan.</p>

by way of the change of use or reuse of existing buildings, it is contended that a requirement to provide showers and changing facilities within new convenience stores – in particular those to be provided within existing building – would be neither practical nor appropriate. Our client therefore seeks clarification that this requirement will be limited to new build 'B' Use Classes.

Additionally, in terms of cycle standards for retail uses, our client has concerns that long-term secure cycle spaces may be required for all new retail uses, including convenience stores in locations where cycle storage may be inappropriate. Our client suggests that the policy seeks coordinated cycle parking arrangements within an area to avoid the location of cycle storage in inappropriate locations, for example on pavements in busy town centre locations.

Furthermore, there are concerns that secure cycle parking for stores located in a high PTAL area would be used by commuters rather than by shoppers.

Moreover, our client seeks clarity as to whether this policy applies to non-residential new build development only or if it would also apply to change of use developments.

Organisation: TfL City Planning
NSPPSV181.7

Part 6 Provide a free two year cycle hire fob per dwelling where a docking station is located within 400m of the proposed development.

This is strongly supported, however question why this is two year period, and the similar car club membership provision is three years (Policy 52 Car Parking Part 3). This seems contrary to mode shift policies that support active modes of travel and suggest it should be the same period for both, or ideally the other way round ie three years cycle hire, two for car clubs.

The council will investigate how comparable the cost of providing free two year cycle hire fob per dwelling is to 3 years car club membership and if the latter cost is much greater than the former, then the two years cycle hire fob provision will be changed to 3 years.

<p>Organisation: TfL Commercial Development NSPPSV182.9</p> <p>The Council may wish to review these policies and related annexes in the light of the DLP parking standards and requirements.</p>	<p>The cycle and car parking standards in the New Southwark Plan are more stringent than in the Draft London Plan and therefore they remain in the NSP.</p>
<p>Individual NSPPSV238.4</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark <p>And:</p> <ol style="list-style-type: none"> 1. Southwark makes no provision for a linked up dense mature tree green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting. 2. A high quality, high density network of cycling & walking routes, that meet 	<p>This policy in conjunction with Policy P11 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion</p> <p>This policy does not require the suggested amendments because NSP Policies P11, P15, P48 and P50 address walking and cycling adequately and any new walking/cycling routes secured will have to be designed in accordance with the Council's design guides. NSP Policies P47, P52, P53 and P67 cover the other issues relating to minimising congestion, construction management and car parking. SP5 also refers to improving and protecting green spaces in the borough.</p>

<p>if not exceed the London Cycling Design Standards and provide for significant growth</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.”</p>	
<p>Individual NSPPSV240.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>Cycling within Southwark is already very difficult and if your plans go ahead it will be even worse. I do a 4.5mile journey every day from Peckham into the City and part of the journey I bring my son on my bike so hearing this news doesn't fill me with great confidence that our councillors have cyclists in mind with their new plans.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>

Individual
NSPPSV249.1

I'm a resident of Southwark - am I am shocked by the new Southwark plans poor provision for cycling. Southwark is a borough where the minority of residents own a car (I DO own a car) - and with poor tube and train provision for a huge swathe of it. The new Southwark plan is old fashioned, car centric and doesn't really represent how we need to adapt our city to a low carbon economy.

Additionally:

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

There is extremely poor provision for cycling - the word is name checked numerous times but there is very little in there of substance... it's extremely weak. I have commented elsewhere on what a pathetic waste of money the Southwark spine is in it's current form. We need safe and modern dutch style segregated routes and not the type of spineless rubbish put forward.

I would also like a clear commitment to make rat running more difficult across the borough.

Individual
NSPPSV250.1

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion. Also, all development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P52, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
 - It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
 - It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.
- As a long time Southwark resident and user of all modes including cycling, there is an opportunity for the borough to be a leader in healthy urban living.

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution

Individual
NSPPSV251.1

I am a cyclist and LCC member
I am concerned re cycle safety in Southwark.
The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

We suggest the Plan should be drawn up again to include:

2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough

Please keep cycle safety a big priority.

Individual
NSPPSV252.1

As a cyclist and Southwark resident, I am disappointed to see that the New Southwark Plan proposes to back track on the 2015 Southwark Cycling Strategy. By relying on the out of date 2009 transport strategy, it does not plan for the future or respond to the state of our roads and transport system as they exist today. The new plan does not positively tackle air pollution and has a lack of opportunities for daily physical activity, road safety and congestion in Southwark. I cycle in Southwark most days, but air pollution, congestion and road safety are my main concerns when I don't (particularly if it's not a route I usually take).

I'm already a converted cyclist – I don't see how this plan will convince other people to take up cycling as their main way of getting around Southwark, and will not encourage me to cycle more. Moreover, the New Southwark Plan fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan.

The Plan should be drawn up again to include:

2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth

I hope that Southwark Council will listen to residents' views and consider the plan again. As it currently stands, it is not fit for purpose.

Individual
NSPPSV253.1

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

Transport is patchy in parts of Southwark and a good cycling network is the best way to address this and make people healthier.

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport

Individual
NSPPSV254.1

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

After that, the more you can give some reasons in your own words why increasing cycling for all and reducing air pollution, the better. We suggest the Plan should be drawn up again to include:

2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport

<p>Individual NSPPSV255.1</p> <p>I live in Southwark, on the Brandon Estate near Oval.</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I began cycling to work in December 2017, and I am already fitter and happier. But I am regularly nearly hit by vehicles in badly designed sections of the road, and many of my friends would like to start cycling but frightened by the dangers of cycling. This is so important.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport</p>
<p>Individual NSPPSV256.1</p> <p>As a cyclist and Southwark resident, I am disappointed to see that the New Southwark Plan proposes to back track on the 2015 Southwark Cycling Strategy. By relying on the out of date 2009 transport strategy, it does not plan for the future responding to the state of our roads and transport system as it is today. The new plan does not appear to positively tackle air pollution and has a lack of opportunities for daily physical activity, road safety and congestion in Southwark. I cycle in Southwark everyday and air pollution and congestion are my main concerns. I'm already a converted cyclist – I don't see how this plan will convince other people to take up cycling as their main</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote</p>

<p>way of getting around Southwark. The New Southwark Plan fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan.</p> <p>The Plan should be drawn up again to include:</p> <p>2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth</p> <p>I hope that Southwark Council will listen to residents' views and consider the plan again as, as it currently stands, it is not fit for purpose.</p>	<p>more sustainable modes of transport</p>
<p>Individual NSPPSV257.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I suggest the Plan should be drawn up again to include:</p> <p>2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport</p>
<p>Individual</p>	<p>Representation is noted.</p>

NSPPSV258.1

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

The Plan should be drawn up again to include:

2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport

Individual
NSPPSV259.1

Please, we desperately need to tackle air pollution and do much more to promote safe cycling.

