

Appendix B: All responses received from emails redacted

Statutory consultation from 22 September 2022 to 13 October 2022

	Reasons of Objections	Officer Response
1.	<p>I own a business on Bellenden rd between Choumert Rd and Chadwick rd and putting double yellow lines will have a huge negative impact on our livelihood. We can't solely rely on passing trade on foot as we have customers coming from all over south east London so where are they going to park? They can't park all the way on Danby street especially in winter and knowing my customers they will not pay for parking either they will just go somewhere else or start getting delivery. Companies like deliveroo and Uber take 35% plus vat so once you have deducted their fees and after taking out costs you aren't left with much profit. There will be no parking spaces left due to the high demand from the other businesses past choumert rd. I would really like you to consider putting a 20 minute free parking spot or keep a space for a single yellow line just for our side of the street so customers will be able to get out and pick up their food and leave without getting a fine. We have a book shop, estate agents, chemist, fish and chip shop, hair dressers, Chinese shop, an organic shop and a new Pilates studio on our side that will all benefit from it especially if you allow one space during the daytime too. This will have a very positive impact on our lunchtime trade as the footfall during the day is low. There are elderly and disabled residents on the street that need a space to get out of taxis or family members cars dropping them off. We've been here for 15 years and this will destroy everything we've worked so hard to build up. I really hope you can reconsider and think about us and our small businesses that have already suffered so much with the pandemic and now rising costs and energy bills. We have families to feed and this will potentially put us out of business</p>	<p>We propose converting single yellow lines to double yellow lines in order to ease the traffic flow on this section of Bellenden Road.</p> <p>There are two 30mins short stay bays on the opposite side of the bus stop near the junction of Bellenden Road with Chadwick Road. These bays were created for people who want to pop into the shops nearby. Single yellow lines are still in place on Chadwick Road. If visitors/ your customers would like to park on single yellow line, they can only park outside the restrictions hours (Mon – Sat 8:30 – 18:30) on Chadwick Road. In addition, they can also park in the shared bays on Choumert Road.</p> <p>With the current layout, it will not be possible to provide more short stay bays on this section due to the safety reasons. Council policy is to prioritise walking and cycling to encourage sustainable travel within the borough where possible.</p> <p>The loading restrictions will be reduced between 8:00am – 9:00am and 4pm – 6:30pm. Vehicles can load/ unload goods on double yellow lines for max 40 minutes outside of the restricted period.</p>
2.	<p>The junction of bellenden and maxted is dangerous and toxic at rush hour. Can this be added to the road closure scheme, particularly the</p>	<p>This request will be logged and will be investigated if funding becomes available in the future.</p>

	stretch of maxted between bellenden and sandison street. Or at least made 1 way to divert traffic	
3.	Parking on this section of the road makes it difficult for two way traffic to pass . There are frequent blockages making it dangerous for, cyclists, cars and traffic to pass. If parking is needed it would be helpful if it was restricted to one side of the road.	No waiting and loading restrictions would deter any parking or waiting on this section of the road to ease the traffic flow. Certain parking bays on this section will be retained in order to facilitate the business needs.
4.	<p>Please find enclosed an objection to the statutory orders and scheme. I am a local resident that walks and cycles along here most days and have found active travel conditions already degraded by previous spine packages.</p> <p>I look forward to receiving confirmation that this scheme will be rethought at your earliest convenience, alternatively a copy of the report to the cabinet member for streets regarding objections before the start of the decision making date.</p> <p>Southwark Spine package 4: objection</p> <p>This is an objection to the orders to the 'TMO2223-018_Spine 4 Bellenden' scheme. As set out below, the wording of order is legally flawed for multiple reasons, so it would need to be readvertised, were Southwark to desire to take the scheme further.</p> <p>Though the conversion of Single Yellow Lines to Double Yellow Lines is supported, the widening of car parking bays to SUV widths is strongly opposed and the opportunity should be taken to reduce car parking bays to deliver modal shift. While the introduction of loading restrictions is supported, these should be 7-10 not 7.30-9am, and 3-7 not to 3-6.30pm to cover the peak periods. It is assumed these times refer to weekdays only, for the weekend, 10-4 restrictions should be introduced to cover the different peak traffic hours. Such changes could be readvertised and introduced quickly, while the rest of the scheme budget is repurposed to trial a Low Traffic Neighbourhood for the Bellenden area, building on the recent Camberwell traffic study.</p> <p>Grounds for objection are set out below in the eight sections below.</p>	<p>Widening the parking bays in this particular location is unlikely to impact on choice of vehicle.. It's to allow the carriageway to have 3.1m for each lane so that cyclists can comfortably take primary position in both directions.</p> <p>In order to minimise the impact on businesses, the times of the loading restrictions cannot be extended. It will be reduced due to the objections received from the businesses.</p>

Preliminary procedural issues

The orders advertised rely on a “map-based schedule” defined as “the map attached to and to be read in conjunction with this Order”, yet no such map is attached to the order that has been advertised. The statement of reasons shows an initial scheme drawing but it is unclear whether that corresponds to the scheme that the order relates to or not.

