

## Merton Cycling Campaign Comments on Transport section of Merton Local Plan 2020 Consultation

26 January 2018

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*All comments below have also been submitted as part of the online survey, however for ease we have submitted our comments in their entirety by email.*

Merton Cycle Campaign (MCC) is the local group of the London Cycle Campaign. MCC promotes cycling and seeks to make Merton's streets better and more pleasant places, for the benefit of individuals, local communities and the wider environment by raising awareness of cycling issues, campaigning to improve conditions for cycling and providing a range of services for our members.

Below is MCC's response to the Transport section of the Merton Local Plan 2020; these are in addition to our comments on the rest of the Plan which were submitted in line with the original deadline of 6 January 2018.

After review MCC are concerned that Merton's draft Local Plan 2020 does not demonstrate the necessary determination or assertiveness to significantly increase the number of people cycling in the borough or improve the current position of cyclists and other vulnerable road users. The Policy offers no Borough-initiated action, except in the new (yet to be published) LIP. Section 6.4.2 states that the LIP will be the means by which the Draft London Plan's Policy T5 requirement will be met; based on the experience of the previous LIP in which cycling was largely ignored by the Borough, MCC have little confidence in this as a means to achieve the objectives of the Plan.

The 'contented cycling' cover photo of the Transport Section 6.4 is an example of the only time Merton has shown the necessary determination and assertiveness; however this was implemented in the mid 1990s. This now-vintage example of segregated infrastructure has not been repeated, and is now is very poorly maintained. Not only has this visionary approach not been repeated in 20 years, it is an example of a piece-meal approach to cycling infrastructure that does not truly encourage cycling across the borough – just outside of shot the cyclist has ridden through a forest of bollards, and is approaching a give way sign that will see her potentially join a line of cars.

Section	Comments
Strategic Policy T6.4 Supporting an inclusive and better connected transport Network	6.4 The Potential cycling improvements map, page 6-21, has lines whose meaning is unclear superimposed on a map of Merton. The map needs to demonstrate clearly the routes, connections and type/quality of infrastructure that the Plan's policies aim to deliver, and explanatory text should be added. Ideally it would be integrated into the map setting out the transport options in the Borough, placing it on an equal footing with other modes.

Section	Comments
	6.4.2 states that the policy "Specifically ... sets out our approach and proposals for encouraging increased travel by sustainable modes", however it needs to be acknowledged that the only proven way to increase cycling is to provide safe, Continental-standard cycle routes and this should be a key policy objective of this document.
	6.4.4 states that the "services people need are more likely to be available close by and within walking and cycle distance" but it does not acknowledge that without safe cycle routes (of which there are very few in Merton) people won't cycle - so the wording should be "services are connected to people by safe, Continental-standard cycle routes".
	6.4.5 Freight: the policy does not address the need for freight consolidation or moving to cycle or electric delivery vehicles as means to achieve the sustainable transport objectives.
Policy T6.5 Sustainable and active travel	<p>Policy T6.5 says that Merton will work in partnership with development proposals and TfL, to deliver high quality links or the enhancement of existing pedestrian and cycle routes/networks, for which it refers to shared-use facilities like the Wandle Trail.</p> <p>For pedestrians these are a small part of their pavement 'network', whilst for cyclists existing routes of acceptable quality are few and far between, so in order to achieve the aims of the policy it will be necessary to broaden the ambition to achieving continental-style dedicated cycling infrastructure.</p> <p>Whilst we welcome Merton acting in partnership with the initiatives of other parties when it comes to cycling, we do not believe this will be sufficient to make cycling a favoured travel choice. In addition to this, Merton should have a stated policy to initiate transformative strategies and implementation programmes.</p> <p>The continuous and well-connected cycling routes described in Justification 6.5.2 offer connection between local attractors, but this does not lead cyclists to them from their homes. If, as in Justification 6.6.3, 80% of all trips are to be made on foot, by cycle or on public transport while incorporating 20 minutes of active travel a day, then homes in Merton must all be near to safe (i.e. low-traffic, low speed, segregated) cycle routes. For anyone in Merton an urban centre is no more than 10 minutes away by bicycle.</p>

