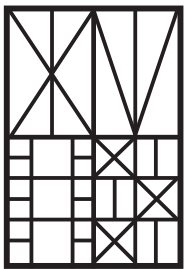


## **New City Court 2018 Scheme / 2021 Scheme**



Proof of Evidence of Russell Vaughan  
- Servicing

June 2022



December 2018 Planning Application (*Appeal Reference: APP/A5840/W/22/3290473*)

December 2018 Listed Building Consent (*Appeal Reference: APP/A5840/Y/22/3290477*)

April 2021 Planning Application (*Appeal Reference: APP/A5840/W/22/3290483*)

April 2021 Listed Building Consent (*Appeal Reference: APP/A5840/Y/22/3290490*)

## **Contents**

1	Introduction and Scope of Evidence.....	1
2	2018 scheme servicing Proposals .....	2
3	Response to TfL representations .....	9
4	Relevant Transport / servicing Policy .....	18

# **1 INTRODUCTION AND SCOPE OF EVIDENCE**

## **1.1 Name and qualifications**

- 1.1.1 My name is Russell Vaughan. I am a Director at Transport Planning Practice (TPP), a company where I have worked since May 2006. Prior to joining TPP, I worked in the transport planning department of Capita Symonds (formerly Symonds Group). During over 20 years in the transport planning teams I have advised mainly private sector clients on a wide range of commercial, residential, retail and leisure developments.

## **1.2 Appointment**

- 1.2.1 TPP was appointed by G.P.E. (St Thomas Street) Ltd (GPE) as transport consultant for the proposed 2018 and 2021 redevelopment schemes (at a site known as New City Court, 20 St Thomas Street, London, SE1 9RS within the London Borough of Southwark (LBS). I have provided transport advice on this scheme since 2016 (CDA.32, CDA.49, CDA.53, CDB.30, CDB.31, CDB.42, CDB.52, CDB.57, CDB.70, CDB.76, CDB.88, CDC.014, CDC.015, CDC.023, CDC.024).

## **1.3 Structure of evidence**

- 1.3.1 The Servicing Statement of Common Ground confirms that the 2021 Scheme is acceptable from a transport perspective. It is therefore not discussed further in this evidence, which concentrates on the 2018 Scheme.
- 1.3.2 My evidence comprises the following:
- Chapter 2 –2018 Scheme Transport Proposals
  - Chapter 3 – Response to TfL written representations
  - Chapter 4 – Relevant Transport Policy
  - Appendix – A3 book of images

## **1.4 Endorsement**

- 1.4.1 The evidence which I have prepared, and provide for these appeals, is true and I confirm that the opinions expressed are my true and professional opinions.