The explanatory note includes a range of errors such as suggesting the scheme is on a borough boundary (“pursuant to arrangements made with the Council of the London Borough of Lewisham”) and fails to include the days of the week that the loading restrictions would operate, just the times. This makes it impossible for those reading the order to be able to give informed comment, such as for there to be a lawful consultation. In addition, or in the alternative, the consultation fails to comply with the requirements of the Road Traffic Regulation Act 1984 and regulations made pursuant to that Act.

The combination of these failings means that a new order will need to be advertised for there to have been a lawful statutory consultation.

Failure to reduce road danger

The scheme proposes to make the streets safer through traffic calming. Yet road danger in this area is due to the volume of motor traffic, not the speed. According to Southwark’s own traffic survey in 2019, the average speed northbound on Bellenden Road between Chadwick and Choumert Road was 16.8mph and the 85th percentile speed was 20.4mph, while southbound the average was 14.2, with the 85th percentile 18mph. Additional traffic calming is not going to

Preliminary procedural issues

As you will have seen in the recent email sent by our Traffic Orders Team. The scheme was under consultation when your email was sent, and the Traffic Management Order pertaining to the proposals was not yet Made enforceable. There is not a map-based schedule attached to the draft TMO because the changes have not yet been Made.

In regard to the explanatory note of public notice containing a couple of errors. We will amend the TMO (1) to address the days of the week along with the operating times that the loading restrictions would operate, and (2) to remove ‘the arrangement made with the Council of the London Borough of Lewisham’. The amended TMO and public notice will be re-advertised and subject to the same 21 day statutory period. Note that any objections you have submitted that have not been resolved in this response will be taken forward and determined along with any representations received during the new statutory period.

Failure to reduce road danger

The main aim of this scheme is to improve walking and cycling facilities on Bellenden Road. We’re proposing footway widening, raising the existing zebra crossing, new cycle stands and junction build-outs to provide more space for walking and cycling. In order to achieve these aims, it’s important that vehicles do not exceed 20mph. Speeds are low in the Bellenden Road area and it’s intended that the new measures proposed will ensure this remains the case.

We are proposing a junction buildout (1) to slow down vehicle speeds so that drivers must give way to oncoming traffic, and (2) to provide more space for pedestrians. This scheme was reviewed by an independent Road Safety Auditor to assess the road safety of the scheme in order to ensure our design is safe to be built. Traffic data and collision data were also submitted to the

have a statistically significant impact, given average speeds are already well below the speed limit.

The wider context is that the reduction in collisions in Southwark has flat-lined since 2014, with those involving cycling increasing. This is very significantly off the trend required for Southwark to meet its ambitious targets to reduce Killed and Seriously Injured collisions. New evidence ([The Impact of Introducing Low Traffic Neighbourhoods on Road Traffic Injuries](#), 2021) makes very clear the importance of Low Traffic Neighbourhoods, which reduce collisions for people walking, cycling and driving by a factor of 3 to 4, with no noticeable change to safety on boundary roads. It is simply not conceivable how Southwark could achieve its safety targets without Low Traffic Neighbourhoods across the borough.

Far from improving safety for people cycling, this scheme would actively make it worse by squeezing cyclists into oncoming heavy traffic. It is unclear whether the scheme still includes the proposed chicane that was strongly criticised in the independent road safety audit as well as in consultation responses.

In the circumstances, approval and construction of this scheme would clearly breach Southwark's statutory duties pursuant to section 39 of the Road Traffic Act 1988.

Failure to consider minimum pavement widths

Despite being raised in consultation response, the report fails to consider at all national or TfL guidance on pavement widths. The proposed layouts are so poorly designed that they would prevent widening of some pavements on Bellenden Road that at 1.6m wide are below minimum widths and discriminate against those with disabilities. In addition there are a number of obstructions that further reduce pavement width further below these minimum standards but that are not addressed at all by the scheme.

auditor for assessment. The plan will continue to be assessed before finalising the designs. It is planned that by introducing the measures, we will improve the walking and cycling experience, traffic speeds and reduce the no. of collisions on Bellenden Road. In addition, the scheme will also be monitored by conducting traffic surveys.

In regard to chicane, the existing on-street parking has already created this effect. We have reduced the likelihood of road safety issues by shortening the length of the bays based on the RSA comments. Therefore, it's clear that Southwark has been following statutory duties to pursuant to section 39 of the Road Traffic Act 1988 to ensure the scheme does not pose any road safety issues to members of the public, taking steps to monitor and controlling risks.

Failure to consider minimum pavement widths

Our design guides are for roads that we build today. Many historic roads and footways are narrower than the minimum in our design guides and it simply is not possible to demolish all the adjacent properties to create extra space for the desired highway widths. The minimum footway widths for disabled access is 1.5 metres, which is achieved in this design. Please refer to the Equal Pavement Pledge produced by Mayor of London.

One of the objectives of this scheme is to improve walking facilities. This scheme proposes to increase the width of the footway on one side of the existing road to three metres, this will support the large footfall in the area and allow space for vulnerable users and wheelchair access. The proposed raised table crossing also allows disabled users to cross easily.

According to [Pedestrian Comfort Guidance for London](#): “In other areas, low flow streets can be 2m wide if there is no street furniture. This total width is required for two users to pass comfortably and to meet DfT minimum standards.” Bellenden is a neighbourhood centre and, even before any growth in walking, not a low flow street. These failings raise both road safety and equalities issues.