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

Please consider redrawing the Plan and including:

2. A high quality, high density network of cycling & walking routes, that meet

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport

<p>if not exceed the London Cycling Design Standards and provide for significant growth</p>	
<p>Individual NSPPSV260.1</p> <p>Please please make necessary changes to the plan...</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>As a cyclist, the friends that don't cycle tell me the only reason they dot take a bike to work/shops is because of the unsafe roads. So many more people would start cycling if our roads and borough were designed with cyclist safety in mind. This would then have a positive impact in so many ways for so many people including the air, streetlife, mental health and physical health, to name a few.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport</p>
<p>Individual NSPPSV261.1</p> <p>I was alarmed to learn that the council is about to approve a plan which will do a great disservice to, & possibly even harm the residents & cyclists of Southwark in the years to come.</p> <p>I urge you to consider the following ...</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p>

<p>“The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>In the light of these observations, please withdraw the proposed plan as it currently stands & design a new plan which actually meets the needs of local residents & cyclists for resubmission & consideration.</p>	<p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport</p>
<p>Individual NSPPSV262.1</p> <p>I believe that the New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> • It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan • It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons • It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>To make the Plan legal, I suggest that it should be drawn up again to include:</p> <ol style="list-style-type: none"> 2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport</p>

<p>growth</p>	
<p>Individual NSPPSV263.1</p> <p>I wish to register my objection to the new Southwark Plan. It is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>The borough desperately needs to encourage walking and cycling to improve air quality and the health of residents. I urge the council to reconsider the current plan</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and promote more sustainable modes of transport</p>
<p>Individual NSPPSV264.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>

<p>The Plan should be drawn up again to include:</p> <p>2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth</p>	
<p>Individual NSPPSV265.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. Cycling is a cheap and effective way to tackle air pollution. Currently I cycle with my kids every day to school through the green cycle paths in Russia dock. It would be great if you could plan more paths like these for pedestrians, cyclists and wildlife. I also think you should consider having cycle routes to all Southwark primary and secondary schools in an attempt to make sure that kids learn about healthy lifestyle and so we all have better air to breathe. 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>The existing cycle routes have been mapped to highlight the need to enhance them as development comes forward.</p>
<p>Individual NSPPSV266.1</p> <p>I live in the borough (19 Tresco Road, SE15 3PY) and have cycled around it for 30 years. I am appalled at the lack of progressive cycling provision in your Southwark plan. The Plan needs to comply with the 2014 national planning practice on</p>	<p>The plan is considered to be compliant with national and regional policies.</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution and the recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>

<p>transport which it does not. Clearly the way of moving people healthily and quickly with no polluting fumes, is cycling.</p>	
<p>Individual NSPPSV267.1</p> <p>I am contacting the planning department regarding the proposed borough wide planning and regeneration policy, this proposed policy raises serious concerns regarding green space and cycle lanes.</p> <p>The New Southwark regeneration and planning plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I hope that these concerns can be included in a workable strategic plan for our borough.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>
<p>Individual NSPPSV268.1</p> <p>The New Southwark Plan is not legally sound. It doesn't comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan</p> <p>It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p>

<p>It fails to plan positively to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.</p> <p>We should be encouraging more people to take up walking and cycling.</p>	<p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>
<p>Individual NSPPSV269.1</p> <p>I do not believe the New Southwark Plan to be legally sound for the following reasons:</p> <ol style="list-style-type: none"> 1. The New Southwark Plan does not comply with the 2014 national planning practice guidance on transport or policy as stated within the 2018 New London Plan. 2. The New Southwark Plan is not sufficiently based upon evidence. It references a 2009 transport strategy which is now out-of-date. Though the plan refers to the 2015 Southwark Cycling Strategy the plan does not include the envisioned cycle routes and does not justify their exclusion. 3. The New Southwark Plan is not positively prepared to tackle air pollution or the lack of opportunities for daily physical exercise required to manage obesity within the borough or road safety or congestion. Although the plan makes reference to encouraging walking, cycling and public transport use these strategies are not sufficiently described or committed for the plan to be considered positively prepared. <p>The New Southwark Plan should be drawn up to include the following plans:</p> <ol style="list-style-type: none"> a) A high density, high quality network of cycling and walking routes that meet or exceed the London Cycling Design Standards and provide for significant growth including measures to reduce motor traffic volumes along their lengths. There should be commitments on dates for design, 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>

<p>consultation and construction of these routes.</p>	
<p>Individual NSPPSV270.1</p> <p>I am extremely concerned to learn that Southwark is about to finalise a new borough-wide planning and regeneration strategy which has failed to take into account the submission by Southwark Cyclists in the last two rounds of consultation.</p> <p>I understand it has gone even further and now removed most of the new cycle routes proposed in its 2015 Cycling Strategy. Despite our borough having worse air pollution and obesity levels, the new plan is far less ambitious than other inner London boroughs like Camden and Hackney.</p> <p>I also understand the New Southwark Plan is not legally sound as: – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons –It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.</p> <p>Clearly cycling and walking should be encouraged to reduce congestion, air pollution and obesity.</p> <p>A clear priority should be the creation of a high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth</p>	<p>Representation is noted.</p> <p>Several rounds of consultation took place throughout the making of the plan. This is evidenced in the Consultation Report.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and encourage walking and cycling.</p>
<p>Individual</p>	<p>Representation is noted.</p>