## 2 2018 SCHEME SERVICING PROPOSALS

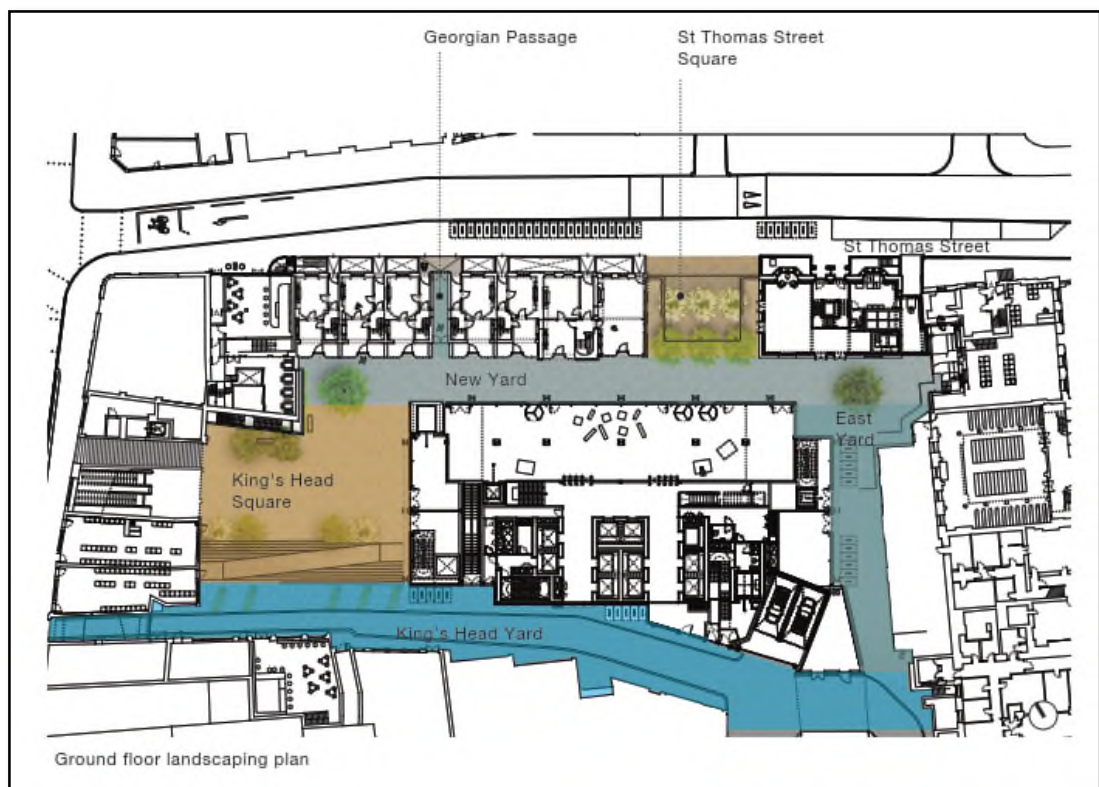
### 2.1 Introduction

2.1.1 As set out in the Servicing Statement of Common Ground, all aspects of the scheme relating to Transport and Highways have been agreed as acceptable by all parties except for the proposed servicing arrangements.

2.1.2 The servicing proposals should be considered in the context of the alterations and improvements to the public realm, which benefit pedestrian connectivity and safety. This chapter therefore describes the proposed public realm and provides details of the servicing arrangements for the proposed 2018 development (the '2018 Scheme').

### 2.2 Public realm improvements

2.2.1 As further detailed in the proof of evidence of Simon Allford, the pedestrian realm would be improved throughout, with increased permeability between King's Head Yard and St Thomas Street. The public realm within the 2018 Scheme comprises a variety of new spaces including squares, passages and yards as illustrated below.



2.2.2 The main Tower would have a pedestrian entrance from New Yard which is one of the two yards created by the public realm proposals within the site. The Yard would be for pedestrian use only and would link with St Thomas Street through the proposed St Thomas Street Square.

- 2.2.3 Accessibility would be further enhanced through opening up of the original passage through the Georgian Terrace linking the site with St Thomas Street.
- 2.2.4 The 2018 Scheme would open up the rear of the London Bridge Underground station building at ground level to provide a new exit directly into the site's largest public space (King's Head Square). This is supported by TfL and London Underground. The Appellant would enter into a development agreement with London Underground to undertake these works, heads of terms for the development agreement have been agreed. The section 106 agreement to be entered into between the Appellant, TfL and LBS will also provide for the carrying out of these works.
- 2.2.5 As part of the development proposals, King's Head Yard will also be improved to offer a better pedestrian environment. The yard would operate predominantly as a car-free area given the very low vehicle movements on this road. In order to maintain the very low traffic flows and ensure that the route is as attractive to pedestrians as possible, the proposed development's basement service yard would not be accessed via King's Head Yard. King's Head Yard would continue to provide an alternative pedestrian route to the south of the site to the Guy's Hospital complex via Beak Alley, whilst predominantly avoiding the service vehicles which would be using White Hart Yard.
- 2.2.6 These proposals represent a significant improvement over the existing situation for pedestrians, with improved public realm, and an easier and more direct access into the station. The additional pedestrian routes allow walkers to avoid the currently congested and narrow footways directly to the north west of the site.
- 2.2.7 The details of the transport related proposals for the 2018 Scheme are contained within the transport assessment submitted as part of the planning application (CDA.32) and summarised in the Servicing Statement of Common Ground.

## **2.3 Servicing arrangement**

- 2.3.1 The servicing arrangements for the 2018 Scheme are detailed in the transport assessment (CDA.32) and the Servicing Statement of Common Ground.
- 2.3.2 These proposals were worked up following discussions with both TfL and LBS and represent the best solution for servicing the scheme given the site constraints. Under these proposals 23 LGVs (Transit van sized vehicles weighing less than 4.6 ton), would be accommodated within the development, with only five larger delivery vehicles (vans and lorries over 4.6 ton) and two refuse collection vehicles stopping on the highway, in a similar manner to the existing situation.

- 2.3.3 Concerns were raised by LBS and TfL with regard to the intensification of servicing vehicle trips on White Hart Yard and available usage of the loading bay on St Thomas Street. Following submission, additional work was undertaken (in consultation with LBS and TfL) in order to demonstrate how the servicing trips could be consolidated, minimising these impacts (CDA.49). This consolidation strategy is discussed in the Servicing Statement of Common Ground and is summarised in paragraph 2.4 of my proof of evidence.