Failure to consider Network Management Duty guidance

Contrary to section 16 of the Traffic Management Act 2004, the decision failed to consider let alone comply with statutory Network Management Duty Guidance, most recently updated by DfT in April 2022. This requires local authorities to make “continue to make significant changes to their road layouts to give more space to cyclists” (emphasis added) and that “[a]ny measures for cycling should be designed to meet the requirements set out in [Local transport note 1/20: cycle infrastructure design \(LTN 1/20\)](#)”. The scheme fails to comply with the guidance, which recommends physical separation or restricting access for driving through modal filters or pedestrian and cycle zones. The guidance is clear that “20mph limits alone will not be sufficient to meet the needs of active travel”. For the avoidance of doubt, although not explicit, it is clear from these publications that adding cycle logos and marginal adjustments with pavements, as the scheme proposes, will not either.

The report asserts that “[c]ar usage has been made less convenient and this will, over time, contribute to a decrease in car usage as it becomes a less convenient way to get around...If there continues to be a risk of high vehicle volumes on Bellenden Road, future improvements to the highway and public realm could assist with

Furthermore, this section of the road is inspected monthly to ensure the road condition is up to standard.

Failure to consider Network Management Duty guidance

As a Highway Authority, we have a responsibility to avoid, eliminate or reduce road congestion or other disruption to the movement of traffic on the road network and to secure the most efficient use of the road network which is stated in the section 16 of the Traffic Management Act 2004. The aim of this proposed scheme is to improve the walking and cycling facilities while resolving the congestion caused by heavy traffic in the area e.g. vehicles waiting or parking on the single yellow lines currently leads to congestion in the area. In addition, the current width of carriageway does not allow us to create segregated cycle lane while maintaining two-way traffic, plus suitable footway widths. It’s correct that 20mph limits alone will not be sufficient to meet the needs of active travel, therefore, we need to create and invest more on improving and providing walking and cycling facilities to encourage and remind people to use sustainable modes of transport.

Providing cycle logos on the carriageway is to remind road drivers to be aware of cyclists and they have the priority use on carriageway.

The scope of this scheme is to improve the walking and cycling facilities on Bellenden Road. A Low Traffic Neighbourhood (LTN) is out of scope.

identifying ways to reduce or prevent through traffic from entering Bellenden Road.”

The claim that a couple of traffic humps will reduce traffic is simply unarguable, even more so as the speed data referenced above shows the measures proposed will not change journey times, if anything the double yellow lines at this pinchpoint lead to more through rat-running. Furthermore, the scheme moves cycle parking so that it is further from most of the shops than the car parking, in other words making driving more convenient than cycling.

In addition the scheme fails to consider [TfL guidance on Low Traffic Neighbourhoods](#), which specifically identify Peckham, including these streets as having the highest potential and greatest need, given the high vehicle volumes, to become a Low Traffic Neighbourhood.

Failure to consider funding challenges

The report simply fails to acknowledge the pressure on funding, instead suggesting that there could be future improvements. TfL’s funding for active travel has been severely reduced, for 2022/23 down from £414 million to £80 million guaranteed, and this before the UK has entered into a major recession. The funds that remain must be used far more carefully and radically if existing targets are to be achieved, as there will simply not be funding to redo schemes a few years later. These cuts come alongside further pressure on direct funding for local government, as [Southwark’s leader has recently tweeted](#).

Were the area to become a Low Traffic Neighbourhood, and there to be any funding left to do this, the proposed pavement changes would need to be changed again, wasting the funding.

Failure to consider funding challenges

The funding for this scheme will not be impacted by funding cuts from TfL. However, the funding for this scheme will not be allocated to an LTN as it’s out of the scope. If an LTN is considered in the future, these walking and cycling facilities will complement it. Therefore, it’s not a waste of money.

No alignment to net zero 2050, let alone 2030

Experts agree that motor traffic reduction is urgently required to put the UK on a pathway to net zero for 2050, in particular by securing the 68% reduction in emissions by 2030 that the UK committed to for the COP26 summit. Surface transport emissions from tailpipes have barely changed since 1990 and now are the largest contributor to the climate emergency, even before the wider impacts of manufacturing ever larger cars and maintaining roads for them is considered.

According to a new report from the House of Lords ([Government must support behaviour change to meet climate targets](#)) we need to urgently reduce driving, with experts suggesting a 20% reduction national wide by 2030, clarified as *“an absolute reduction from today’s level, so it is not against an increasing baseline. That is the minimum that a whole variety of models, done in a variety of different ways, at different geographical scales across the country, have come up against. As much as a 50 per cent reduction is found in some models at some geographical scales.”*

As an inner London area with excellent public transport and dense development enabling shorter journeys, there is clearly far greater potential and need for Southwark to adopt traffic reduction at the highest levels of this range, to play its role for the UK to achieve net zero by 2050. The Mayor of London has recently consulted on reducing motor traffic by 27% by 2030. Nonetheless Southwark’s own target of net zero by 2030 is very significantly more ambitious than net zero by 2050, not least because there is minimal if any scope to net off emissions by 2030. Even more transport radical measures would be essential for this target to be credible.

No alignment to net zero 2050, let alone 2030

As mentioned, the objectives of this scheme are to improve walking and cycling facilities by widening the footways, introducing junction buildouts, upgrading zebra crossings and providing more cycle stands. Investing in more facilities to encourage sustainable travel is the focus under this scheme.

