

Matter 1 – Procedural/legal requirements, including the duty to co-operate

From: Ralph Smyth

On behalf of: Southwark Cyclists

Issue 1

Whether the Council has complied with relevant procedural and legal requirements.

1.3 The plan period is to 2033. Assuming plan adoption in the second half of 2021 there would not be a 15-year plan period on adoption as required by NPPF2019 paragraph 22. Is it necessary for soundness that the plan period is extended to 2036 and that 1 April 2020 forms the basis for year 1 for measuring the housing land supply in accordance with NPPF paragraph 67?

It is clear that the plan period means the NSP cannot be sound. Much of the NSP's evidence base was already out of date, even before considering the net zero carbon target, so it is not possible simply to extend the plan period.

1.5 Having regard to the updated Equalities Impact Assessment July 2020 [Document EIP76], in what way does the Plan seek to ensure that due regard is had to the three aims expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

The NSP is particularly inadequate in relation to the interaction of transport (including negative impacts) and the Public Sector Equality Duty (PSED). The borough's lack of consideration of how to apply the PSED to transport, is very visible in Southwark's 2019 Movement Plan, where its equity mission is the only one not to have any actions listed. There are a lack of effective policies to ensure active travel networks are accessible from 8 to 80+ and for people of different abilities, such as those using special cycles. Further work is required by Southwark.

1.6 Is the approach to site selection in the New Southwark Plan justified, including the evidence in the Sites Methodology Paper [EIP82] and consistent with national policy and in general conformity with the London Plan?

No, it has failed to consider proposed or potential active travel networks, including both negative on them from construction and occupation of developments on those sites as well as positive potential for aligning new development, active travel and green infrastructure.

1.9 Are any modifications proposed, either on submission in January 2020, or subsequently, to address any issues of general conformity with the London Plan, in particular the strategy for the Old Kent Road Opportunity Area, the approach to Strategic Industrial Land (SIL) and the intensification of land currently in employment use?

There are numerous issues requiring resolution in particular: car parking standards, motor traffic reduction and freight.

Climate Change

1.10 Does the NSP accord with s19(1A) of the Planning and Compulsory Purchase Act (2004) (as amended) by including policies that are designed to secure that the development and use of the land in the Borough contribute to the mitigation of, and adaptation to, climate change?

No.

First it is necessary to ask what are the minimum mitigation targets in law and national policy, then whether a higher target locally is appropriate and then whether the NSP is effective delivering those targets.

The Climate Change Act 2008 was amended in 2019 to increase its 2050 target to net zero, a change described as a surprise by DfT's Chief Analyst, for instance. In December 2020, the Climate Change Committee (CCC) published its Sixth Carbon Budget (6CB) recommending a 68% reduction in 1990 emissions by 2030, a significant increase on 5CB and a 78% reduction by 2035. That effectively brought the target for an 80% reduction forward by 15 years. The Government has accepted the 2030 target and will need to legislate 6CB by June 2021. It is submitted that the 78% target is likely to be the minimum accepted since it is 'joining the dots' on the trajectory between 2030 and 2050. A failure to accept it would mean losing face before hosting COP26.

This suggests a minimum reduction of 75% by the end of the NSP plan period in 2033. There is no clear evidence as to the degree of carbon reduction the NSP, drafted in the era of the previous 80% by 2050 target, is likely to achieve. Likewise Southwark's draft Climate Strategy is vague even as to what it covers and provides zero information about the scale of emission reductions it could secure.

The New London Plan and *Zero Carbon London: A 1.5C compatible plan* (Mayor of London, 2018) both commit to net zero by 2050 (confusingly called zero carbon). This has been overtaken by the GLA's declaration of climate emergency, aiming for net zero by 2030. There is a lack of detail how much emissions will be reduced by, in other words how much net there will be. Carbon offsetting has challenges demonstrating additionality, while the CCC in 6CB suggested minimal potential for Carbon Capture and Storage from 2028, with other options arriving from 2033. In other words at a bare legal minimum the NSP must be consistent with a trajectory reducing emissions by 75%, ideally far more if to be consistent with Southwark and London policy.

It is no understatement to say this requires very radical change, more than tightening a few policies but applying hierarchies across different policy areas, a changed spatial approach and designing out many emissions sources in a decade. The London Cycling Campaign in its 2020 Climate Safe Streets report sets out how to do this for transport, through high quality cycle networks, road user charging and shared mobility.