<p>NSPPSV271.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>In general, plans should include infrastructure that encourages cycling/walking and reduces number of cars on the road - promoting cycling/walking is not only good for the physical health (through reduction of pollution and more exercise) but also promotes more community interaction.</p>	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>
<p>Individual NSPPSV273.1</p> <p>The New Southwark Plan is not legally sound:</p> <ul style="list-style-type: none"> -It fails to comply with the 2014 National planning practice guidelines on planning or policy i the 2018 New London Plan. -It is not justified by evidence: It relies on an out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons. -It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>The Plan should be drawn up again to include:</p> <ol style="list-style-type: none"> 2. A high quality, high density network of cycling and walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough. Existing cycle networks are also included in the area vision and site allocations maps so that they are enhanced and promoted as future development comes forward.</p>

<p>Individual NSPPSV274.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I would like to see a plan that increases the number of protected cycle routes in Southwark, reduces road traffic, and encourages a low-pollution culture of active travel.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough by increasing sustainable modes of transport and reducing the need for a car.</p>
<p>Individual NSPPSV275.1</p> <p>The New Southwark Plan is not legally sound. It doesn't comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan</p> <p>It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons</p> <p>It fails to plan positively to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.</p> <p>A new plan that puts active travel at the forefront is desperately needed.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough</p>
<p>Individual</p>	<p>Representation is noted.</p>

NSPPSV276.1

As a resident of Southwark and a daily commuting cyclist, I am concerned about the decisions Southwark are proposing and the lack of provision for cyclists.

I am a member of the London Cycling Campaign who have drawn my attention to the following:-

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

More relevant to todays transport and infrastructure needs would be to include the following: _

2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth

This would also align with the mayor of London's plans for Healthy Streets.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.

New cycle networks will be expected to meet if not exceed any relevant design policies.

Individual
NSPPSV277.1

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling

<p>– It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons</p> <p>– It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.</p> <p>Being able to cycle freely in the borough is important to me. My son has asthma, probably due to the pollution at his school (north Southwark) and where we live.</p> <p>I would like the plan to be drawn up again to include:</p> <p>2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth</p>	<p>Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>New cycle networks will be expected to meet if not exceed any relevant design policies.</p>
<p>Individual NSPPSV278.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> • It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan • It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons • It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>Central London has been transformed in recent years by positive improvements made by cycling - not just for cyclists but pedestrians and local businesses. It is disappointing that the New Southwark Plan does not yet recognise this and so Southwark will miss out on all of these benefits. Please be truly forward thinking and put real improvements to cycling provision at the heart of this plan.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>New cycle networks will be expected to meet if not exceed any relevant design policies.</p>

<p>Individual NSPPSV279.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>As a Southwark resident of over 15 years and a cycle commuter within the borough I am dismayed that the proposed planning policy is not prioritising cycling and walking routes. In fact the new proposal appears to be backtracking on some of the initiatives from the 2015 cycling strategy.</p> <p>Surely the Council should be promoting and realising new greener initiatives and healthier lifestyle for it's residents, not to mention tackling the legal requirements to curb our increasingly polluted air.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and prioritise cycling and walking.</p>
<p>Individual NSPPSV280.1</p> <p>It has come to my attention that Our much needed cycle routes may be in jeopardy in relation to the scale of development going on in the borough. Developers are not known for their consideration to much more than efficient profit making, so I wanted to make my opinion known that I truly hope the cycle routes are not just maintained but there are plans to improve and increase the safety, and that future developers/developments are held accountable for upholding the pledges make by the major and the</p>	<p>Representation noted.</p> <p>Existing cycle routes have been added to the site allocations and area vision maps to ensure that they are enhanced and protected as new development proposals come forward.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough and prioritise cycling and walking.</p>

<p>government in regards to cycling and a greener environment. I am a mum who takes her 4 year old and 8 year old to school each day on our bikes and I don't feel we have any place either on the road or pavement but we get by and make lots of apologies to pedestrians along our way. I don't want special treatment I just want to make sure local government is taking this matter seriously.</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. 	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p>
<p>Individual NSPPSV281.1</p> <p>As a resident and regular cyclist in Southwark I am writing to express my views on the New Southwark Plan.</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> • It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan • It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons • It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I also believe it fails to address the following items:</p> <ul style="list-style-type: none"> • creating a safe high quality and high density network of cycling routes that 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>New cycle networks will be expected to meet if not exceed any relevant design policies.</p>

<p>meets (or exceeds) the London Cycling Design Standards.</p>	
<p>Individual NSPPSV282.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>New cycle networks will be expected to meet if not exceed any relevant design policies.</p>
<p>Individual NSPPSV283.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons. This is completely unacceptable. – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. Surely this is just an error? <p>I understand staff are busy and spread thinly but please can you review these errors.</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>New cycle networks will be expected to meet if not exceed any relevant design policies.</p>

<p>In my family we have a car but try to cycle and walk for all our journeys. The opportunities are huge but the council must do more to control motor vehicle traffic and encourage other journeys. The council must take a lead. My kids and I all commute by bike and it is increasingly dangerous Im not sure how much longer we can do this.</p> <p>The Plan must be drawn up again to include all of the following please:</p> <p>A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth.</p>	
<p>Individual NSPPSV284.1</p> <p>Herewith I want to express my opinion that the New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I believe the plan should include:</p> <ul style="list-style-type: none"> - the 2015 cycling strategy that promised cycling ‘infrastructure that meets the needs of children, families, older people, disabled cyclists’ (Southwark Cycling Strategy, 2015), - a high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth, - save cycling for kids to their schools. 	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>It is not necessary to include reference to another adopted document or plan as new proposals will still be required to meet these standards.</p> <p>New cycle networks will be expected to meet if not exceed any relevant design policies.</p>

<p>Individual NSPPSV285.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>Cycle paths make areas more valuable. Bike facilities increase visibility of shops and sales.</p> <p>A city where lots of people cycle is (much) healthier, and happier and more social, less isolated, less polluted, significantly safer, and more welcoming to human beings, notably the old and young (https://www.theguardian.com/environment/bike-blog/2014/oct/16/why-cycling-is-great-for-everyone-not-just-cyclists).</p>	<p>Representation is noted.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough by prioritising active travel.</p>
<p>Individual NSPPSV292.1</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p>	<p>Representation is noted.</p> <p>The plan is compliant with national and regional policies.</p> <p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p>