## **2.4 Vehicle impact with consolidation**

- 2.4.1 The strategy has been developed based on a quantitative approach in consultation with highly experienced logistics experts providing a high level of confidence in the proposed consolidation opportunities and represents a tangible and deliverable strategy for this proposed development at New City Court. This was presented to both TfL and LBS on 26<sup>th</sup> July 2019, who accepted the findings and rationale of the consolidation report. This is confirmed in the GLA stage 1 report (CDG.02) which noted that:

*"Under normal circumstances, an office development of this size would be expected to be serviced entirely off-street. However, in this instance, GLA and TfL officers accept that there are exceptional circumstances and site constraints which mean that it is not desirable to provide an entirely off street deliveries and servicing strategy for the site in this instance. These constraints relate to heritage assets to be retained and the potential impacts on pedestrian and cyclist permeability through the site and the presence of London Underground infrastructure.*

*As requested, the applicant has undertaken studies to demonstrate how the site could theoretically be serviced entirely on-site. This strategy would require Keats House to be moved to the left within the proposed plans to accommodate a ramped access route for heavy goods vehicles from St Thomas Street. This move would have a number of negative consequences for the proposed scheme in terms of heritage; public space provision; pedestrian movement and permeability through the site; and, urban greening. The size of the entrance plaza facing St Thomas Street would be significantly reduced and the secondary yard route to the east of the building effectively removed. The proportion of inactive frontages would be increased and the overall quantum of public realm reduced by 24%. Vehicles would also need to cut across the footway on St Thomas Street which would raise concerns in terms of safety and pedestrian movement. A number of the public benefits of the scheme relating to the restoration of Keats House and provision of high quality public space would also be undermined. As such, on balance, GLA*

officers do not consider this approach to be an appropriate servicing strategy for the scheme.” (paragraphs 74 and 75, GLA Stage 1 Report).

2.4.2 The conclusion of the GLA stage 1 report confirms “*the servicing strategy is acceptable in principle*”, subject to the detailed design and the agreed restrictions on servicing arrangements being secured by planning condition and / or obligation (p.21, GLA Stage 1 Report).

2.4.3 The following figures summarise the findings of the consolidation report (CDA.49).

### **White Hart Yard servicing**

2.4.4 Figure 2.1 shows that following consolidation 23 LGVs will service the development via White Hart Yard each day. A higher quality version of this image is available at Appendix 1.

**Figure 2.1 Consolidation study for White Hart Yard**



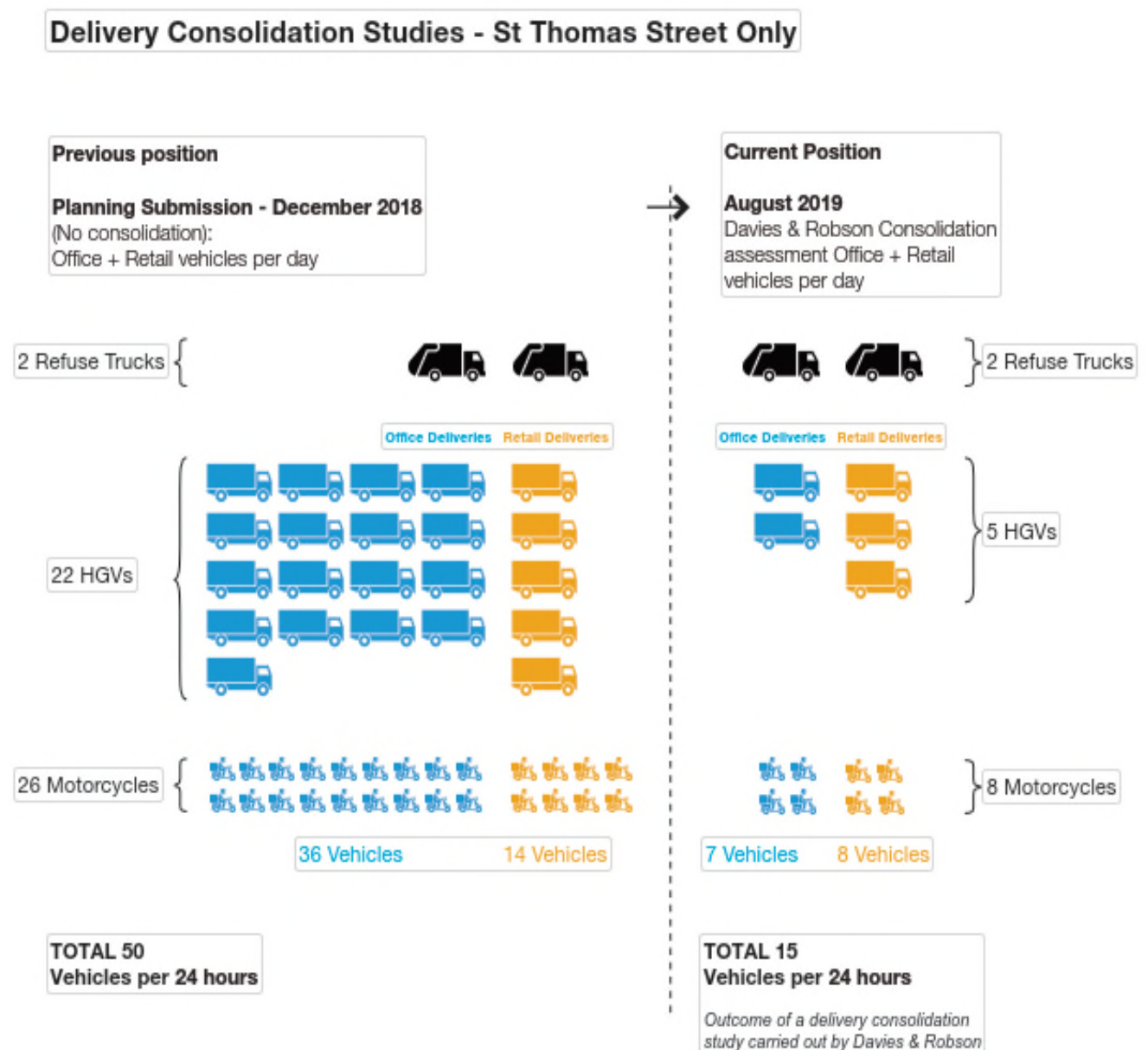
2.4.5 Whilst there is an increase in servicing vehicles using White Hart Yard, these are reduced to 23 vehicles over a 24 hour period. Due to the proposed servicing

