

## **Lewisham Cyclists (local borough group of the London Cycling Campaign) response to Lewisham Local Plan**

<https://lewishamlocalplan.commonplace.is/>

*10 April 2021*

### **About Lewisham Cyclists**

Lewisham Cyclists (LC) are the local borough group of the London Cycling Campaign (LCC) with more than 2500 supporters of whom over 700 are fully paid-up members of LCC. We speak up on behalf of everyone who cycles or wants to cycle in the London Borough of Lewisham and its adjacent local parks; and we speak up for a greener, healthier, happier and better-connected capital.

### **General comments on the plan:**

Lewisham Cyclists welcome the opportunity to comment on the Lewisham Local plan. The focus of our response is around the Transport and Connectivity section of the plan, along with some specific comments regarding certain sites throughout the borough. We would also [highlight our current campaigning objectives](#) which align with a number of the proposals in the plan and would urge the council to integrate these into the local plan. Our comments about the overall plan can be found below, along with specific detailed comments on a number of individual sites in the Appendix provided. We do have a number of comments and concerns as detailed below:

### **Specific points about the overall plan**

- We believe some of the wording in the plan should be revised to bring it in line with existing policies from City Hall, where walking and cycling should be “enabled” as opposed to “encouraged”. Lewisham council has been [encouraging and promoting cycling for more than a decade](#), yet still has one of the lowest mode shares for cycling amongst all inner London boroughs, and [the worst Healthy Streets Score of any Inner London borough](#). The key missing element to date has been dedicated infrastructure, creating a fully integrated cycle network which meets London Cycle Design Standards and enables all residents in the borough to choose cycling as a viable mode of transport.
- We fully support the Council’s visionary aims of becoming carbon neutral by 2030, and for 80% of all trips to be made by walking, cycling or public transport by 2041 (London Plan Policy T1). However, it should be noted that the Healthy Streets low scores attributed to the lack of safe cycle tracks, the amount of road space not managed under CPZ, and the low participation figures of cycling, the damage to health due to pollution hotspots, reveal that time to effect lasting and sustainable change is very limited.
- We also note the outline strategic cycle network (figure 12.4) doesn’t use current nomenclature for cycleways, instead mentioning the now defunct quietways and cycle superhighways. This figure also shows incorrect routing for the A21 Lewisham

Spine which should follow the A21 and A20 as far as Jerrard Street before heading North up Brookmill road. This should be amended along with the terminology used to comply with the [Transport for London Cycling Action Plan](#). Whilst we support the aims of the strategic cycle network mentioned, we would expect this network to now be built to a standard which follows [London Cycle Design Standards](#). It should be noted that Lewisham council has yet to build any protected cycle track of considerable length within the last 5 years. The protected cycle track on Edward street in Deptford is to our knowledge, the only protected space (on a road) in the entire Borough that meets current design standards and was provided as part of Quietway 1 funded through TfL 5 years ago. It is approximately 250m. We would urge the planning department in the council to work more closely with highways in addressing a number of issues throughout the borough which have severed communities for decades and created pinch points, all of which should be addressed in any strategic planning documents for development on a number of adjacent sites. We provide some examples of this further below, although not an exhaustive list. Lewisham Cyclists would urge the council to update the existing borough cycle strategy and transport strategy to meet updated guidance and design principles as detailed in [Transport for London's Cycling Action Plan](#).

- We also support Policy TR3 and the aim of providing Health Neighbourhoods (HN). Again, there is a significant gap between what has been provided so far (1) and the need which we estimate to be over 100. Similarly, very few modal traffic filters have been installed in the Borough. Pre-pandemic it was one (Prince Street, Deptford) which represents the total number of filters (bollards/planters) installed in the last quarter century. During the first phase of the pandemic other emergency filters were installed but half have since been removed or in abeyance. We believe the council needs to show more political will and coherent commitment in delivering on its own strategy.
- Although the plan states (page 457) that developers will be expected to submit details of how their proposals will facilitate walking and cycling to and from their site(s), with a Healthy Streets approach, we consider this too discretionary to have a significant impact. In our experience developers simply focus on cycle parking facilities, rather than investing in improved connectivity to and from the site to other destinations. Therefore the plan should stipulate that adopting the Healthy streets approach will be a condition of planning with all new developments required to demonstrate an improvement in the healthy streets score for adjacent streets to development sites. Our view is the Council should take the lead in stipulating strategic active travel corridors, which the site specific developer would be required to link up with. We are hopeful this will happen with the A21 Healthy Streets Corridor (Lewisham Spine) as envisioned. Unless a strategic cycle and active travel network is specifically pursued by the Council, as previously mentioned in the Council's own Transport Strategy, it is unlikely that developers will single handedly secure that crucial piece of sustainable travel infrastructure. In terms of investment, S106/CIL contributions should be ring fenced for enabling active travel to/from areas of development.
- On page 460 - last mile delivery we support this although we'd like to see the Council supporting e-cargo bike delivery companies as well as encouraging mutual storage and warehousing facilities at strategic points such as to provide delivery hubs for both Lewisham and Catford Town Centres.