██████████
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London Borough of Southwark
Via email

07 December 2018

Dear ██████

Transport for London
City Planning

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Southwark's Draft Local Implementation Plan

Thank you for submitting the London Borough of Southwark's draft Local Implementation Plan (LIP) to TfL for consultation. I would like to thank you and your colleagues for your hard work in producing the draft consultation LIP, and for following the guidance published by TfL earlier this year.

London's boroughs play a vital role in delivering the Mayor's Transport Strategy and helping to achieve the ambitious target of 80 per cent of all trips being undertaken by active, efficient and sustainable modes by 2041. That is why this third round of LIPs are so important in demonstrating how the Mayor's Transport Strategy will be implemented at a local level across the city.

Colleagues in TfL have reviewed your consultation draft submission. The intention of the assessment is to be constructive in assisting you to ensure that your final LIP has the best chance of achieving approval. I enclose here detailed comments and suggestions for your consideration ahead of the final LIP submission on 16 February 2019 for Mayoral approval.

Final approval of the LIP will be a matter for the Mayor. However, our review of the London Borough of Southwark's consultation draft LIP has identified a number of matters we consider necessary to be reviewed and strengthened. Addressing these issues in full is required for the London Borough of Southwark's LIP to meet the necessary standard we believe the Mayor would consider adequate for approval, in accordance with the conditions set out in section 146 of the GLA Act (1999).

A summary of our key comments is as follows:

- Southwark's innovative approach to this third round of LIPs is welcomed, as is the focus on encouraging people to move around Southwark in a more sustainable way and seeking to improve the quality of local streets.
- The overall themes and sentiments of the LIP are aligned to the MTS.

- The LIP needs to contain greater detail on plans for the local strategic cycle network.
- The LIP should be strengthened in relation to MTS Outcome 3 and reducing traffic levels. It is acknowledged that a specific action has been included on this, but the focus is largely on efficient freight in the current draft and there should be more on reducing private car trips.
- The LIP needs to contain greater detail on any plans or aspirations for public transport, in particular buses, and should also make reference to any aims relating to National Rail services that the borough may have, and how these might be improved in relation to MTS outcomes 5, 6 and 7.
- The LIP should include more detail on MTS Outcomes 8 and 9 and how the borough will support sustainable growth in homes and jobs. The current narrative around this is limited and the link between these outcomes and the associated borough Mission is not clear.
- In some additional cases the link between MTS outcomes and the borough's own mission statements and actions needs to be clearer. The borough should provide greater clarity in this respect, clearly linking borough Missions with MTS Outcomes, with particular regard to MTS outcomes 6 and the above mentioned Outcomes 8 and 9.

A list of detailed comments is enclosed in the annex to this letter.

We look forward to continuing to work with the London Borough of Southwark over the coming months as you finalise your LIP. My team will contact your officers to arrange a follow-up meeting to discuss our feedback. In addition, I request that you write to me confirming receipt of this letter and outline in your reply how you will amend your LIP in response to our comments.

Please do not hesitate to contact us going forward should anything in our response require clarification or if you need any support with the further development of the LIP. The key contacts for the London Borough of Southwark are:

[Redacted]
[Redacted]

Yours sincerely

[Redacted]

[Redacted]

[Redacted]

Email: [Redacted]

Direct line: [Redacted]

Third Local Implementation Plan – Consultation Feedback Form December 201

Borough name: Southwark

1.Overarching comments

- 1.1 The borough is asked to provide an index to the LIP, cross referencing responses to each requirement set out in the borough LIP guidance, as the standard template has not been used.
- 1.2 The borough is asked to provide an explanation of the approval process used to adopt the LIP.
- 1.3 The borough is asked to provide greater detail on the consultation process for the LIP and who will be consulted. This should identify key stakeholder groups and explain why it is important to consult with these. Greater detail about when consultation activities have taken place would be useful for the final submission.

2. Objective setting – Mode share

- 2.1 It is noted that the borough has set nine missions which are supported by a series of actions. These statements broadly demonstrate an alignment with the MTS, but need greater detail on how some of these will be delivered.
- 2.2 The borough should strengthen the links between mission statements and MTS outcomes.