<p>Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.</p> <p>The New Southwark Plan does not comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan, therefore it is not legally sound.</p> <p>The plan is not justified by evidence between it relies on an out-of-date transportation strategy from 2009. While it refers to the 2015 Southwark Cycling Strategy, it has eliminated many of the routes in it without reason. It fails to plan positively to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.</p>	<p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p>
<p>Individual NSPPSV294.2</p> <p>The Plan would be much more effective if it additionally includes:</p> <ul style="list-style-type: none"> - Cycling and walking routes between London Bridge and Canary Wharf, linking with the planned walking and cycling bridge over the river to Canary Wharf. This could provide a hopefully less polluted route compared to the 	<p>Representation is noted.</p> <p>As developments come forward, cycle hire scheme and improved pedestrian/cycle routes are looked at and where applicable and feasible these improvement measures will be sought as part of the relevant S.106 agreement. Hence, this policy in conjunction with Policies P11, P48, and P49</p>

<p>congested CS3 route north of the river.</p> <p>- Expanding the cycle hire bikes throughout the borough would also be very helpful. Especially again as part of a cycling and walking route south of the river between London Bridge and Canary Wharf (Southwark has a lot less public transport infrastructure than other London suburbs, especially west London, which the cycle hire scheme has been expanded to years ago.)</p> <p>- A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth. In particular a cycling commuter route to Canary Wharf, with hire bike docking stations along it.</p>	<p>is adequate</p>
<p>Individual NSPPSV324.9</p> <p>The NSP fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan. It has not been positively prepared as it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons.</p> <p>P50 should be updated to include:</p> <ol style="list-style-type: none"> 1. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries. 2. No new private car parking in new developments other than disabled and car club bays. 3. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth. 	<p>Representation is noted. The plan is compliant with national and regional policies.</p> <p>Construction management plans are decided on at planning application stage.</p> <p>P52 considers parking standards in line with national and regional requirements.</p> <p>This policy in conjunction with Policies P11, P52 and P53 is adequate and any other cycling-related issues will be considered at the planning stage. Policies P46, P47 and P67 address issues relating to minimising traffic congestion.</p> <p>SP5 has also been strengthened to 'increase, protect and improve green spaces</p>

<p>4. A green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting. These would bring P50 in line with the London plan and make other policies such as P66 effective.</p>	
<p>Individual NSPPSV327.11</p> <p>Cycling should be supported but existing routes and parking should be maintained for local residents. the lack of parking will deter families and older infirm. this will create an unbalanced society. the families , infirm and elderly are being discriminated against as they cannot walk cycle or use public transport easily.</p>	<p>This policy in conjunction with Policies P52 and P53 is adequate and cater for people with mobility impairments.</p>

Representation	Officer Response
<p>P51: Transport infrastructure improvements</p>	
<p>Organisation: GLA NSPPSV66.13</p> <p>The draft NSP should provide more detail about the proposed BLE, and link it to the phasing of proposed development in Old Kent Road. TfL has provided more detailed comment on the BLE in Annex 1.</p>	<p>This is now included in wording with the Old Kent Road vision (see responses to amended policies).</p>
<p>Organisation: LB Lewisham NSPPSV106.1</p> <p>I set out below officer level comments from the London Borough of Lewisham:</p> <p>In relation to the Bakerloo Line Extension:</p> <p>1 Your Plan supports the Bakerloo Line Extension (BLE) and recognises the development potential associated with this strategic piece of infrastructure, especially within policies P51 Transport Infrastructure Improvements and AV.12 Old Kent Road Area Vision. We also strongly support the commitment given to Phase 1 of the BLE to serve Old Kent Road, New Cross Gate and Lewisham and see it as a prerequisite to improve transport connectivity, increase the capacity and resilience of the transport network, reduce journey times, enhance PTAL levels and increase the share of journeys made by foot,</p>	<p>Noted, thanks.</p> <p>Additional wording has been added to the NSP vision for Old Kent Road. Please see attached: <u>Development will be phased based on the commitment and delivery of the Bakerloo Line extension. It is anticipated around 9,500 homes will be committed in Phase 1 (2018-2023) alongside enhancements to the existing public transport network prior to the confirmation of the Transport and Works Act Order for Bakerloo Line extension. The remaining 10,500 will be committed for Phase 2 (2023-2027) and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. A detailed phasing plan is included in the New Southwark Plan Implementation Plan and in the Old Kent Road Area Action Plan.</u></p> <p>The sites that are earmarked for tube stations have the following wording included within the NSP site allocation. We will update this as outlined in red.</p>

cycle or public transport. It will also provide opportunities to unlock development potential by supporting new jobs and homes in these locations. Overall, we feel that the BLE has the ability to transform both of our Boroughs and we look forward to continuing to work with you on this important strategic cross-boundary issue.

2 We feel strongly that your Plan would benefit by acknowledging “the need for joint funding and partnership working with key bodies such as the GLA, TfL and the London Borough of Lewisham in order to ensure timely delivery of the BLE, as proposed by the Mayor of London, and to work towards a clear and transparent agenda in terms of safeguarding the BLE route and delivering associated infrastructure and development sites alongside the BLE”.

3 We are also seeking greater certainty from the Mayor of London with a funding commitment to BLE Phase 2, as this will be crucial to unlocking more development opportunities to the south of Catford and within the wider South East area.

4 We welcome the specific reference in paragraphs 2.13, 2.18, 3.26 and 3.35 of your Duty to Cooperate Statement, to our joint work on the Bakerloo Line Extension and surrounding areas including Old Kent Road, Bermondsey Trading Estate, Bermondsey Diver Under and New Cross masterplan.

5 We note further details are set out in the Old Kent Road Area Action Plan / Opportunity Area Planning Framework, and if necessary we will comment on this separately in due course, prior to the end of consultation on 21st March 2018.

The site has the potential to host a new underground station as part of the Bakerloo Line extension. The station and tunnelling requirements will need to be incorporated into the site design.

Any required contributions are covered by Policy IP2 in the NSP (CIL and S106 planning obligations). We are continuing to discuss bus capacity contributions with TfL, and we will update our S106 and CIL SPD in due course to incorporate these figures. Healthy Streets is now referred to in the vision as per the attached NSP policies changes document.