- Bakerloo Line Extension - we're supportive of the extension ([as mentioned at consultation](#)) but consider cycle hubs are needed at strategic interchanges, especially New Cross, Lewisham, and Catford. Secure cycle parking is essential to promote onward public transport access and avoid the current car park dominated areas outside stations. We believe this should be provided as part of S106 agreements for all development within 100 metres of a station entrance.
- Car parking, legal pavement parking should be banned for all new development, with controlled parking zones for existing residents implemented as conditions of any planning agreements.
- Lewisham's Cycling Strategy (2017) itself informs much of the Transport and Connectivity section, which is welcomed. However, it is important to note that the last known review of this (<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=136&MId=5566>) reflected the significant challenge of targets already set , most of which were under-achieved at this review, and remain so eighteen months later. Ambitious targets of doubling the number of cycling journeys; increasing the proportion of people cycling to work to 10%; halving casualty rates of cyclists; and increasing the proportion of children cycling to school to 50% remain, and the gap towards closing in on those laudable metrics is as challenging as ever. Out of the 21 "quick win" cycle contra-flows identified, only 3 have been implemented in the period since the review.
- More positively Lewisham has made progress with school streets but there are many more significant and structural interventions required before Lewisham becomes an active travel exemplar. Securing these will require a more joined-up strategic approach where the Borough can apply an organisation wide culture of thinking beyond the car, amongst all its officers and members.
- Despite our obvious reservations on the scale of the challenge ahead, we remain committed to supporting Lewisham where there is commitment to real and lasting change. Anecdotally the number of people cycling, and crucially the number of people who would cycle if it was safe, have grown during the pandemic. Despite the hardships and tragedies of the past year, most of us have significantly changed our behaviour in our daily lives. We want a new normal which enables more people to walk and cycle in a safe and pleasant surrounding that is good for health, and people's social and mental well being. It will also make them happier and [benefit the local economy](#) and cultural life of the Borough.

## General points about infrastructure schemes:

- The Mayor's Streetspace Plan and Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes must be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all "critical issues" eliminated. Above 2,000 Passenger Car Unit (PCUs) motor vehicle movements per day, or 20mph motor traffic speeds, cycling should be physically separated from motor traffic.

## **Appendix**

### **Specific points about transport within the designated character areas:**

#### **Central Area Plan**

- Page 50 point 4 and also point 14.6 in the main document refer to “transform the A21 into a Healthy Street”. This is also mentioned in the spatial objectives (page 478). We would suggest the wording of this is altered to “adopt the healthy streets approach along the A21 corridor” and encourage the planning team to [follow TfL guidance on this](#) which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.
- Page 50 point 8 (page 478, spatial objectives) refers to “Deliver a connected network of high quality walking and cycle routes that link these spaces”. Lewisham Cyclists welcome this, but would highlight this would also need to follow [London Cycle Design Standards](#) and contributions from developers would need to take this into account in order to avoid a repeat of what happened at the Catford Green Development and bridge to Doggett Road.
- Page 51 , the map shown has a number of errors, including incorrect alignment for the A21 Healthy Streets corridor. This should be amended.

#### **Central Area Site Allocations**

- **Lewisham Gateway**; the current site allocation opportunities (14.20) fails to take into account that the junction does not meet current London Cycle Design Standards, and scores poorly on Healthy Streets scoring matrix. Any future development should note in the development requirements (14.21) should involve the junction being designed to meet [London Cycle Design Standards](#) and also follow the council’s own transport strategy, detailing a strategic cycle route along the A21 and connecting to Brookmill Road via the A20. The junction should also be redesigned to enable more people to walk and cycle from Lewisham High Street to access new development, a major transport interchange and existing business. Lewisham Cyclists want this to be listed explicitly in the Development guidelines.
- **Endgate street**; This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the Development requirements as part of the public realm strategy.
- **Conington Road & Land at Conington Road and Tesco**; Both sites need to provide enough space on Silk Mills path for high quality public

realm to link the proposed new public square. Building lines need to take this into account in the development guidance.