3.Objective setting – MTS Outcomes

- 3.1 It is not always clear how a particular mission links to an MTS Outcome. Although each Outcome has been assigned to a mission it is not always clear why and in some instances potentially relevant Outcomes are missing. For example for Mission 1, some other MTS Outcomes are also relevant, such as Outcome 1 and potentially Outcome 2.
- 3.2 The borough should strengthen the LIP by creating clearer links between missions and MTS Outcomes, perhaps linking outcomes to more than one mission.
- 3.3 For MTS outcome 1:

- Mission 3 has been linked to the delivery of this outcome, but actions included as part of other missions will also help deliver against this outcome.
- **The LIP needs to contain more detail on how it plans to deliver a local strategic cycling network across the borough as this is not currently clearly demonstrated.**

3.4 For MTS Outcome 2:

- Mission 7 and a number of associated actions set out a commitment to delivering Vision Zero. This could be strengthened by including more specific reference to road danger reduction or Vision Zero in the mission statement itself.
- The borough should link this section more clearly with the analysis that was featured at the start of the document.

3.5 For MTS Outcome 3:

- **The LIP needs to be strengthened to address a reduction in traffic and car ownership more clearly. Presently the action included on reducing traffic has three points relating to freight and deliveries, but nothing on reducing car trips in the borough. This should be strengthened in the final submission.**

3.6 For Outcome 5:

- It is currently unclear how the associated Mission 8 will deliver this outcome. The associated mission appears to be focused on mitigating the impacts of major transport schemes on the borough and encouraging longer-term mode shift following station closures.
- The borough should make the link between Mission 8 and Outcome 5 stronger, or perhaps consider linking Outcome 5 to an alternative mission. A clearer demonstration of how this outcome will be achieved is needed.

3.7 For Outcome 6:

- The borough should add more detail around this outcome under the mission to which it has been linked. Whilst this mission does talk about improving accessibility it doesn't currently provide enough focus on public transport.
- The borough should add more detail on how it will deliver against this outcome.

3.8 For Outcome 7:

- It is currently unclear how the associated Mission 8 will deliver this outcome. The associated mission appears to be focused on mitigating the impacts of major transport schemes on the borough and encouraging longer-term mode shift following station closures.
- **The LIP should include more reference to bus services in the borough and any plans or aspirations around how these might be improved. There is currently not enough detail on buses and other public transport services such as National Rail.**

3.9 For Outcome 8 &9:

- **It is not clear how Mission 6 and action 14 in the plan will deliver against outcomes 8 and 9 to which they have been linked. The borough needs to include more detail in the narrative and some associated actions that demonstrate how it will deliver against these Outcomes. Currently the LIP does not sufficiently address how MTS outcomes 8 and 9 will be delivered at a local level.**

4. Borough targets

4.1 It is assumed that the borough has adopted as targets the trajectories set in the borough data pack. The LIP could be strengthened by adding in some additional detail or narrative to confirm that this is the case.

4.2 Following the moves to new collision reporting systems – the Case Overview and Preparation Application (COPA) for the Metropolitan Police Service and Collision Reporting And Sharing (CRASH) for the City of London Police – we have now completed initial back estimates for the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 (contained in the 2017 ‘Casualties in Greater London’ factsheet, available on the TfL website alongside supporting data tables at <https://tfl.gov.uk/corporate/safety-and-security/road-safety>).

4.3 We will issue a revised set of borough trajectories for Outcome 2 and Vision Zero and need boroughs to update their targets to reflect these new trajectories in their final LIP for 2022 and 2030 (2041 is unchanged at 0). The level of ambition remains unchanged, despite these revised figures. The borough is also asked to include the following text in the final LIP under Outcome 2 explaining the reasoning for the change in trajectories and targets:

‘The Metropolitan Police Service (MPS) introduced a new collision reporting system in November 2016 - the Case Overview and Preparation Application (COPA). The City of London Police also moved to the Collision Reporting And SHaring (CRASH) system in October 2015. This has had a number of impacts

on the data that is available to Transport for London (TfL), and the London Boroughs in the ACCSTATS database for collision investigation.

Under the new systems officers use an 'injury-based assessment' in line with DfT STATS 20 guidance and online self reporting is available. Both of these changes are expected to provide a better assessment of injury occurrence and severity but have made data collected from November 2016 onwards difficult to compare with earlier data.

TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 and this data has been used to update borough targets to align with those contained in the Mayor's Transport Strategy, namely a 65 percent reduction in KSIs by 2022 against the 2005-09 baseline, a 70 percent reduction in KSIs by 2030 against the 2010-14 baseline and zero KSIs by 2041. The targets contained in this final version of the LIP have been set against Outcome 2 for Vision Zero to reflect the reporting changes. The level of ambition remains unchanged, despite these revised figures.'