Organisation: LB Lewisham
NSPPSV106.2

Noted, thanks.

I set out below officer level comments from the London Borough of Lewisham:

In relation to the Bakerloo Line Extension:

1 Your Plan supports the Bakerloo Line Extension (BLE) and recognises the development potential associated with this strategic piece of infrastructure, especially within policies P51 Transport Infrastructure Improvements and AV.12 Old Kent Road Area Vision. We also strongly support the commitment given to Phase 1 of the BLE to serve Old Kent Road, New Cross Gate and Lewisham and see it as a prerequisite to improve transport connectivity, increase the capacity and resilience of the transport network, reduce journey times, enhance PTAL levels and increase the share of journeys made by foot, cycle or public transport. It will also provide opportunities to unlock development potential by supporting new jobs and homes in these locations. Overall, we feel that the BLE has the ability to transform both of our Boroughs and we look forward to continuing to work with you on this important strategic cross-boundary issue.

2 We feel strongly that your Plan would benefit by acknowledging “the need for joint funding and partnership working with key bodies such as the GLA, TfL and the London Borough of Lewisham in order to ensure timely delivery of the BLE, as proposed by the Mayor of London, and to work towards a clear and transparent agenda in terms of safeguarding the BLE route and delivering associated infrastructure and development sites alongside the BLE”.

3 We are also seeking greater certainty from the Mayor of London with a funding commitment to BLE Phase 2, as this will be crucial to unlocking more development opportunities to the south of Catford and within the wider South East area.

Additional wording has been added to the NSP vision for Old Kent Road. Please see attached: Development will be phased based on the commitment and delivery of the Bakerloo Line extension. It is anticipated around 9,500 homes will be committed in Phase 1 (2018-2023) alongside enhancements to the existing public transport network prior to the confirmation of the Transport and Works Act Order for Bakerloo Line extension. The remaining 10,500 will be committed for Phase 2 (2023-2027) and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. A detailed phasing plan is included in the New Southwark Plan Implementation Plan and in the Old Kent Road Area Action Plan.

The sites that are earmarked for tube stations have the following wording included within the NSP site allocation. We will update this as outlined in red. *The site has the potential to host a new underground station as part of the Bakerloo Line extension. The station and tunnelling requirements will need to be incorporated into the site design.*

Any required contributions are covered by Policy IP2 in the NSP (CIL and S106 planning obligations). We are continuing to discuss bus capacity contributions with TFL, and we will update our S106 and CIL SPD in due course to incorporate these figures. Healthy Streets is now referred to in the vision as per the attached NSP policies changes document

4 We welcome the specific reference in paragraphs 2.13, 2.18, 3.26 and 3.35 of your Duty to Cooperate Statement, to our joint work on the Bakerloo Line Extension and surrounding areas including Old Kent Road, Bermondsey Trading Estate, Bermondsey Diver Under and New Cross masterplan.

5 We note further details are set out in the Old Kent Road Area Action Plan / Opportunity Area Planning Framework, and if necessary we will comment on this separately in due course, prior to the end of consultation on 21st March 2018.

Organisation: Port of London Authority
NSPPSV143.9

9. Policy P51: Transport Infrastructure Improvements

The PLA welcome reference to the proposed walking and cycling bridge from Rotherhithe to Canary Wharf. Please note that the PLA must be involved in any detailed discussions regarding this scheme as it progresses.

Organisation: Southwark Cyclists
NSPPSV164.13

P51: Transport
Infrastructure
Improvements
Not justified
Not positively
prepared
Not effective

Noted, thanks. All relevant stakeholders will be consulted at the planning application stage.

Representation is noted.

This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Transport improvement schemes will be achieved through collaboration with TfL.

An evidence bas is available online.

<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. 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 the proposed cycling and walking network, cycle hire, freight consolidation and bus priority</p>	
<p>Organisation: Tesco Stores Ltd NSPPSV180.12</p> <p>Our client supports the Council's ambition to improve public transport provision in the borough.</p> <p>However, our client contends that Policy P51 is ambiguous. In particular with regards to the funding, and delivery of, the proposed Bakerloo Line Extension along the Old Kent Road.</p> <p>It is thus suggested that the Bakerloo Line Extension is separated from P51 and be made a policy in its own right. The reasons for this are as follows:</p> <ul style="list-style-type: none"> · The Bakerloo Line Extension plans have not been confirmed by Transport for London. 	<p>Representation is noted.</p> <p>The NSP is a strategic document and so specific projects are not detailed in the plan, however, reference to the BLE is made throughout the OKRAAP.</p> <p>Each development in the area of this planned infrastructure will be assessed on its own merit and suitable level of financial contribution will be sought via CIL and S106 agreement. Hence, this policy does not need to be specific about funding sources/levels.</p>

<ul style="list-style-type: none"> · Considering the Bakerloo Line Extension separately from the other proposed transport improvements in Policy P51 would ensure that these other improvements can be secured in the event that the Bakerloo Line Extension is postponed or cancelled. · Crucially, our client raises significant concerns given the lack of consistency and transparency between the New Southwark Plan and TfL: · Our client seeks clarity as to whether the financing of the transport improvements of the borough will fall to developers. An agreed funding strategy between TfL and Southwark should be included within this suggested proposed policy. · Our client notes the ambiguous nature of Policy P51 and wishes to understand whether land is to be safeguarded for the proposed transport improvements across the borough. This should be made clear in the suggested new Bakerloo Line extension policy <p>In the absence of further clarification from TfL, our client reserves the right for further comments following future announcements and Bakerloo Line Extension developments from TfL and/or the Mayor of London.</p>	
<p>Organisation: TfL City Planning NSPPSV181.8</p> <p>The supporting text could be strengthened, for example why these schemes are needed, and to clarify further what ‘support’ means (Development must support the implementation of the following strategic transport projects and initiatives), for example safeguarding land.</p> <p>The case for a new station at Camberwell is currently being looked at by TfL, Network Rail and the Council. The supporting text should acknowledge this</p>	<p>Representation is noted.</p> <p>Design guidance is provided for all site allocations and all developments that are brought forward will be expected to protect and enhance cycle routes and all methods of sustainable transport.</p>
<p>Individual NSPPSV238.5</p>	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling</p>

The New Southwark Plan is not legally sound as:

- It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan
- It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark

And:

1. Southwark makes no provision for a linked up dense mature tree green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting.
2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth
3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets
4. No new private car parking in new developments other than disabled and car club bays
5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety

Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.