- **Molesworth Street Car Park;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Lewisham Retail Park, Loampit Vale & Land at Loampit Vale/Thurston Road (CarpetRight);** Both sites need to recognise the council transport strategy to deliver the Healthy Streets corridor between Lewisham and Deptford, (either along Jerrard Street once converted to two operation or along Thurston Road) in making sure any development does not result in a reduction in existing footway, cycle lane or carriageway space. This should be detailed in the development requirements as part of the public realm strategy for this site, station redevelopment and connectivity to Lewisham Town Centre.
- **PLACE/Ladywell (Former Ladywell Leisure Centre);** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Driving Test Centre, Nightingale Grove;** This site needs to recognise the council transport strategy to deliver Healthy Neighbourhoods in order to enable more people to choose to walk and/or cycle. Any development on site should not result in a reduction in existing footway or carriageway space and should seek to reduce overall motor traffic volumes in the area. This should be detailed in the development requirements as part of the public realm strategy and appropriate CIL contributions should be made by developers to facilitate this.
- **Ravensbourne Retail Park;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Plassy Road Island;** This site needs to recognise the council transport strategy to deliver Healthy Neighbourhoods in order to enable more people to choose to walk and/or cycle. Any development on site should not result in a reduction in existing footway or carriageway space and should seek to reduce overall motor traffic volumes in the area and enable people to choose to walk and cycle between Sangley Road, the Corbett Estate and Catford Town Centre. This should be detailed in the development requirements as part of the public realm strategy and appropriate CIL contributions should be made by developers to facilitate this.

- **Laurence House and Civic Centre;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor and also East West links along A205 Catford Road in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Wickes and Halfords, Catford Road;** This site needs to recognise the council transport strategy to deliver the Greenwich to Kent House Cycleway (along the Waterlink way), detailed in the the [Transport for London Cycling Action Plan](#) , in making sure any development does not result in a reduction in existing footway or shared path space. This should be detailed in the development requirements as part of the public realm strategy for this site, making clear that walking and cycling routes should be clear, direct and wide enough to meet future demands. We refer the council to our [Consultation response to the Catford Town Centre Framework](#).
- **Land at Rushey Green and Bradgate Road (Aldi);** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This site also needs to recognise the council transport strategy to deliver Healthy Neighbourhoods in order to enable more people to choose to walk and/or cycle. This should be detailed in the development requirements as part of the public realm strategy.
- **Land at Randlesdown Road and Bromley Road;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.

### **North Area Plan**

- Page 561 Key Spatial Objective 8 in the main document refers to “transform the A2 into a Healthy Street”. We would suggest the wording of this is altered to “adopt the healthy streets approach along the A2 corridor” and encourage the planning team to [follow TfL guidance on this](#) which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.
- LNA2 New Cross Road / A2 corridor Section A; as per point above. In addition, Section D includes “Interventions to support a rebalancing of New Cross Road to prioritise movement by walking and cycling, including by widening pavements and reducing pinch-points”. Lewisham Cyclists expect any public realm scheme involving the

removal of the Amersham Vale Gyratory to provide a high quality cycle route to facilitate the future cycling route 11 as per the [Transport for London Cycling Action Plan](#) from Deptford along New Cross Road connecting to Old Kent Road on the borough boundary.

### **North Area Site allocations**

- **Evelyn Court at Surrey Canal Road Strategic Industrial Location;** This site needs to recognise the council transport strategy to deliver Cycleway 4 in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Strategic Industrial Land (SIL) at Surrey Canal Road and Trundleys Road;** This site needs to recognise the council transport strategy to upgrade Cycleway 10 (previously Quietway 1) in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Strategic Industrial Land (SIL) at Apollo Business Centre;** This site needs to recognise the council transport strategy to upgrade Cycleway 10 in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.
- **Surrey Canal Triangle Mixed-use Employment Location;** This site needs to recognise the council transport strategy to deliver Cycleway 10 in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy. As part of the Surrey Canal Triangle Masterplan, development requirements must also recognise the essential need for upgrade to the Connect 2 path running from Bridgehouse Meadows to Oldfield Grove and improve connectivity between Bolina Road and Cycleway 10, all in line with [London Cycle Design Standards](#). CIL and S106 contributions from developers would need to take this into account.
- **Former Hatcham Works, New Cross Road & Goodwood Road and New Cross Road;** Both sites need to recognise and acknowledge the future cycling route 11 as per the [Transport for London Cycling Action Plan](#) from Deptford along New Cross Road connecting to Old Kent Road on the borough boundary in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy. Plans for a “new walking and cycle access through the site from Goodwood Road. This must include a clearly articulated east-west route within the site, also enabling a link from Hatcham Park Road to Batavia Road via a bridge over the railway” should require adequate CIL and S106 contributions from developers as a condition of planning with any bridge design meeting the



Department for Transport [Local Transport Note 1/20](#) and [London Cycle Design Standards](#).