We are proposing to widen the parking bay to 2 metres as it allows carriageway to have two 3.1m lanes, so that cyclists can comfortably take primary position in both directions. Also, it’s based on our design guidance to allow 2 metres width for parking bays.

The report notes that “[k]ey aims of the council’s Climate Change Strategy include to ‘reduce car journeys to a minimum by 2030’ and to ‘be a borough where the walking and cycling becomes the default way to get around’” then asserts that “[t]hese measures strongly support that ambition by creating an area where walking and cycling are prioritised over motor vehicle usage.”

As set above, this is simply not arguable, whether in terms of the scheme failing to prioritise active travel substantively or even meeting minimum standards of DfT or TfL guidance. Rather than reducing motor traffic by including any form of traffic filtering, the scheme would lock in hazardous and hostile conditions, in some respects making them even worse.

Moreover the proposals would widen parking bays. This would facilitate the use of SUVs, which have been shown to increase danger to vulnerable road users and increase emissions, cancelling out the emissions savings from electric vehicles. Nothing could be more totemic about how flawed this scheme is and why it’s time to start again.

Design quality & conservation area

Despite public realm issues being raised in consultation responses, these have been completely ignored in the report. The changes to kerb line and street furniture would have a devastating impact on layout and setting of the world famous Anthony Gormley bollards that form a key element of the conservation area.

The wider design of the scheme is a decade behind other boroughs, for example rather than continuous pavements, ugly entry treatments are proposed, covered with lines, the graffiti of the traffic engineer. This is a world away from the high quality public realm that is being

Design quality & conservation area

According to Section 105Z of the Highways Act 1980, it states that Environmental Impact Assessment is required to be carried out only when the area of the completed works together with any area occupied during the period of construction or improvement by requisite apparatus, equipment, machinery, materials, plant, spoil heaps or other such facilities exceeds one hectare or if it, or any part of it, is situated in a sensitive area. This proposed scheme is neither situated in a sensitive area nor does it exceed one hectare.

<p>delivered on similar streets by other London boroughs, such as Orford Road in Waltham Forest.</p> <h2>Equalities impacts</h2> <p>Though the report upon which the scheme was approved promised an Equality Impact Assessment, no such document has been made public. The text relating to this is legally flawed, focusing only on direct discrimination, thereby ignoring the statutory duties to reduce inequality in the Equality Act 2010. By failing to provide the much needed step change in conditions for cycling, the scheme would fail to widen the demographics of people who cycle, a core principle of the 2015 Southwark Cycling Strategy. The scheme fails to address a range of inaccessible pavement features, as noted above, so fails to comply with statutory duties to make reasonable adjustments for people with disabilities.</p>	<h2>Equalities impacts</h2> <p>An Equalities Impact Assessment will be issued as part of an Appendices of the IDM report. The public consultation was open to all members of the public - age, disability, gender reassignment, ethnicity, pregnancy and maternity, religion or belief, sex, sexual orientation and marriage and civil partnership, which complies to the Equality Act 2010.</p> <p>Based on the result of the public consultation, analysis of the respondents with a disability showed that 80% agreed with the proposals. It should be noted that of the 25 respondents, three live within the consultation area, all of whom are in agreement with the scheme proposals. This further shows this scheme benefits those with disabilities</p>
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Statutory consultation from 27 October 2022 to Thurs 17 November 2022

1	Hello its the proposed double yellow lines on bellenden road i object to them. Thank you so much	No reason given for the objection
2	This road is on my route on the way back to home from.work. Bellenden Road is a great spot for an eco-friendly shopping where I tend to go 4-5 days a week. Ability to park on the road is a must for sustainability as it is more convenient for short stay/visits.	There are short stay parking between Choumert Road and Macted Road.
3	n/a	no further explanation received in response to the objection of the scheme
4	It will make life very difficult for local businesses to load/ unload	Local businesses can load / unload their goods in the designated loading bay on Chadwick Road. They can also load / unload their goods on Double Yellow Lines for a maximum of

		40 mins outside the restricted time between 8am – 9am and 4pm – 6:30pm.
5	It will adversely affect businesses and the residents as accessibility to the area will be limited.	The majority of residents in Southwark do not own a car, we are providing facilities for those walking, cycling and using public transport. There are still locations to park for those who need to use a car.
6	<p>I have lived and worked on Bellenden rd for 15 years serving customers and supporting local residents whenever I can. We already have restricted parking causing our lunchtime and daytime trade to be quiet so I rely on my customers driving home and stopping to pick up food. Double yellow lines will put an end to that. I have a family to feed and have had a very difficult few years with the pandemic and now the rise in costs so I need to know that I have the support of my existing customers that I've spent 15 years building up. Widening our pavements will not increase footfall to our shops. We need a parking bay dedicated to the shops between Chadwick rd and choumert rd as Danby street is too far and the existing parking spots will be taken up by the shops further down as it's already very limited anyway. Southwark council needs to come and talk to us and ask for suggestions as the majority of us are working when these meetings take place so the views in the meeting cannot be a fair representation of the street and is massively in favour of cyclists. I am all for reducing pollution but we cannot be forgotten when making these plans. we have built up a business and have supported our community and need help now. Please reconsider and add a bay or two for 20 minutes parking all day to help customers stop and collect food or prescriptions or help drop off or pick up local residents or use the other shops on our street.</p>	<p>There are two 30mins short stay bays on the opposite side of the bus stop near the junction of Bellenden Road with Chadwick Road. These bays were created for people who want to drop to the nearby shops. Single yellow lines are still in place on Chadwick Road. If visitors/ your customers would like to park on single yellow lines, they can only park outside the restrictions hours (Mon – Sat 8:30 – 18:30) on Chadwick Road. In addition, they can also park in shared bays in Choumert Road.</p> <p>With the current layout, it will not be possible to provide more short stay bays on this section due to safety reasons. Council policy is to prioritise walking and cycling to encourage sustainable travel within the borough.</p> <p>Council officers spoke to all businesses one-to-one during the design period.(Apologies if you were not around when we called-in.)</p> <p>We carried out a public consultation between 22 November 2021 and 17 December 2022. We received a total of 57 responses from local residents/businesses. 40 respondents from local residents/businesses agreed to change existing sections of single yellow lines to double yellow lines. We received a total of 341 responses during the consultation period, 208 respondents out of 341 agreed for the change. Please refer to the Appendix C Consultation Summary Report.</p>