SP5 has been strengthened to protect green spaces.

Any proposal for new cycle infrastructure will be expected to meet any relevant design policy.

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

P52 sets out parking standards that are in line with national requirements.

Construction management plans are dealt with through the planning decision making process.

<p>rated lorries.”</p>	
<p>Individual NSPPSV241.1</p> <p>Hi Planning,</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>Increasing cycling for all and reducing air pollution, is vital to Central London, both for tourism and for those like me who live and work here. I suggest the Plan should be drawn up again to include:</p> <ol style="list-style-type: none"> 1. A green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting 2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth 3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets 4. No new private car parking in new developments other than disabled and car club bays 5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety 	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>SP5 has been strengthened to protect green spaces.</p> <p>Any proposal for new cycle infrastructure will be expected to meet any relevant design policy.</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>P52 sets out parking standards that are in line with national requirements.</p> <p>Construction management plans are dealt with through the planning decision making process.</p>

<p>rated lorries. Yours faithfully,</p>	
<p>Individual NSPPSV327.8</p> <p>The congestion at Denmark Hill needs to be addressed here. A new exit is essential.</p>	<p>The NSP is a strategic document and so individual issues will not be addressed in the plan.</p>

Representation	Officer Response
P52: Car parking	
<p>Organisation: Dulwich Society NSPPSV54.1</p> <p>Not fully comprehensive The policy is unsound as it does not address local circumstances. Proposed Change : The level of on-street provision should reflect car ownership levels in the area, levels of disability and the needs of traders who rely on customers being able to park.</p>	<p>P53 is in line national and regional parking standards.</p>
<p>Individual NSPPSV56.13</p> <p>These policies are not sound because they do not give appropriate guidance to ensure that a town centre has adequate car parking spaces for its viable functioning.</p> <p>We have the experience in Peckham town centre that planning policies are aiming to reduce the amount of car parking space in individual developments to the detriment of the town centre's need overall for car parking space both for commercial and shoppers/visitors' uses.</p> <p>Proposed changes to make the NSP sound:</p> <p>The policy should require an assessment of the impact of a development on the town centre's overall car parking needs and ensure that individual planning decisions do not reduce the required car parking space and its</p>	<p>Representation noted.</p> <p>P53 is in line national and regional parking standards.</p> <p>The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport.</p> <p>An evidence bas will be available online.</p>

<p>appropriate allocation within the town centre.</p>	
<p>Organisation: Southwark Cyclists NSPPSV164.14</p> <p>P52: Car Parking Not consistent 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.</p> <p>Parking and Car Free Development</p> <p>All new developments in the Borough must be car-free with on site parking limited to:</p> <p>i. Wheel chair accessible parking which is required to be provided in accordance with best practice</p>	<p>Representation noted.</p> <p>P53 is in line national and regional parking standards.</p> <p>The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport and this addresses the points raised</p> <p>An evidence bas will be available online.</p> <p>All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with P47 and P53, is adequate.</p> <p>The points raised in this representation are addressed through the combined SP5 policies and the newly adopted Movement Plan.</p>

standards, as set out in the London Plan

ii. Essential operational or servicing needs as justified through a Transport Assessment

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.

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.

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.

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.

E. All major residential developments will be required to contribute towards the expansion of the local car club network.

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

<p>shall be subject to the car-free and Transport Assessment need requirements within this policy.</p>	
<p>Organisation: Tesco Stores Ltd NSPPSV180.13</p> <p>Tesco are supportive of the aim of improving health and air quality in the London Borough of Southwark and London more widely for the benefit of all. Our client acknowledges the role that private vehicles perform in causing air pollution, and therefore accept that reducing private vehicular movements is key to improving air quality in the borough.</p> <p>Our client accepts that one measure to achieve a reduction in private vehicle movements is to seek a reduction in maximum parking standards. In principle, we are supportive of this approach however our client seeks to ensure the New Southwark Plan acknowledges that where existing retail supermarkets are to be redeveloped for mixed uses (including housing delivery) that a sufficient level of replacement parking is required to ensure the supermarket remains viable.</p> <p>If insufficient parking is provided within any such redevelopments, and the resultant impact on trade is too considerable, it is strongly contended that such sites will simply not be brought forward for redevelopment. Consequently, many opportunities for the delivery of new homes within the borough will be unavailable, and the opportunity to provide additional homes that London requires will not be realised.</p> <p>In relation to town centres, our client suggests that the New Southwark Plan should recognise that the provision of sufficient town centre car parking is essential to ensuring the vitality and viability of town centres, and their ability to compete with other town centres of similar scale.</p> <p>Parking associated with existing food stores is often utilised as general town centre parking, with shoppers / visitors using this parking not only when</p>	<p>Representation noted.</p> <p>P53 is in line national and regional parking standards. The car parking policy provides sufficient guidance for effective car parking</p> <p>The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking</p> <p>An evidence bas will be available online.</p> <p>All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with P47 and P53, is adequate.</p> <p>.</p>

doing their food shopping but also when visiting other town centre shops and facilities. The linking of such trips is fundamental in reducing vehicular trips, and creating vibrant and viable town centres. Therefore, as a result any reduction / removal of existing parking has the potential to adversely affect the vitality and viability of town centres.

The reduction / removal of car parking in relation to the replacement of existing food retail sites has the potential to result in less sustainable travel patterns and increased private vehicle mileage. It is contended that the removal / reduction of parking at one particular location will not remove the desire of food shoppers to access stores by car. Instead, it will reduce the number of stores that they can access by car in their particular locality, and as a result they would need to drive greater distances to be able to shop and park. The resultant increase in distance travelled in private vehicles is not compatible with the Council's objective to improve air quality.

Furthermore, not all food retail uses within / on the edge of town centres are located in areas with adequate on-street parking controls for all of the store's operational hours. The removal / reduction in dedicated parking in these locations could therefore potentially result in big increases in uncontrolled on-street parking, thereby having significant adverse impacts on existing residents and other users of the area.