regime, none of these deliveries will take place during the peak pedestrian periods, so the increased conflict with pedestrians is low, with a maximum of four vehicles an hour, all occurring outside of the peak pedestrian periods.

### ***St Thomas Street servicing***

- 2.4.6 As summarised below, the proposed consolidation also results in a reduction in servicing HGVs using St Thomas Street from 22 vehicles to five meaning there will be greater availability of the on-street servicing bay. A higher quality version of this image is available at Appendix 1.

**Figure 2.2 Consolidation study for St Thomas Street**

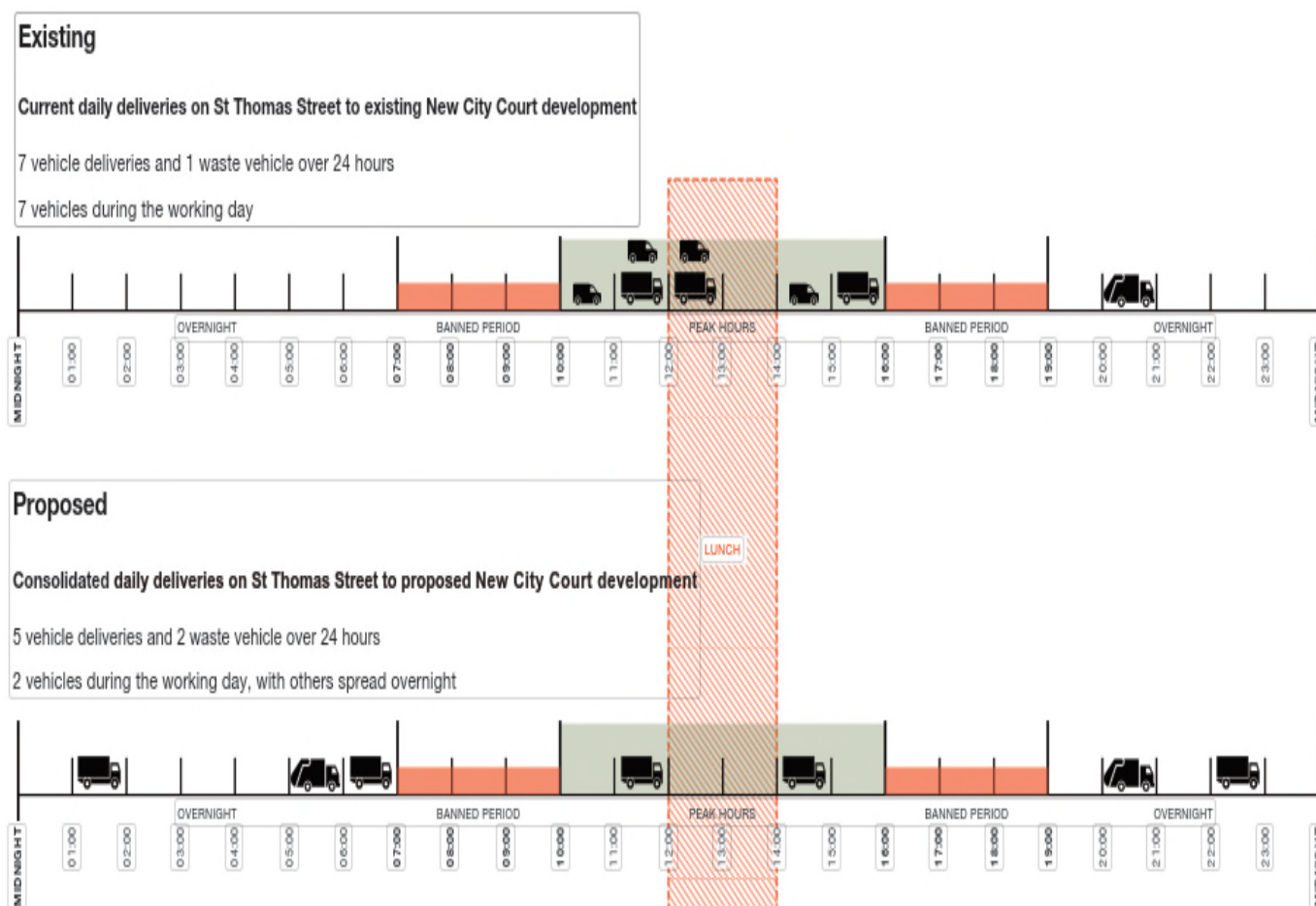


- 2.4.7 This consolidated approach compares favourably with the existing situation, as there will be a reduction in vehicles using the loading bay during the working day



as highlighted below. A higher quality version of Figure 2.3 is available at Appendix 1.