5. Delivery Plan – Longer term

5.1 The borough should provide more detail on how the list of schemes will support the boroughs long-term aspirations and how they align with the MTS vision and outcomes.

5.2 The borough should provide additional detail on schemes provided in the table (for example, expanding on 'Northern Ticket Hall')

6. Delivery Plan – 3 year programme

6.1 The borough should provide more commentary on how the three year programme was derived, including how potential interventions have been identified and prioritised and how the programme will be delivered so as to be consistent with the MTS.

7. Delivery Plan – 1 year programme and Pro-forma A

7.1 The pro-forma A submission contained no schemes linked to MTS outcomes 'Quality Public Transport' or 'Unlocking'. If the borough has schemes that could be linked to these outcomes this should be identified in the form.

7.2 The borough should provide greater detail on the specifics of each intervention, for example, the locations of proposed "calm streets", the number of demonstrator zones etc. It would also be useful to know whether any of

these schemes are designed to complement non- LIP funded schemes taking place in the borough.

7.3 The borough should provide more detail on the origin and prioritisation behind the annual interventions and more information on practical considerations. Commentary should also be provided on how TfL's business plan and third party actions could affect the delivery of borough objectives.

Borough: Southwark

Overall assessment: *Adequate / Inadequate*

Calibrated (Yes/No): _____ Date: _____

Transport Strategy Assessor: [REDACTED] _____ Date: _____

Network Sponsorship Assessor: [REDACTED] _____ Date: _____

LIP stage: <u>Draft for Mayoral Approval</u> [TS Assessor to complete once NS assessment received]
Has the borough fully addressed the required amendments outlined in our response to their consultation draft LIP submission?
Yes in relation to the required changes. A number of the suggested points have not been addressed. This is still a draft version though pending update from consultation feedback.
Have any other amendments been made to the draft LIP in response to the wider consultation? If so, do they affect the adequacy of the draft LIP?
Yes – where strong support was demonstrated across a number of areas the borough have chosen to strengthen the LIP. This does not take away from the adequacy of the LIP.
Has the borough met their statutory requirements regarding consultation and undertaking a Strategic Environmental Assessment?
An IIA was submitted alongside the draft.
Overall recommendation for Mayoral Approval:
It is recommended that the Mayor approve Southwark’s LIP. The LIP demonstrates a commitment to the key outcomes of the MTS. It should be viewed in the context of the boroughs Movement Plan which is a bolder document and from which the LIP draws its key policies and proposals. The Movement Plan acts as a long-term transport strategy for the borough. Overall the submission demonstrates a commitment to deliver the MTS at a local level.

I. Has Chapter One of the draft LIP been updated following the consultation?

<u>Guidance Requirement</u>	<u>Assessment [NS]</u> <i>(yes / no, including reason if no)</i>
<i>Requirement 2 – Has the borough included in their LIP an explanation of the statutory background of the LIP process?</i>	<u>Yes</u>
<i>Requirement 3 - Has the borough explained the democratic processes taken to approve the submission of the LIP at a borough level?</i>	No- this isn't included.
<i>Requirement 4 - Have all the statutory consultees been consulted? i.e. The</i>	Yes the borough

relevant Commissioner or Commissioners of Police for the City of London and the Metropolis; TfL; Such organisations representing disabled people as the boroughs consider appropriate; Other London boroughs whose area is, in the opinion of the council preparing the LIP, likely to be affected by the plan. Have other additional consultees been involved in either the preparation of, or the consultation on, the LIP? Has the borough used feedback from the consultation process to amend the document?	has carried out a full consultation on the LIP alongside the borough's Movement Plan. They have outlined key areas that they have strengthened in response to the consultation.
<i>Requirement 5</i> - Has the borough produced a statement on how impact assessments e.g. the Strategic Environmental Assessment and Equality Impact Assessment have influenced preparation of the LIP? There is a requirement to undertake a Strategic Environmental Assessment and it is recommended that an Equalities Impact Assessment is also done (which addresses the borough's Public Sector Equality Duty). The boroughs are required to consider whether it is appropriate for the LIP to be assessed against other matters, for example crime and disorder, health, economic and business issues, air quality and climate change.	Yes, though not much detail about how the assessments have informed the LIP has been provided.
<i>Requirement 6</i> - Has the borough submitted the LIP in accordance with the requirements and timetable? Name of document; Submitting document to TfL; Submission milestones	Yes LIP has been submitted broadly in-line with requirements, although behind schedule.