7	We need to be able to park on this street, even if only temporarily to unload shopping or to drop of the children. I do not understand the need for double yellow restrictions being put on place other than to cause us residents hardship	Drivers are able to load/unload goods for maximum 40mins and pick up/drop off outside the restricted hours (Mon to Sun between 8am – 9am and 4pm – 6:30pm)
8	I visit the shops regularly and will have no where to park for visits. All the other parling is permit holders only so there will be no parking dor brief visits.	There are still parking bays available on nearby streets. For more details, please check on our parking webpage here: https://live-ylp-streets.azurewebsites.net/southwark
9	I own a business and also live on Bellenden rd and having double yellow lines in front of our shop will have a negative impact on our business. Widening the pavements will not attract customers to our shop as we have the bus stop right outside so the fumes come in. The footfall will not increase and it will only deter our customers that we've spent 15 years building up from stopping. Danby road is too far to stop and get a take away or a prescription or to pick up or drop off a local resident from their house. We need at least 20 minutes parking all day to help out businesses placed somewhere between choumert rd and Chadwick rd or our businesses will not survive especially as we're just getting over a pandemic and have increased costs. I've got 3 kids and the council need to support the small local businesses that are the backbone to the local community. I beg you to reconsider and look at other options to help us increase our trade rather than dedicating the street to cyclists who are just passing through.	There are two 30mins short stay bays on the opposite side of the bus stop near the junction of Bellenden Road with Chadwick Road. These bays were created for people who want to do a quick shops nearby. Single yellow lines are still in place on Chadwick Road. If visitors/ your customers would like to park on single yellow lines, they can only park outside the restricted hours (Mon – Sat 8:30 – 18:30) on Chadwick Road. In addition, they can also park in shared bays on Choumert Road. With the current layout, it will not be possible to provide more short stay bays on this section due to the safety reason. Council policy is to prioritise walking and cycling to encourage sustainable travel within the borough.
10	I use the shops and businesses on this road and will have no where to park	There are still parking bays available on the surrounding streets. Please check on our parking webpage for details: https://live-ylp-streets.azurewebsites.net/southwark
11	When we visit family and use the shops, it is difficult to park.	There are still parking bays available in the surrounding streets. Please check on our parking webpage for details: https://live-ylp-streets.azurewebsites.net/southwark
12	I want to complain about the double yellow lines and the damage it will do to the businesses on the street (just so cyclists can use the road as a route home) they are leaving us with no parking. This will make it very difficult for visitors to use the shops on the road.	There are still parking bays available for visitors to park in the adjacent streets. Please check on our parking webpage for details: https://live-ylp-streets.azurewebsites.net/southwark

13	This will make it very difficult to visit the shops and eatery's when meeting up with family.	There are still parking bays available in the adjacent streets. Please check on our parking webpage for details here: https://live-ylp-streets.azurewebsites.net/southwark
14	n/a	
15	No parking for local shops that were the backbone of the community during the pandemic and are already suffering with high costs There will be no parking for residents on that side of the street, adding pressure to other areas. The plans will bring more cars, noise and pollution to the end of the street closest to the school.	The current short stay parking bays between Choumert Road and Maxted Road will not be changed.
16	I visit this area often for the shops and restaurants and parking is already a problem. I'm 72 years old and cannot ride a bicycle and so me and my family rely on the single yellow lines to park our car. The council should be helping the businesses that kept going and helped support everyone during lockdown and additional parking restrictions caused by double yellow lines will do the opposite. I don't think the impact to these businesses were ever considered when the plans were being made. Please reconsider. Thank you	There are still parking bays available near the shops and restaurants on adjacent streets. Please check on our parking webpage for details: https://live-ylp-streets.azurewebsites.net/southwark
17	Disregards the needs of the elderly, disabled and less able bodied (and often isolated) members of our society. Damaging to local businesses in a time of economic uncertainty.	Improving walking and cycling facilities by introducing raised table crossings and widening the footway to allow pedestrians particularly people with disabilities, people pushing pushchairs and the elderly to cross easily and safely.
18	I am a visitor. The planned double yellow lines will affect the route on the way home and parking to use the shops will be a problem.	There are still parking bays available for visitors to park on adjacent streets. Please check on our parking webpage for details: https://live-ylp-streets.azurewebsites.net/southwark
19	We need a loading bay on the road and another space to park for 20 minutes. We should have two car spaces for these purposes. 20 minutes stop will allow people to Visit shops easily still and hopefully not affect businesses. Our businesses need deliveries throughout the day and close to our premises as boxes are heavy. This could potentially cause drivers issues and not deliver to our shops.	There are two 30mins short stay bays on the opposite side of the bus stop near the junction of Bellenden Road with Chadwick Road. Due to the safety reasons, it will not be possible to provide more short stay bays on Chadwick Road and Choumert Road.