**Figure 2.3 Daily deliveries on St Thomas Street**



2.4.8 As indicated in Figure 2.3, the number of vehicles servicing the development from St Thomas Street (excluding cycles and motorcycles) is similar to the existing situation, albeit with more deliveries taking place overnight and avoiding the peak pedestrian and vehicle hours. Following consolidation, the proposals therefore represent an improvement over the existing situation, with reduced conflict with other road users and less likelihood of congestion in the on-street loading bay.

### ***Overall servicing***

2.4.9 Following consolidation, the large reduction in proposed vehicles reduces the impact of vehicle movements both on White Hart Yard and St Thomas Street in comparison to the original application. The expected number of deliveries is only 38 a day, with a maximum of seven HGVs (including refuse vehicles) and eight motorcycles. No deliveries will take place in the AM, PM or lunchtime peak hours in order to reduce conflict with pedestrians.

2.4.10 Following consolidation, the reduced vehicles and the stringent management of the deliveries contained within the servicing proposals represent a sensible and pragmatic solution that will not have a discernible detrimental impact on pedestrians or other road users. Indeed, when viewed as a whole, the improved permeability through the site, direct access into the underground station and reduction in pedestrians at the junction of St Thomas Street and Borough High Street more than offsets the slightly increased conflict at certain off-peak times on White Hart Yard as detailed in paragraph 2.4.5.

### 3 RESPONSE TO TFL REPRESENTATIONS

- 3.1.1 Written representations were prepared by TfL in a letter dated 16<sup>th</sup> March 2022 (CDC.024). TfL's representations raise a number of perceived issues relating to the servicing of the 2018 Scheme, and raise no issues in relation to the 2021 Scheme.
- 3.1.2 In this section, I respond to the issues raised by TfL in the letter. For ease of reference, I set out TfL's representations in *italics* and my response in **bold**. The representations are given in the order used in TfL's letter.
- 3.1.3 *"White Hart Yard is very narrow, and the access off Borough High Street is through a gap in the façade of the terrace, see photographs TfLP3 and TfLP4. The buildings severely reduce the visibility splays for exiting vehicles, requiring drivers to 'nudge' their vehicles out onto the footway before they can see" (Paragraph 27 of TfL's letter).*
- 3.1.4 **TPP response: The narrow access and reduced visibility splays for exiting vehicles help control the vehicles' speed and encourage drivers to carefully pull out across the footway. This has resulted in there being no recorded accidents involving pedestrians and vehicles at this junction.**
- 3.1.5 *"This stretch of Borough High Street is very busy with pedestrians and cyclists, hence the introduction of the London Streetspace scheme of widening the footway (see photographs TfLP5 and TfLP6) made under a Temporary (Covid) Traffic Regulation Order. TfL intends to reinforce this footway widening using an Experimental Traffic Regulation Order in the very near future, with barriers replaced by tarmac. The eventual goal is to secure via a Permanent Traffic Order" (Paragraph 28 of TfL's letter).*
- 3.1.6 **TPP response: The widening of the footway in this location allows more space for pedestrians, allowing them to walk further away from the building line and increasing pedestrian - vehicle intervisibility. It therefore assists with mitigating the conflict between vehicles using White Hart Yard and pedestrians walking along Borough High Street and so is welcomed.**
- 3.1.7 *"It is acknowledged that some vehicles already use this access, but the development will introduce an additional 28 vehicle movements per day (with consolidation) which will increase the risk of collisions. The pedestrian amenity and safety of White Hart Yard itself will be reduced, and this is a pedestrian route to the Guys Hospital complex, via Beak Alley." (Paragraph 29 of TfL's letter).*