2. Assessment of adequacy

- Has the borough fully addressed the required amendments outlined in our response to their consultation draft LIP submission? (*amendments upon which adequacy is contingent*)

Required Amendment (copied from our consultation response letter)	Amendment in final draft LIP (summary of amendment made)	Adequate / Inadequate (including reason if inadequate)
Borough Objectives [TS]		
It is noted that the borough has set nine missions which are supported by a series of actions. These statements broadly demonstrate an alignment with the MTS, but need greater detail on how some of these will be delivered.	<ul style="list-style-type: none"> • A short narrative has been added against each mission to illustrate how it will deliver for the MTS in addition to the linking relevant objectives. Additional points have been added to 	Adequate.

	<p>a number of actions. Although more detail could still have been included, this has strengthened the submission.</p>	
<p>The LIP needs to contain more detail on how it plans to deliver a local strategic cycling network across the borough as this is not currently clearly demonstrated.</p>	<ul style="list-style-type: none"> Two maps have been added to this section of the LIP outlining the existing and future cycling and also walking networks. Probably just about adequate, but there isn't a great deal of narrative to accompany the maps. 	Adequate
<p>For MTS Outcome 3: The LIP needs to be strengthened to address a reduction in traffic and car ownership more clearly. Presently the action included on reducing traffic has three points relating to freight and deliveries, but nothing on reducing car trips in the borough. This should be strengthened in the final submission.</p>	<ul style="list-style-type: none"> This has been strengthened – Action 7 in the new submission has been re-worded to explicitly address reducing car ownership and use. Previously this action was vague and referred to a Street Wise Framework and reducing car ownership wasn't covered. 	Adequate
<p>It is not clear how Mission 6 and action 14 in the plan will deliver against outcomes 8 and 9 to which they have been linked. The borough needs to include more detail in the narrative and some associated actions that demonstrate how it will deliver against these Outcomes. Currently the LIP does not sufficiently address how MTS outcomes 8 and 9 will be delivered at a local</p>	<ul style="list-style-type: none"> Outcomes 2, 4 and 8 have now been linked to Mission 6, steering away from a focus on Outcomes 8 and 9 alone. This mission and the associated action would deliver against these MTS outcomes. Outcome 9 is now linked to Mission 5 which does appear to 	Adequate.

level.	have been strengthened to address development in the borough (to an extent).	
Borough Targets [TS]		
<p>Following the moves to new collision reporting systems – the Case Overview and Preparation Application (COPA) for the Metropolitan Police Service and Collision Reporting And Sharing (CRASH) for the City of London Police – we have now completed initial back estimates for the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 (contained in the 2017 ‘Casualties in Greater London’ factsheet, available on the TfL website alongside supporting data tables at https://tfl.gov.uk/corporate/safety-and-security/road-safety).</p> <p>4.3 We will issue a revised set of borough trajectories for Outcome 2 and Vision Zero and need boroughs to update their targets to reflect these new trajectories in their final LIP for 2022 and 2030 (2041 is unchanged at 0). The level of ambition remains unchanged, despite these revised figures. The borough is also asked to include the following text in the final LIP under Outcome 2 explaining the reasoning for the change in trajectories and targets: CHECK TEXT ADDED</p>	<ul style="list-style-type: none"> • A version of the provided text has been added in the End Notes at the back of the LIP, linked to via a footnote in the main LIP. Wording used is not the same, but states the same message. 	Adequate
Delivery Plan [NS]		
Other [TS / NS]		
The borough is asked to provide an index to the LIP, cross referencing responses to each requirement set out in the	<ul style="list-style-type: none"> • Borough has not provided an index, but has marked up where each requirement has 	Partially adequate.

borough LIP guidance, as the standard template has not been used.	been met within the LIP. It's not clear of an index will be provided on final submission.	
The borough is asked to provide an explanation of the approval process used to adopt the LIP.	<ul style="list-style-type: none"> This does not appear to have been addressed. 	Inadequate
The borough is asked to provide greater detail on the consultation process for the LIP and who will be consulted. This should identify key stakeholder groups and explain why it is important to consult with these. Greater detail about when consultation activities have taken place would be useful for the final submission.	<ul style="list-style-type: none"> More detail has been added on the consultation process. This includes the number of responses received and also the key changes they have made as a result. 	Adequate.