	I propose two parking spaces for the above reasons.	No loading restrictions will be reduced to between 8:00am – 9:00am and 4:00pm – 6:30pm to allow businesses early morning deliveries.
20	<p>Southwark Spine package 4: objection</p> <p>This is an objection to the orders to the 'TMO2223-018_Spine 4 Bellenden v2' scheme, which fails to comply with DfT or TfL standards. The scheme is a decade behind good practice of other inner London boroughs: failing to deliver the radical change needed to meet the borough's climate or road safety targets, it would be a waste of ever scarcer funding.</p> <p>Overview</p> <p>With Southwark due to submit a 2023-2025 transport delivery plan to TfL by February and consult the public on a sustainable transport plan before then, this scheme should (other than the proposed waiting restrictions) be paused. All the more so as the previously implemented section of spine is due to be reviewed by then too.</p> <p>With respect to the data in TfL's Strategic Neighbourhood Analysis, it is very clear that objectively the Bellenden area needs to be the next Low Traffic Neighborhood (LTN) as it has:</p> <ul style="list-style-type: none"> ● the worst amount of rat-running in Southwark, now that Walworth Road has LTNs 	

next to it (p10)

- the narrowest pavements, less than 2.5m each side (p13)
 - the worst safety for walking & cycling on neighbourhood streets, now that LTNs delivered around Walworth Road and Meeting House Lane (p11)
 - the highest school density (p15) and highest proportion of older people (p18)
 - the largest section of bus route running on minor residential streets - P13 is the most affected route in Southwark, particularly slow here, getting stuck in the rat-running between ever larger parked cars (p19).
- In addition the scheme fails to consider TfL guidance on Low Traffic Neighbourhoods, which specifically identify Peckham, including these streets as having the highest potential and greatest need to become Low Traffic Neighbourhoods. And of course key for the spine to be a credible cycle route: the current proposals basically add cycle logos to a rat run nine years after Southwark promised the spine would be of such great quality that it would make the borough the best for cycling in London. While many other boroughs have step changed delivery, Southwark has instead delayed and watered down its ambitions.

Preliminary procedural issues

The orders advertised rely on a "map-based schedule" defined as "the map attached to and to be read in conjunction with this Order", yet no such map is attached to the order that has been advertised. The statement of reasons shows an initial scheme drawing but it is unclear

Preliminary procedural issues

The scheme was under consultation when your email was sent, and the Traffic Management Order pertaining to the proposals was not yet Made enforceable. There is not a map-based schedule attached to the draft TMO because the changes have not yet been Made.

whether that corresponds to the finalised scheme that the order relates to or not. For instance, whether the pedestrian guard rail will be removed and the proposal for a chicane abandoned. This makes it impossible for those reading the order to be able to give "informed comment", the test in administrative law for whether a consultation is lawful. Separate to this objection, I would like to make a formal complaint about the failure either to respond to the original objection that raised this issue, or provide any further information in the re-advertised order.

Waiting and loading restrictions

Though the conversion of Single Yellow Lines to Double Yellow Lines is supported, the widening of car parking bays to SUV widths is strongly opposed and the opportunity should be taken to reduce car parking bays to deliver modal shift, including creating on carriageway cycle parking bays in the middle of the shopping parade, where the greatest demand is, enabling pavement decluttering. The scheme should allocate one existing car parking bay for dockless modes, and another for disabled drivers. While the principle of the introduction of weekday peak hour loading restrictions is supported, these should be 7-10 not 7.30-9am, and 3-7 not to 3-6.30pm to cover the peak periods as well as school times.

Copying these loading restrictions for the weekend is unjustified and objected to. 7.30-9am weekend loading restrictions would prevent business loading when the streets are quiet, instead pushing loading to busier times. Peak flows during the weekend are different, so 10am to 4 or 5pm loading restrictions should be introduced for Saturday & Sunday instead.

Failure to reduce road danger

The scheme proposes to make the streets safer through traffic calming. Yet road danger in this area is due to the volume of motor traffic, not the speed. According to Southwark's own traffic survey in 2019, the average speed northbound on Bellenden Road between

Due to the high volume of responses in each scheme, we are not able to respond to the respondents individually. However, you can make a complaint via [Making a complaint - Southwark Council](#).

Waiting and loading restrictions

Widening the parking bays. allows the carriageway to have two 3.1m lanes, so that cyclists can comfortably take primary position in both directions.

In order to minimise the impact on businesses, time of loading restrictions cannot be extended. They will be reduced due to the objections received from the businesses.