- **Land north of Reginald Road and south of Frankham Street (former Tidemill School);** In addition to section 15.78, the Development Requirements need to explicitly acknowledge the Council's own manifesto commitment to providing protected cycle lanes along Deptford Church Street, adjacent to this site as part of the North South Corridors it describes. This route is of strategic importance and has been identified in the Council's own Transport Strategy.
- **Sun Wharf Mixed-use Employment Location;** The development requirements fail to recognise the council transport strategy to deliver Cycleway 10 (Quietway 1) which runs over Ha'penny hatch bridge as well as Cycleway 35 (Greenwich to Kent House, running along Creekside). The development requirements should include making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy and should follow [London Cycle Design Standards](#).
- **Lower Creekside Locally Significant Industrial Site;** Lewisham Cyclists believe public realm improvements at this location should link in to providing better interconnectivity with Deptford high street, enabling active travel by reducing vehicular dominance and providing the mentioned green corridor. This should be stated in the Development Guidelines.

## East Area Plan

- Page 635 Key Spatial Objective 6 in the main document refers to “transform the South Circular (A205, Baring Road) and Lee High Road (A20) into a Healthy Street”. We would suggest the wording of this is altered to “adopt the healthy streets approach along the A205, Baring road and A20 corridor” and encourage the planning team to [follow TfL guidance on this](#) which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.
- LEA1 East Area place principles; In order for the council to meet Policy TR3 in the East area, LEA1 sections D, G and K need to state the requirement for public realm to be provided with the Healthy Street approach adopted throughout the corridor from Blackheath Village, via Lee Road, through Lee Green junction, along Burnt Ash Road and Baring Road upto and including Grove Park town centre.

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## East Area Site allocations

- **Leigate Shopping Centre & Sainsbury’s Lee Green;** In order for the council to meet policy TR3 in the East area, Development requirements (16.26) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running north-south along Burnt Ash Road as integral to providing access to high quality public realm and adopting the Healthy Streets approach.
- **Land at Lee High Road and Lee Road;** In order for the council to meet policy TR3 in the East area, Development requirements (16.34) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running East West along A20 Lee High Road and north-south along Lee Road as integral to providing access to high quality public realm and adopting the Healthy Streets approach.
- **Sainsbury Local and West of Grove Park Station;** In order for the council to meet policy TR3 in the East area, Development requirements (16.51) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running north-south along Baring Road as integral to providing access to high quality public realm and adopting the Healthy Streets approach.

## South Area Plan

- Page 676 Key Spatial Objective 6 in the main document refers to “Transform the Ringway corridor (Southend Lane and Whitefoot Lane) and the A21 corridor (Bromley Road) into ‘healthy streets’”. We would suggest the wording of this is altered to “adopt the healthy streets approach along the Ringway corridor (Southend Lane and Whitefoot Lane) and the A21 corridor (Bromley Road)” and encourage the planning team to [follow TfL guidance on this](#) which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.
- Lewisham Cyclists also believe Downham way should also provide additional protected cycle lanes to connect the Downham Estate, and area with lower PTAL, to both Local Centres in Grove Park as well as A21 Bromley Road and Beckenham Place Park. This should be included in LSA1 sections G and I.
- Figure 17.2, the map shown has a number of errors, including missing alignment for the Ringway corridor. This should be amended.

## South Area Site allocations

- **Former Bell Green Gas Holders & Bell Green Retail Park;** In order for the council to meet policy TR3 in the South area, Development requirements (17.19 & 17.22) should explicitly take into account plans for strategic cycle routes identified in the Council Transport Strategy running East-West through Bell Green Gyratory as integral to adopting the Healthy Streets approach as part of the public realm strategy and should follow [London Cycle Design Standards](#).
- **Sainsbury’s Bell Green;** In order for the council to meet policy TR3 in the South area, Development requirements (17.26) should explicitly take into account plans for strategic cycle routes identified in the Council Transport Strategy running East-West through Bell Green Gyratory as integral to adopting the Healthy Streets approach as part of the public realm strategy and should follow [London Cycle Design Standards](#).
- **Worsley Bridge Road Locally Significant Industrial Site;** The development requirements fail to recognise the council transport strategy to deliver Cycleways running from Lower Sydenham to Bromley. The development requirements should include making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy and should follow [London Cycle Design Standards](#).

## **West Area Plan**

- Page 735 Key Spatial Objective 8 in the main document refers to “Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) into ‘healthy streets’” . We would suggest the wording of this is altered to “adopt the healthy streets approach along the South Circular (A205) and Brockley Rise / Brockley Road (B218) corridor” and encourage the planning team to [follow TfL guidance on this](#) which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.