- Has the borough addressed the other comments / amendments outlined in our response to their consultation draft LIP submission?

Amendment (copied from our consultation response letter)	Amendment in final draft LIP (summary of amendment made)	Comments (met / not met)
Borough Objectives [TS]		
The borough should strengthen the links between mission statements and MTS outcomes.	<ul style="list-style-type: none"> An additional paragraph has been added to each mission to better demonstrate how each mission will deliver for the MTS. Some Outcomes have also been moved to different missions where they better sit. 	Met
It is not always clear how a particular mission links to an MTS Outcome. Although each Outcome has been assigned to a mission it is not always clear why and in some instances potentially relevant Outcomes are missing. For example for	<ul style="list-style-type: none"> This has been addressed. Outcomes 1 and 2 were added to Mission 1 and additional outcomes have also been added elsewhere. Some Outcomes 	Met

<p>Mission 1, some other MTS Outcomes are also relevant, such as Outcome 1 and potentially Outcome 2.</p> <p>The borough should strengthen the LIP by creating clearer links between missions and MTS Outcomes, perhaps linking outcomes to more than one mission.</p>	<p>have also been moved to sit beneath different missions.</p> <ul style="list-style-type: none"> • Although more could have been said, additional text has been added for each Mission outlining how it will deliver the MTS 	
<p>For MTS Outcome 2:</p> <p>Mission 7 and a number of associated actions set out a commitment to delivering Vision Zero. This could be strengthened by including more specific reference to road danger reduction or Vision Zero in the mission statement itself.</p> <p>The borough should link this section more clearly with the analysis that was featured at the start of the document.</p>	<ul style="list-style-type: none"> • The first point has not been addressed – but additional text has been added to better link with vision zero • Section is extensive. 	Met
<p>The borough should make the link between Mission 8 and Outcome 5 stronger, or perhaps consider linking Outcome 5 to an alternative mission. A clearer demonstration of how this outcome will be achieved is needed.</p>	<ul style="list-style-type: none"> • Additional text has been added outlining how the mission will deliver against the MTS outcomes. Really Outcomes 8 and 9 should have been linked here as it talks about Good Growth in the first action. 	Partially met
<p>The borough should add more detail around this outcome under the mission to which it has been linked. Whilst this mission does talk about improving accessibility it doesn't currently provide enough focus on public transport.</p> <p>The borough should add more detail on how it will</p>	<ul style="list-style-type: none"> • Additional details have been provided for all Missions 	Met

deliver against this outcome.		
The LIP should include more reference to bus services in the borough and any plans or aspirations around how these might be improved. There is currently not enough detail on buses and other public transport services such as National Rail.	<ul style="list-style-type: none"> LIP still lacks detail on buses – borough raised post-comments, that they weren't clear on what they could say about buses as they viewed this as a largely TfL concern. Some text has been added under Mission 8. 	Not met.
Borough Targets [TS]		
It is assumed that the borough has adopted as targets the trajectories set in the borough data pack. The LIP could be strengthened by adding in some additional detail or narrative to confirm that this is the case.	<ul style="list-style-type: none"> This does not appear to have been addressed, but was a suggested point. 	Not met
Delivery Plan [NS]		
The borough should provide more detail on how the list of schemes will support the boroughs long-term aspirations and how they align with the MTS vision and outcomes.	Greater detail is provided in the Long term intervention table, though no link is made between the schemes and the MTS or borough long term aspirations.	Met
The borough should provide additional detail on schemes provided in the table (for example, expanding on 'Northern Ticket Hall')	This detail is provided.	Met
The borough should provide more commentary on how the three year programme was derived, including how potential interventions have been identified and prioritised and how the programme will be delivered so as to be consistent with the MTS.	This commentary has not been provided.	Inadequate. There is no indication of the origin and priority of schemes or their alignment to MTS themes.
The pro-forma A submission contained no schemes linked to MTS outcomes 'Quality Public Transport' or 'Unlocking'. If the borough has schemes that could be linked to these outcomes this should be identified in the form.	Proforma A has not been resubmitted. Thus, this comment has not been addressed.	Inadequate. As Proforma A has not been resubmitted it is not possible to see if any schemes are proposed that support these MTS outcomes.
The borough should provide greater detail on the specifics of each intervention, for	The requested additional detail is not provided in the three year programme of investment	Adequate, though it would be beneficial to see the additional detail as initially