Failure to reduce road danger

The main aim of this scheme is to improve the walking and cycling facilities on Bellenden Road. We're proposing footway widening, raising the existing zebra crossing, new cycle stands and junction build-outs to provide more space for walking and cycling. In order to achieve these, it's important that vehicles do not exceed 20mph. Speeds are low in the Bellenden Road area

Chadwick and Choumert Road was 16.8mph and the 85th percentile speed was 20.4mph, while southbound the average was 14.2, with the 85th percentile 18mph. Additional traffic calming is not going to have a statistically significant impact, given average speeds are already well below the speed limit.

The wider context is that the reduction in collisions in Southwark has flat-lined since 2014, with those involving cycling increasing. This is very significantly off the trend required for Southwark to meet its ambitious targets to reduce Killed and Seriously Injured collisions.

New evidence ([The Impact of Introducing Low Traffic Neighbourhoods on Road Traffic](#)

[Injuries](#), 2021) makes very clear the importance of Low Traffic Neighbourhoods, which reduce collisions for people walking, cycling and driving by a factor of 3 to 4, with no noticeable change to safety on boundary roads. It is simply not conceivable how Southwark could achieve its safety targets without Low Traffic Neighbourhoods across the borough.

2 Far from improving safety for people cycling, this scheme would actively make it worse by squeezing cyclists into oncoming heavy traffic. It is unclear whether the scheme still includes the proposed chicane that was strongly criticised in the independent road safety audit as well as in consultation responses.

In the circumstances, approval and construction of this scheme would clearly breach Southwark's statutory duties pursuant to section 39 of the Road Traffic Act 1988.

Failure to consider minimum pavement widths

Despite being raised in consultation response, the report fails to consider at all national or TfL guidance on pavement widths. The proposed layouts are so poorly designed that they would prevent widening of some pavements on Bellenden Road that at 1.6m wide are below minimum widths and discriminate against those with

and it's intended that the new measures proposed will ensure this remains the case.

We are proposing a junction buildout (1) to slow down the vehicles speed so that drivers aware of oncoming traffic and give way, and (2) to provide more space for pedestrians. This scheme was reviewed by an independent Road Safety Auditor to assess the road safety of the scheme in order to ensure our design is safe to be built. Traffic data and accident data were also submitted to the auditor for assessment. The plan will continue to be assessed before finalising the designs. It is planned that by introducing the measures, we will improve the walking and cycling experience, traffic speeds and reduce the no. of collisions on Bellenden Road. In addition, the scheme will also be monitored by conducting traffic surveys.

In regard to chicane, the existing on-street parking has already created this effect.. We have reduced the likelihood of road safety issues by shortening the length of the bays based on the RSA comments. Therefore, it's clear that Southwark has been following statutory duties to pursuant to section 39 of the Road Traffic Act 1988 to ensure the scheme does not pose any road safety issues to members of the public, taking steps to monitor and controlling risks.

Failure to consider minimum pavement widths

Our design guides are for roads that we build today. Many historic roads and footways are narrower than the minimum in our design guides and it simply is not possible to demolish all the adjacent properties to create extra space for the desired highway widths. The minimum footway widths for disabled access is 1.5 metres, which is achieved in this design. Please refer to the Equal Pavement Pledge produced by Mayor of London.

One of the objectives of this scheme is to improve walking facilities. This scheme proposes to increase the width of the

disabilities. In addition there are a number of obstructions that further reduce pavement width further below these minimum standards but that are not addressed at all by the scheme.

According to Pedestrian Comfort Guidance for London: "In other areas, low flow streets can be 2m wide if there is no street furniture. This total width is required for two users to pass comfortably and to meet DfT minimum standards." Bellenden is a neighbourhood centre and, even before any growth in walking, not a low flow street. There is obstructive furniture that the scheme fails to address. These failings raise both road safety and equalities issues.

Failure to consider Network Management Duty guidance

Contrary to section 16 of the Traffic Management Act 2004, the decision failed to consider let alone comply with statutory Network Management Duty Guidance, most recently updated by DfT in April 2022. This requires local authorities to make "continue to make significant changes to their road layouts to give more space to cyclists" (emphasis added) and that "[a]ny measures for cycling should be designed to meet the requirements set out in Local transport note 1/20: cycle infrastructure design (LTN 1/20)". The scheme fails to comply with the guidance, which recommends physical separation or restricting access for driving through modal filters or pedestrian and cycle zones. The guidance is clear that "20mph limits alone will not be sufficient to meet the needs of active travel". For the avoidance of doubt, although not explicit, it is clear from these publications that adding cycle logos and

footway on one side of the existing road to 3 metres, this will support the large footfall in the area and allow space for vulnerable users and wheelchair access. The proposed raised table crossing also allows disabled users to cross easily.

Furthermore, this section of the road is inspected monthly to ensure the road condition is up to standard.

Failure to consider Network Management Duty guidance

As a Highway Authority, we have a responsibility to avoid, eliminate or reduce road congestion or other disruption to the movement of traffic on the road network and to secure the most efficient use of the road network which is stated in the section 16 of the Traffic Management Act 2004. The aim of this proposed scheme is to improve the walking and cycling facilities while resolving the congestion caused by heavy traffic in the area e.g. vehicles waiting or parking on the single yellow lines currently leads to the congestion in the area. In addition, the current width of carriageway does not allow us to create segregated cycle lane while maintaining two-way traffic, plus suitable footway widths. It's correct that 20mph limits alone will not be sufficient to meet the needs of active travel, therefore, we need to create and invest more on improving and providing walking and cycling facilities to encourage and remind people to use sustainable modes of transport.