- 3.1.8 **TPP response:** It should be noted that as part of the consolidation arrangement there will be no deliveries in the peak pedestrian periods (07.00 -10.00, 12.00 -14.00 and 16.00 -19.00). Whilst there is an increase in vehicles using White Hart Yard this arrangement means that there would be no additional conflict for the key eight hours of the day when pedestrian flows are at their greatest.
- 3.1.9 **As part of the proposals all deliveries to the service lifts would use White Hart Yard. Following the removal of the existing eight space private car park, accessed off Kings Head Yard, there would be a reduction in vehicles using Kings Head Yard which will also be improved to offer a better pedestrian environment. Kings Head Yard will operate predominantly as a car-free area given the very low vehicle movements on this road. On this basis, there will be no negative impact on pedestrian amenity or safety on White Hart Yard during the peak pedestrian hours. Outside of the peak pedestrian hours, the limited increase in vehicles (up to four an hour) interacting with the smaller off-peak pedestrian numbers will result in no material reduction in either pedestrian amenity or safety. There would generally be an improvement in the pedestrian amenity on Kings Head Yard.**
- 3.1.10 *"The proposed arrangement for HGVs using an on-street servicing bay on St Thomas Street is also considered contrary to Policy T2 (Healthy Streets) and London Plan policy T7 (Delivery and Servicing) for the following reasons:*
- *Trolleying goods along (the bay may not be directly outside the service entrance) and across the footway will reduce pedestrian amenity and space, and create obstacles for visually and mobility impaired pedestrians."* (paragraph 30 of TfL's letter)
- 3.1.11 **TPP response:** With regard to servicing from St Thomas Street, the submitted proposals are for the loading bay to be located opposite the development service access and goods lifts, ensuring that goods to this development will not have to be trollied along the footway. The existing loading bay location at the far western end of St Thomas Street (although noting that this was prior to the temporary streetworks scheme) would have required more trolleying along the footway to service the existing buildings. Notwithstanding this, the timings of the deliveries (avoiding the peak pedestrian periods – including at lunchtime) mean that there would only be two deliveries during the working day, as opposed to seven

**vehicles in the current situation. I do not therefore believe this concern to be material.**

- 3.1.12 *"The loading bay cannot be dedicated to one user, so may not be available at the time required. This scenario would result in unlawful waiting and potentially blocking on St Thomas Street and/or additional HGV movements in an area of London that has a very restricted road network for HGV 'turns and high cycle and pedestrian movement." (paragraph 30 of TfL's letter)*
- 3.1.13 **TPP response: Whilst it is accepted that the loading bay cannot be dedicated to a single user, the expected number of deliveries per day from St Thomas Street is slightly less than the current situation and there is a reduction in delivery vehicles during the working day suggesting that the proposed arrangement represents an improvement over the existing situation with a reduced risk of unlawful waiting.**
- 3.1.14 *"The loading bay will be on the south side of St Thomas Street, which will reduce footway space and width; this is a location of temporary footway widening for social distancing as part of the London Streetspace plan, due to current narrow footway and high footfall. (see photograph TfLP7)" (paragraph 30 of TfL's letter)*
- 3.1.15 **TPP response: Please see paragraphs 3.1.24-3.1.28 of this proof for my response on this point.**
- 3.1.16 *The 2021 scheme shows that off-street servicing is possible for this site (paragraph 30 of TfL's letter)*
- 3.1.17 **TPP response: Please see paragraph 3.1.34 of this proof for my response on this point. These are two separate schemes each of which should be assessed on its own merits.**
- 3.1.18 *The taxi rank will need to be relocated, putting further pressure on the kerbside in St Thomas Street. (paragraph 30 of TfL's letter)*
- 3.1.19 **TPP response: The current TfL proposals for this element of St Thomas Street do not include a taxi rank and so the taxi rank is proposed to be relocated in any case.**
- 3.1.20 *"Furthermore, as with Borough High Street, we are soon to reinforce this temporary London Streetspace scheme along the southern footway of St Thomas Street via an Experimental Traffic Regulation Order, allowing removal of the barriers and replacement with tarmac. The addition of a loading bay where the 2018 application (and potential relocation of the taxi rank) envisages will reduce*

*footway width in a crucial location and undermine this.” (Paragraph 31 of TfL’s letter).*

**3.1.21 TPP response: The temporary Streetspace scheme was implemented to provide additional footway width to accommodate pedestrians having increased space around them to meet the government guidelines relating to pedestrian proximity / density to reduce the possibility of Covid-19 spreading. As noted, the proposal to reinforce this is only experimental and will need to be consulted on if it is to become permanent.**

**3.1.22 The proposed loading bay is a relocation of the existing loading bay on St Thomas Street servicing the existing New City Court buildings and neighbouring properties. The proposal is for the new loading bay to be demarcated on an area adjacent to, and at the same level as, the adjacent footway. Therefore the loading bay area can be used by pedestrians when vehicles are not using it for servicing, which in relation to this development includes the AM, lunchtime and PM peak pedestrian hours when deliveries to the site are not permitted. Please see paragraph 3.1.28 of this proof for an example of how such use operates in similar areas in central London.**

**3.1.23** *“TfL also has a longer term proposal to deliver a Streets’-based scheme in St Thomas Street (subject to funding and consultation) that will introduce one-way working and a contraflow cycle track to allow two-way cycling; currently cyclists can only travel one-way (westbound). We should know more about the status of this project when there is a long term funding settlement from the government in place.*

*Delivery of this long-term scheme would improve cycle access to and from the development. The cycle track would be on the south side of St Thomas Street, i.e. adjacent to the development, and a loading bay to support the latter and associated relocation of the taxi rank could preclude this project due to lack of width.” (Paragraphs 32 and 33 of TfL’s letter)*