example, the locations of proposed "calm streets", the number of demonstrator zones etc. It would also be useful to know whether any of these schemes are designed to complement non- LIP funded schemes taking place in the borough.	and Proforma A has not been resubmitted. As such, this comment has not been addressed.	requested.
The borough should provide more detail on the origin and prioritisation behind the annual interventions and more information on practical considerations. Commentary should also be provided on how TfL's business plan and third party actions could affect the delivery of borough objectives.	Proforma A has not been resubmitted. As such, this comment has not been addressed.	Inadequate. As Proforma A has not been resubmitted there is no indication of the origin and priority of schemes or their alignment to MTS themes.
Other <i>[TS / NS]</i>		

3. Have any other amendments been made to the draft LIP in response to the wider consultation? If so, do they affect the adequacy of the draft LIP?

Yes / No <i>(including brief summary of any changes - borough objectives & targets [TS] / Delivery Plan [NS])</i>
A number of the key objectives have been strengthened in response to the consultation. This has enhanced the submission.

4. Targets *[TS]*

Outcome	Year	Trajectory	Target	Comment	Adequate (Y/N)
Overarching mode share aim – changing the transport mix					
Active, efficient and sustainable (walking, cycling and public transport) mode share	2021	80	80		Y
	2041	87	87		Y
Healthy Streets and healthy people					
Outcome 1: London's streets will be healthy and more Londoners will travel actively					

1a: Proportion of London residents doing at least 2x10 minutes of active travel a day	2021	47	47		Y
	2041	70	70		Y
1b: Proportion of Londoners living within 400m of the London-wide strategic cycle network.	2021	60	60		Y
	2041	95	95		Y
Outcome 2: London's streets will be safe and secure					
2a: Deaths and serious injuries (KSIs) from road collisions, base year 2005/09 (for 2022 target).	2022	90	90		Y
2b: Deaths and serious injuries (KSIs) from road collisions base year 2010/14 (for 2030 target).	2030	62	62		Y
	2041	0	0		Y
Outcome 3: London's streets will be used more efficiently and have less traffic on them					
3a: Vehicle kilometres in given year. Base year 2015. Reduce overall traffic levels by 10-15 per cent.	2021	696	696		Y
	2041	556-591	556-591		Y
3b: 10 per cent reduction in number of freight vehicles crossing into central London in the morning peak period (07:00am - 10:00am) by 2026.	NA	NA	NA	NA	NA
3c: Total cars owned and car ownership per household, borough residents. Base period 2013/14 - 2015/16.	2021	57100	57100		Y
	2041	54800	54800		Y
Outcome 4: London's streets will be clean and green					
4a: CO2 emissions (in tonnes) from road transport	2021	135100	135100		Y
	2041	36300	36300		Y

within the borough.					
4b: NO _x emissions (in tonnes) from road transport within the borough.	2021	200	200		Y
	2041	30	30		Y
4c: PM10 and PM2.5 emissions (in tonnes) from road transport within borough.	2021	43/20	43/20		Y
	2041	23/11	23/11		Y
A good public transport experience					
Outcome 5: The public transport network will meet the needs of a growing London					
5: More trips by public transport - trips per day by borough of residence. Reported as 3yr moving average.	2021	299	299		Y
	2041	387	387		Y
Outcome 6: Public transport will be safe, affordable and accessible to all					
6: Reduce the difference between total public transport network journey time and total step-free public transport network					
	2041	4	4		Y
Outcome 7: Journeys by public transport will be pleasant, fast and reliable					
7: Annualised average bus speeds	2021	8.0-8.2	8.0-8.2		Y
	2041	8.3-9.1	8.3-9.1		Y
New homes and jobs					
Outcome 8: Active, efficient and sustainable travel will be the best options in new developments					
Outcome 9: Transport investment will unlock the delivery of new homes and jobs					

5. Assessment summary – policy consistency and adequacy of the borough objectives

The LIP submission, as it stands, does demonstrate and alignment with the MTS aims and Outcomes. It is supportive of the key areas of increasing active travel and vision zero, and does show support for public transport provision. On the latter it remains quite weak though with a lack of real discussion around buses for example. This appears to be more down to the fact that borough sees public transport as something delivered by other partners as opposed to an opposition to these services. More detail has been added on future cycling plans, but this could have been stronger.