Providing cycle logos on the carriageway is to remind road drivers to be aware of cyclists and they have the priority use on carriageway.

do this, the proposed pavement changes would need to be changed again, wasting the funding. The £315k earmarked for this scheme would be enough to introduce an LTN with temporary materials, indeed that could with enforcement cameras be expected to be self-funding, if not generate new revenue.

No alignment to net zero 2050, let alone 2030

Experts agree that motor traffic reduction is urgently required to put the UK on a pathway to net zero for 2050, in particular by securing the 68% reduction in emissions by 2030 that the UK committed to for the COP26 summit. Surface transport emissions from tailpipes have barely changed since 1990 and now are the largest contributor to the climate emergency, even before the wider impacts of manufacturing ever larger cars and maintaining roads for them is considered. According to a new report from the House of Lords ([Government must support behaviour change to meet climate targets](#)) we need to urgently reduce driving, with experts suggesting a 20% reduction nation wide by 2030, clarified as “an absolute reduction from today’s level, so it is not against an increasing baseline. That is the minimum that a whole variety of models, done in a variety of different ways, at different geographical scales across the country, have come up against. As much as a 50 per cent reduction is found in some models at some geographical scales.” As an inner London area with excellent public transport and dense development enabling shorter journeys, there is clearly far greater potential and need for Southwark to adopt traffic reduction at the highest levels of this range, to play its role for the UK to achieve net zero by 2050. The Mayor’s Transport Strategy is set to be amended this month to include policy to reduce motor traffic Londonwide by 27% by

No alignment to net zero 2050, let alone 2030

As mentioned, the objective of this scheme is to improve walking and cycling facilities by widening the footways, introducing junction buildouts, upgrading zebra crossings and providing more cycle stands. Investing in more facilities to encourage sustainable travel is the focus under this scheme. We are proposing to widen the parking bay to 2 metres as it allows the carriageway to have two 3.1m lanes, so that cyclists can comfortably take primary position in both directions. Also, it’s based on our design guidance to allow 2 metres width for parking bays.

2030. Nonetheless Southwark's own target of net zero by 2030 is very significantly more ambitious than net zero by 2050, not least because there is minimal if any scope to net off emissions by 2030. Even more transport radical measures would be essential for this target to be credible.

4 The report notes that "[k]ey aims of the council's Climate Change Strategy include to 'reduce car journeys to a minimum by 2030' and to 'be a borough where the walking and cycling becomes the default way to get around'" then asserts that "[t]hese measures strongly support that ambition by creating an area where walking and cycling are prioritised over motor vehicle usage."

As set above, this is simply not arguable, whether in terms of the scheme failing to prioritise active travel or even meeting DfT or TfL minimum standards. Rather than reducing motor traffic by including any form of traffic filtering, the scheme would lock in hazardous and hostile conditions, in some respects making them even worse. Moreover the proposals would widen parking bays. This would facilitate the use of SUVs, which have been shown to increase danger to vulnerable road users and increase emissions, cancelling out the emissions savings from electric vehicles. Nothing could be more totemic about how flawed this scheme is and why it's time to start again.

Design quality & conservation area

Despite public realm issues being raised in consultation responses, these have been completely ignored in the report. The changes to kerb line and street furniture would have a devastating impact on layout and setting of the world famous Anthony Gormley bollards that form a key element of the conservation area. The wider design of the scheme is a decade behind other boroughs, for example rather than continuous pavements, ugly entry treatments are proposed, covered with lines, the graffiti of the traffic engineer.

Design quality & conservation area

According to Section 105Z of the Highways Act 1980, it states that Environmental Impact Assessment is required to be carried out only when the area of the completed works together with any area occupied during the period of construction or improvement by requisite apparatus, equipment, machinery, materials, plant, spoil heaps or other such facilities exceeds one hectare or if it, or any part of it, is situated in a sensitive area. This proposed scheme is neither situated in a sensitive area nor does it exceed one hectare.

This is a world away from the high quality public realm that is being delivered on similar streets by other London boroughs, such as Orford Road in Waltham Forest.

Equalities impacts

Though the report upon which the scheme was approved promised an Equality Impact Assessment, no such document has been made public. The text relating to this is legally flawed, focusing only on direct discrimination, thereby ignoring the statutory duties to reduce inequality in the Equality Act 2010. By failing to provide the much needed step change in conditions for cycling, the scheme would fail to widen the demographics of people who cycle, a core principle of the 2015 Southwark Cycling Strategy. The scheme fails to address a range of inaccessible pavement features, as noted above, so fails to comply with statutory duties to make reasonable adjustments for people with disabilities.

Equalities impacts

An Equalities Impact Assessment will be issued as part of an Appendices of the IDM report. The public consultation was open to all members of the public - age, disability, gender reassignment, ethnicity, pregnancy and maternity, religion or belief, sex, sexual orientation and marriage and civil partnership, which complies to the Equality Act 2010.

Based on the result of the public consultation, analysis of the respondents with a disability showed that 80% agreed with the proposals. It should be noted that of the 25 respondents, three live within the consultation area, all of whom are in agreement with the scheme proposals. This further shows this scheme benefits those with disabilities