**3.1.24 TPP response: There are a number of alternative schemes that have been proposed by TfL for St Thomas Street, of which this is one option. The existing highway arrangement allows for two way traffic plus a combination of parking, servicing and taxi bays on both sides indicating there is adequate width. In the proposed TfL arrangement there is a kerb build out indicated to the south of the cycle lane that could accommodate**

**the loading bay. The loading bay does not therefore preclude this project due to lack of width.**

- 3.1.25 The aforementioned highway arrangements were noted in the GLA's Stage 1 referral (CDG.02) paragraph 78 as follows:**
- 3.1.26 "The proposed location and design for the loading bay on St Thomas Street would need to be compatible with TfL proposals to improve St Thomas Street, which could include a segregated cycle track. This scheme will prioritise active travel and could include a one way eastbound-only carriageway and a segregated cycle track adjacent to the southern footway. As such, further discussion is required to confirm the location and design of the proposed loading bay on St Thomas Street, in the context of TfL proposals for this street and taking into account the Mayor's healthy streets and vision zero objectives set out in the draft London Plan. Accordingly, further details should be submitted and approved by condition prior to commencement of the development".**
- 3.1.27 This confirms that TfL agree that a solution is possible and can be approved by way of planning condition.**
- 3.1.28 With regard to the acceptability of accessing a loading bay across a cycle lane Figure 3.1 shows two loading bays, one on either side of the road both of which are accessed by crossing a cycle lane, in this instance on Aldgate High Street, just before the west of the Cycle Superhighway CS2 and the entrance to Aldgate Station. This design shows how the loading bay is flush with the footway and can be used by pedestrians when not being used for loading.**



**Figure 3.1 - Flush loading bay provision**



3.1.29 **With regard to the crossing of a contraflow cycle lane this can be managed safely using appropriate road markings and signage. Figure 3.2 and 3.3 show the same two loading bays at 222 London Road which are accessed by crossing a contraflow bus and cycle lane on a TfL red route.**

**Figure 3.2 Loading bays accessed across contra-flow**





**Figure 3.3 Loading bays accessed across contra-flow**



- 3.1.30 *"Alternatively, if space was made available by reducing footway width - contrary to the aims of the Healthy Streets scheme and the existing Streetspace scheme - then goods would have to be trolleyed across the cycle track as well as footway, creating an additional safety and amenity hazard."*
- 3.1.31 **TPP response: Although this solution (where the servicing lay-by is accessed across the cycle lane) is not the proposed solution, it would be possible to locate the loading bay adjacent to the carriageway. Figure 3.4 shows one example of this at a location on the Embankment where bins are trolleyed across a two way Cycle Superhighway and the footway prior to collection. The same lay-by is also used for deliveries.**

**Figure 3.4 Loading bay accessed across Cycle Superhighway**



**(Google Streetview 2021)**

- 3.1.32 **With the proposed out of hours servicing I consider that the additional safety and amenity hazard of this potential solution is minimal.**
- 3.1.33 *"At the time of the 2018 application, the appellant undertook further studies, at the request of TfL and the council, to see if off-street servicing could be achieved, and how service vehicle numbers could be reduced through consolidation. At the time, following conclusion of the studies and negotiations with the GLA, and reflected in the Stage 1 report for that application, TfL reluctantly agreed that there was not a viable alternative to on-street servicing. However, the submission of the 2021 planning application with entirely off-street servicing demonstrates that there is a viable scheme for the redevelopment of this site, one that accords better with Healthy Streets, Vision Zero and London Plan (and local) servicing policy, and this is explored further below."*
- 3.1.34 **TPP response: The 2018 Scheme needs to be reviewed and assessed on its own merits. As previously indicated, the design of the on-street loading bay on St Thomas Street can work with the latest TfL proposals and can be adequately controlled and approved by condition. Servicing access via White Hart Yard would be managed to ensure that there will be no deliveries during the peak pedestrian hours minimising conflict between service vehicles and pedestrians. In my professional opinion, any detrimental impact of the scheme on White Hart Yard is offset by the**

**overall public realm improvements, increased permeability and enhanced London Underground accessibility.**

- 3.1.35 The 2018 Scheme accords with TfL's policies and, following studies and negotiations with the GLA, was agreed to be acceptable subject to detailed design of servicing arrangements being approved and secured. Whether TfL believe that the 2021 scheme might accord better with their policies is not the test as to the acceptability of the 2018 scheme.**

## **4 RELEVANT TRANSPORT / SERVICING POLICY**

4.1.1 A summary of the relevant transport policies against which the servicing proposals have been assessed is provided in the Servicing Statement of Common Ground. The main policy and guidance documents in this regard are:

- National Planning Policy Framework (2021);
- The London Plan (2021);
- Mayor's Transport Strategy (2018); and
- New Southwark Plan (2022).