The LIP sits alongside the borough's Movement Plan, which is in essence a transport strategy. The Movement Plan is generally a stronger document and gives a better indication of the borough's aims and aspirations. The LIP should be viewed alongside this and the borough has made sure the two are closely linked.

The Mission the borough has set are as follows (with the MTS Outcomes and borough actions that they have linked to each mission):

Mission 1: Our mission is for equality in movement (MTS Outcomes 1,2,6 & 7)

Mission 2: Our mission is for movement to benefit mental wellbeing (MTS Outcomes 1,2 & 6)

Action 1: reduce noise

Action 2: reduce visual stimuli

Action 3: Cultivating positive experiences

Mission 3: Our mission is for movement to benefit physical health (MTS Outcome 1)

Action 4: Infrastructure to support a culture of active travel

Action 5: Getting active

Action 6: Staying active

Mission 4: Our mission is to be flexible in how we manage our streets (MTS Outcome 3)

Action 7: Reduce private car ownership and usage through increasing parking control

Action 8: using time to manage

Action 9: Managing our kerbside

Mission 5: Our mission is for movement to support businesses to thrive and prosper (MTS Outcomes 3, 8 and 9)

Action 11: Getting the infrastructure right

Action 12: Manage space efficiently

Action 13: Support places that excite and attract people

Mission 6: Our mission is for neighbourhoods to have places for people to connect (MTS Outcomes 2,4 & 8)

Action 14: Creating opportunities for people to connect

Mission 7: Our mission is for all people to have a positive experience on our streets (MTS Outcomes 2,3 & 4)

Action 15: reduce traffic on our roads

Action 16: Reducing exposure to poor air quality

Action 17: Improve road safety towards Vision Zero on killed and serious injured in our roads

Action 18: Improve safety and sense of safety

Action 19: Improving conditions for which our roads are a workplace

Mission 8: Our mission is to manage change and make the transition a positive experience for people (MTS Outcomes 5 & 7)

Action 20: A changing borough (growth in homes and jobs)

Action 21: Responding to new transport infrastructure

Action 22: Proactive in managing change

Mission 9: Our mission is for information to be shared and collected effectively and for you to use it with ease (MTS Outcome 1, 2 & 4)

Action 23: Information exchange

Action 24: Building stronger public services

6. Assessment summary - Delivery Plan adequacy (proposals and timetable)

Chapter Three of the LIP3 Guidance outlines the requirements for the delivery of the schemes that the boroughs wish to deliver. The requirements specify that the borough outlines a programme of long term interventions up to the year 2041, a three year outline programme of works which they wish to develop and deliver, and a more detailed annual programme of works. The boroughs also have to provide a risk register and its proposed measures to mitigate them.

The LIP3 submission has been assessed against these requirements and it has been shown that the LIP satisfies them.

The borough has ambitions to deliver a number of large projects up to 2021/22. Two examples include:

- Long Lane- A scheme to address rat running in response to changes in the wider network and to improve connections to Guy's Hospital.
- Lordship Lane- A scheme to implement speed reduction measures following the review of a borough wide 20mph restriction.

The three year programme conforms to the requirements and supports the aspirations as outlined in the MTS.

Turning to the detailed annual programme, the borough intends to promote a range of projects that support the MTS. The borough intends to invest £2040k per year over the next three years, including physical measures to reduce road traffic accidents that supports the Mayor's Vision Zero objective. Two of the schemes the borough intends to deliver in the first year of LIP3 include:

- The Southwark Cycle Spine Route (£200k) which will provide greater cycle connectivity for cyclists in the borough.
- The Kerbside Smarter Street programme (£150k), which proposes to develop a number of ideas detailed in the borough's Kerbside strategy to better utilise this space.

In addition the borough intends to invest in complementary measures to promote behavioural change and accident reduction. These include initiatives such as road safety education and the development of a toolkit to promote walking and cycling to school.

The borough will promote modal shift away from the dominance of the motor car by promoting the following walking and cycle schemes ;

- Deliver Walking Network (£1100k over the next three years) - A sensory audit of streets with residents and various groups with varying physical requirements.
- Calm Streets (£150k over the next three years) -The creation of 'calm' streets to improve the environment for walking by identifying street clutter and simpler highway designs.

Also include info on any special project e.g. Liveable Neighbourhood or interesting initiative that you can see from their LIP

In conclusion, the borough's delivery plan supports the Mayor's aspirations as outlined in the MTS