Therefore in addition to the re-provision of adequate car parking, it is also contended that the provision of managed and appropriately located parking, is fundamental to the viability and vitality of our client's stores as well as wider town centres. As such, our client seeks greater flexibility within Policy P52 to ensure that parking associated with their stores can be managed and controlled. The absence of sufficient flexibility would likely affect the operations of our client's stores, and therefore our client's investment and operations decisions within the borough.

In conclusion, the provision of sufficient car parking within town centres is

fundamental in both ensuring the vitality and vibrancy of town centres, as well as enabling the release of key sites within town centres for mixed use redevelopment (in particular existing food stores which benefit from existing parking).

Therefore to ensure that these sites have the potential to help in meeting the Borough's housing need; our client suggests that greater flexibility is provided within the New Southwark Plan to allow adequate reprovision of car parking within mixed use redevelopments in town centre locations. The level of parking provided within any such developments should be based on a needs based assessment which takes account of the operations needs of the retail uses that are to be reprovided.

Organisation: TfL City Planning
NSPPSV181.9

Part 3 'requires' car club provision. NLP policy T6.1D states:
Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking
As such, P52 part 3 should be updated to reflect this.
The policy/supporting text should require development with car parking to have an approved car parking design and management plan, in line with DLP policy T6 G.

Part 6 could be extended to require developments to fund CPZ expansions where none exist and where there is the potential for overspill on-street car parking

Part 7 Electric Vehicle Charging states:
Where on-site Parking is permitted, the applicant must provide electric vehicle charging points (EVCP).
This is supported; however it is unclear if this means ALL parking spaces must provide EVCPs. It would be helpful if this was made explicit, or explained

Policy P53 (car parking) sets out that development must ensure off-street town centre car parking follows the requirements set in table 11 which, inter alia, provides alternative access to the use of a car by providing the required amount of car club bays parking spaces within the site. As such it is not required to add reference to point 3 that car club spaces may be considered appropriate in lieu of private parking. In addition Point 3.1 sets out that where off-street parking spaces are proposed/permitted, the number of spaces provided should be determined considering the anticipated demand for the parking spaces and tenure of the development and the quality and accessibility of the local public transport network and the access to local amenities. This therefore provides flexibility on the provision of off-street car parking.

Details of car parking design and management plan will be requested within any planning application as required. As this is a requirement of the Draft London Plan, it does not need to be set out in the New Southwark Plan.

It is not considered necessary to extend point 6 of the policy to require developments to fund CPZ expansions where none exist as we have a borough wide CPZ process that is covered and implanted through CIL and

<p>further in the supporting text.</p>	<p>S106.</p> <p>Policy P53 (car parking) has been updated to set out as a requirement for all developments to provide Electrical Vehicle Charging Points.</p>
<p>Organisation: TfL Commercial Development NSPPSV182.10</p> <p>The Council may wish to review these policies and related annexes in the light of the DLP parking standards and requirements.</p>	<p>All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out is adequate.</p>
<p>TH Real Estate NSPPSV183.6</p> <p>Draft Policy P52 refers to the provision of car parking within new development and refers to the standards in Annex 1 of the Plan. Table 3 of Annex 1 refers to ‘maximum car parking standards for non-residential uses’ and Table 4 sets out the ‘maximum car parking standards for town centres.’ With regard to “food supermarkets” of up to 2,500 sqm GFA to 4,000 sqm GFA in areas with a PTAL of 5-6, the emerging standards provide a maximum of one car parking space per 45 sqm. Other uses, such as hotel and leisure uses seek ‘no site specific parking’ and ‘zero’ parking for offices. In the case of the Morrison’s site on Walworth Road, which is allocated as a redevelopment site to include the retention of the existing supermarket use, it should be noted that the existing site comprises a total of 93 car parking spaces, which equates to approximately one space per 26 sqm of retail floorspace.</p> <p>Therefore, any redevelopment of the site to provide a mix of uses and retain the supermarket use should take into account both the existing provision of car parking spaces across the site and also the commercial operational requirements of new uses that are introduced to the site to meet land use objectives of the Plan. As such, car parking standards should be applied</p>	<p>Car parking policies set out adequate requirements for meeting the need for parking for operational needs. Specific sites will be considered as they are proposed for redevelopment through the planning application process.</p>

flexibly and consider existing individual site circumstances to determine an appropriate level of car parking to meet operational needs.

We trust that the above comments will be taken into consideration in the next stages of the preparation of the New Southwark Plan. Should you wish to discuss these representations further, please contact Julian Shirley or Paul Henry at the above office.

Organisation: Tiger Developments Ltd
NSPPSV191.8

The proposed LBS policy parking standards for residential (as set out in Annex 1) do not differentiate between the sizes of units (i.e. those for families). Further, a zero provision in PTAL 5-6 areas does not allow for the needs of blue badge holders and other essential car users, such as those that may need a car for work (some examples of these are: council staff who receive an Essential Car User Allowance due to their reliance on the use of a car, carers for people with disabilities, taxi/minicab drivers, builders/plumbers/electricians, highway/utilities maintenance, cleaners, couriers, shift workers, police, security staff and doctors/nurses on call) or the needs of families who already own and need the use of a car. Regardless of the PTAL of an area, it is imperative that an appropriate amount of car parking capacity is provided to ensure the viability of development schemes, and the ability to provide for a full cross section of residential needs. This cohort's travel needs cannot be simply provided by public transport measured by an Peak assessment of service frequencies. None of the supporting evidence demonstrates 'severe harm', as set out in the NPPF, caused through the provision of car parking at an appropriate level. In respect of providing all car parking spaces within the development, this should be also amended to provide some flexibility. There may be locations within the Borough where there is low on-street parking stress levels. In such locations, development may come forward where the additional demand on

Representation is noted.

P53 sets out the requirements for parking standards for disabled people. All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out is adequate.

The recently adopted Movement Plan aims to prioritise sustainable modes of transport over the use of the car and this is supported by policies set out in SP5

on-street parking can be shown not to result in any harm. Thus the flexibility should allow parking stress to be evaluated. The level of 'severe harm' should be assessed against the NPPF (Paragraph 32).