### **4.2 National Policy**

#### ***National Planning Policy Framework 2021 (NPPF)***

4.2.1 The updated NPPF was released in 2021. It focuses on a presumption in favour of sustainable development. One of the core planning principles relates to actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling and focusing significant development in locations which are or can be made sustainable. Given the sustainable location of the development, close to the rail station, underground and bus stops, as well as being within easy walking distance of a number of key amenities, the scheme's compliance with these requirements is not in dispute.

4.2.2 Paragraph 110(d) of the NPPF states:

*"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:... any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree"*

This confirms that impacts on highway safety can occur as long as they are cost effectively mitigated against to an acceptable degree. I believe that by undertaking a commitment to consolidate the delivers and manage the hours of servicing the 2018 Scheme meets this obligation and therefore accords with policy.

4.2.3 Paragraph 111 of the NPPF relates to considering development proposals and states:

*"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

It is agreed by all parties that the cumulative impacts are not severe, and, for the reasons given in sections 2 and 3 this proof, I do not believe that there is an unacceptable impact on highway safety, a point that TfL must also accept given they confirmed in the GLA Strategic planning application Stage 1 referral (26<sup>th</sup> November 2019) (CDG.02) that *"The servicing strategy is acceptable in principle"*. On this basis it is clear that the development should not be refused on highways grounds.

4.2.4 Paragraph 112(c & d) of the NPPF states that applications for development should:

*"c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

*d) allow for the efficient delivery of goods, and access by service and emergency vehicles;"*

The NPPF accepts that there will still be some level of conflict between pedestrians, cyclists and vehicles, but that these should be minimised. It does not suggest that they can be removed completely. I consider that the proposed consolidation and servicing regime does minimise this conflict, whilst also allowing for the efficient delivery of goods thereby according with this policy.

## **4.3 Regional Planning Policy**

### ***The London Plan 2021***

4.3.1 The London Plan 2021 was adopted in March 2021 and aims to make effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes to ensure impacts on London's transport network are mitigated.

4.3.2 Policy T2 '*Healthy Streets*' states that development proposals should demonstrate how they will deliver improvement to support the 10 Healthy Streets indicators, reduce dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle to connect to local walking, cycling and public transport networks.

- 4.3.3 The removal of the car parking and consolidation of deliveries reduces the dominance of vehicles on the surrounding streets. This is further enhanced by a ban on deliveries during the peak AM, PM and lunchtime pedestrian peaks.
- 4.3.4 The design provides improved public realm, including a new access into the underground station removing pedestrians from some narrow elements of the existing pedestrian network. The scheme therefore complies with this policy.
- 4.3.5 Policy T4 '*Assessing and mitigating transport impacts*' states that Transport Assessments should ensure that impacts on capacity of the transport network are fully assessed and incorporate the Healthy Streets Approach. The cumulative effects of developments should be taken into account.
- 4.3.6 The planning application submission for each scheme included an Environmental Impact Assessment which fully assesses the impact of the scheme on the transport network, including taking into account cumulative developments. The Environmental Impact Assessment concludes that the impacts were either *insignificant* or in the case of White Hart Yard, *adverse of minor significance*. The proposal therefore meets this policy.
- 4.3.7 Policy T7 '*Deliveries, Servicing and Construction*' states that development proposals should facilitate safe, clean and efficient deliveries and servicing. Developments should be designed and managed so deliveries can be received outside of peak hours.
- 4.3.8 The 2018 Scheme facilitates safe, clean and efficient deliveries, and, following consolidation, deliveries will be received outside of peak hours complying with this policy.

***Mayor's Transport Strategy (2018)***

- 4.3.9 The Mayor's Transport Strategy sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years.
- 4.3.10 The central aim of the strategy is to create a future London that is not only home to more people, but is a better place for all of those people to live in. At the heart of this vision is the aim that, by 2041, 80 per cent of Londoners' trips will be made on foot, by cycle or using public transport. As detailed in the TA submitted as part of the planning application (CDA.32), the 2018 Scheme meets these requirements.

## **4.4 Local Planning Policy**

### ***Southwark Plan (2022)***

4.4.1 The relevant policy requirements set out in the Southwark Plan are detailed in the Servicing Statement of Common Ground.

4.4.2 In particular, Policy P50 requires a new development to:

- Minimise the demand for private car journeys; and
- Demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development; and
- Ensure safe and efficient operation of the local road network, the bus network and the Transport for London Road Network; and
- Ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys; and
- Incorporate delivery and servicing within major development sites and not on the public highway; and
- Demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished, and how vehicular movements will be minimised and strictly controlled to reduce danger to vulnerable road users.

4.4.3 The development meets these requirements by removing the existing car parking, providing an on site service area for the majority of deliveries and consolidating the deliveries to reduce vehicles. The highway capacity has been assessed, including taking into account cumulative developments and the network was found to be sufficient.

## **4.5 Summary**

4.5.1 The servicing strategy for the 2018 Scheme has been designed to comply with relevant transport policies at national, regional and local levels.