In respect of Sub-section 3, obligations are there to mitigate an impact which would otherwise result in harm from the development, without which the scheme would be deemed unacceptable. If the level of car parking provided for residents is at a level that either meets the likely demands or restricts it to a lower level, there is not, therefore, a specific or identifiable impact that is needed to be mitigated through providing car club membership to any of the future residents. It should also be noted that the main car club organisations that operate within Southwark (e.g. Ridelink, Zipcar, Ubeeqo, Hiyacar, easyCarclub) do not require a monthly or annual membership fee for standard membership. Thus, the proposed policy does not represent the current way in which the majority of Car Clubs operate. Placing a level of unknown cost onto a developer would be difficult to take into account in a Viability Assessment, unless a worse case is assumed, which may impact the delivery of affordable housing.

In relation to Sub-section 5.d, off street town centre car parking is not always able to provide bays for car clubs. This conflicts with having maximum lengths of stay and quick turnover of spaces, and management/pricing to discourage long stay parking. Furthermore, there may be specific aspects that could restrict the ability for access to car club vehicles in town centre car parks which would relate to non-24/7 access for security reasons; or in basement locations where the access to vehicles may be restricted by the lack of mobile phone signal.

Sub-section 7 relates to electric vehicle charging. Not all on-site car parking provisions should need to provide for electric car charging, especially if they are destinations rather than origins of journeys. In addition, this scale of electrical charging points can only be subject to constraints afforded by local utility capacity. Such constraints should be acknowledged by the final draft of this Policy.

<p>Individual NSPPSV237.9</p> <p>Car parking development strategy is divided into “Residential” and “Town Centre”, which does not recognise the full complexity of mixed-use inner-city environment. There are no provisions demonstrating awareness of the competition between car parking and housing provision onsite, or of the tension between car storage and vehicle access on-site. While there is a commitment to consider car club membership and provision, no minimum amounts are discussed and there is no commitment to reevaluate the planning of the kerbside in areas of high residential density, where car owners are in the minority and access governs the public interest ahead of storage. This brings the policy into conflict with the London Plan, which takes a stronger and more measurable line against proliferating car ownership.</p>	<p>Representation noted.</p> <p>The standards set out in the are parking policies are in line with national and regional requirements. All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p> <p>The recently adopted Movement Plan seeks to prioritise more sustainable modes of transport including active travel over the use of a car.</p>
<p>Individual NSPPSV242.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>May I suggest you consider the following...</p> <ol style="list-style-type: none"> 1. A green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting 	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>SP5 has been strengthened to protect green spaces.</p> <p>Any proposal for new cycle infrastructure will be expected to meet any relevant design policy.</p>

<p>2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth</p> <p>3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p> <p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p> <p>Many thanks</p>	<p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>P52 sets out parking standards that are in line with national requirements.</p> <p>Construction management plans are dealt with through the planning decision making process.</p>
<p>Individual NSPPSV251.4</p> <p>We suggest the Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV252.4</p> <p>The Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV254.4</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle</p>

<p>The Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV256.4</p> <p>The Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV257.4</p> <p>The Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV258.4</p> <p>The Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV259.4</p> <p>The Plan should be drawn up again to include:</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London</p>

<p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV264.4</p> <p>The Plan should be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV269.3</p> <p>c) Providing absolutely no new private car parking in new developments other than disabled and car club bays.</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV269.3</p> <p>The New Southwark Plan should be drawn up to include the following plans:</p> <p>c) Providing absolutely no new private car parking in new developments other than disabled and car club bays.</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV273.4</p> <p>The Plan should be drawn up again to include:</p> <p>4.No new private car parking in new developments other than disabled and</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and</p>

<p>car club bays.</p>	<p>TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV276.4</p> <p>More relevant to todays transport and infrastructure needs would be to include the following: _</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV277.4</p> <p>I would like the plan to be drawn up again to include:</p> <p>4. No new private car parking in new developments other than disabled and car club bays</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV283.4</p> <p>The Plan must be drawn up again to include all of the following please:</p> <p>No new private car parking in new developments other than disabled and car club bays.</p>	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Individual NSPPSV294.7</p> <p>The Plan would be much more effective if it additionally includes:</p> <ul style="list-style-type: none"> - No new private car parking in new developments other than disabled and car club bays. 	<p>The policy is consistent with national and regional policies. The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P52 which sets out requirements for cycle parking .All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>

<p>Individual NSPPSV327.10</p> <p>existing parking should be maintained for local residents. the lack of parking will deter families and older infirm. this will create an unbalanced society. the families , infirm and elderly are being discriminated against as they cannot walk cycle or use public transport easily.</p>	<p>All policies within the NSP will be applied to future developments and not existing</p>
<p>Representation</p>	<p>Officer Response</p>
<p>P53: Parking standards for disabled people and mobility impaired people</p>	
<p>Organisation: TfL Commercial Development NSPPSV182.11</p> <p>The Council may wish to review these policies and related annexes in the light of the DLP parking standards and requirements.</p>	<p>Noted.</p>
<p>Individual NSPPSV243.1</p> <p>To whom this may concern:</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>I cycle from my home in Peckham to work in Limehouse (Tower Hamlets) every day and cycle throughout Southwark at the weekends. It is so important that we continually improve the cycling provision in the borough</p>	<p>This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p> <p>Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.</p> <p>The recently adopted Movement Plan aims to deliver safe infrastructure to support active travel in the borough.</p> <p>SP5 has been strengthened to protect green spaces.</p> <p>Any proposal for new cycle infrastructure will be expected to meet any relevant design policy.</p>

to encourage more and more people to cycle (the only form of transportation that will reduce congestion on our roads). We need all new transport strategies to support those who are already doing their bit for the environment, offering more routes that protect us from the most congested and dangerous roads in the borough.

The Plan should be drawn up again, because it is so important that we get this right... It should be rewritten to include the following suggestions:

1. A green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting
2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth
3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets
4. No new private car parking in new developments other than disabled and car club bays
5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries."

I look forward to hearing about positive steps forward on this in due course.

Best wishes,

Policies P46, P47 and P67 address issues relating to minimising traffic congestion and pollution.

P52 sets out parking standards that are in line with national requirements.

Construction management plans are dealt with through the planning decision making process.