Section	Comments
	<p>The policy proposal at b. is unclear in its meaning, and the apparent focus on cycle parking rather than infrastructure in general will not in isolation make any significant difference to cycle modal share. We suggest the following changes are made to the wording:</p> <p>"Making sure that cycle infrastructure meets or preferably exceeds the minimum standards set out in the London Plan. Cycle parking and cycle routes must be designed to accommodate the needs of disabled cyclists and the dimensions of non-standard cycles. A proportion of cycle parking spaces should accommodate non-standard cycles.</p> <p>In particular, the policy must be to remove all chicane barriers and install no new ones, as even one will make an entire route unusable for a non-standard cycle. Instead, where poor sight lines or other factors could lead to conflict with other modes, alternative designs must always be adopted in accordance with Continental best-practice."</p> <p>At d. "High-quality links" should specifically refer to "Continental-quality links".</p>
	<p>The ambition expressed in Section T6.5 is high and one that MCC welcomes:</p> <p>"To make Merton a place where walking, cycling and public transport are the favoured travel choice when planning a journey".</p> <p>However almost nothing in the Plan gives any concrete, workable, measurable indication of what the council will actually do to bring this about. The nearest the Plan comes to a concrete proposal is in para 6.5.2, however the proposals are not measurable. We suggest the following altered wording:</p> <p><b>"This can be delivered by providing and completing safe, legible, continuous and well-connected walking and cycling routes to places where people wish to travel, accessible to users of all abilities, segregated where the presence and/or speed of vehicular traffic would inhibit their wide use; in particular, between local centres, transport interchange's and community facilities. We will also provide green chains and links to and between open spaces, adopt a predisposition to allow cycling in all green spaces and on public rights of way, remove prohibitions of cycling, and enhance the quality and accessibility of existing public rights of way, as well as opening up new access to open/green spaces and nature."</b></p>

Section	Comments
	6.5.4 This section should set out how cycle hire/rental will be used to contribute to the achievement of the sustainable transport goals.
Policy T6.6 Transport impacts of development [and T6.7 Car Parking and Servicing]	<p>The meaning of the policy statement at d. is unclear and we propose the following wording:</p> <p>“Developments should be car-free where possible as new parking spaces will generate more car journeys. To ensure that parking is not displaced onto the street, development proposals must also demonstrate a positive impact on the use of public transport, cycling and walking. This will include the use of S106 obligations to fund new cycle routes, pedestrian facilities, and public transport services.”</p> <p>At f. Proposals for schools should include provision for safe cycle routes to the school to Continental standards.</p>
	6.6.4 should acknowledge that almost all parts of the borough have poor accessibility for cycles due to low-quality, poorly-designed, poorly-maintained or non-existent cycle infrastructure, as well as the poor access to public transport which is acknowledged.
Policy T6.7 Car parking and servicing	The policy at c. should ensure that electric vehicle charging infrastructure should be provided in a way that minimizes street clutter, ideally located by existing telecom "green boxes" or street furniture, and should not occupy space that could now or in the future be used for active travel purposes (cycle routes, cycle parking etc.).
	6.7.5 – should mention how cycle hire/ cycle share can contribute to the achievement of the sustainable transport objectives.
T6.8 Transport Infrastructure	This focuses on the need to "protect existing public transport infrastructure". It needs to also consider the need to protect existing and future cycle routes, both in terms of their existence, and ensuring that conditions (traffic levels, speeds, parked vehicles) do not deteriorate.
	Para 6.6.3 references the Mayor of London's target of 80% of journeys by foot, cycle or public transport by 2041. However this target is largely ignored in Sections 6.6, 6.7 and 6.8 which are almost all directed towards accommodating motor traffic.

## Merton Cycling Campaign Comments on Merton Local Plan 2020 Consultation

06 January 2018

Contact: [hello@mertontyclingcampaign.org.uk](mailto:hello@mertontyclingcampaign.org.uk)

*All comments below have also been submitted as part of the online survey, however for ease we have submitted our comments in their entirety. Our comments on the Transport section will follow.*

Merton Cycle Campaign (MCC) is the local group of the London Cycle Campaign. MCC promotes cycling and seeks to make Merton's streets better and more pleasant places, for the benefit of individuals, local communities and the wider environment by raising awareness of cycling issues, campaigning to improve conditions for cycling and providing a range of services for our members.

Below is MCC's response to the consultation on the Local Plan 2020, closing 6 January 2018; it should be noted that commenting on the Draft Local Plan in relation to cycling, active transport and healthy streets has been hampered by the fact that the consultation draft of the Infrastructure Chapter (which was stated as incorporating Transport policies) was not correctly published to the Merton website. The Transport Section (6.4) of the Chapter was shared with MCC on 4 January when this was drawn to the attention of Officers, and MCC was offered an extension of the deadline to comment on the Transport Chapter, which we appreciate. However we are particularly concerned that this crucial chapter has not been available to residents, local groups and businesses to review and comment on for the full consultation period as Strategic Objective 5 of the Plan aims to '*make Merton a well-connected and accessible place where walking, cycling and public transport are the modes of choice when planning all journeys*' by "*creating streets and routes that encourage the use of cycling, walking and other modes of sustainable travel*".

More generally, we welcome the acknowledgement from the Cabinet Member for Adult Social Care and Health, that the built environment is a major driver of health inequalities and that unhealthy high streets and poor air quality impact negatively on health and the desire for the Local Plan to incorporate health and wellbeing into policies and vision so everyone has a fair chance at a healthy life. It is therefore disappointing that the role that cycling and active transport can have in achieving this objective is not embedded across the policies set out in the Draft. On the evidence of the Draft Plan Policies, it does not appear that the Healthy Streets approach is yet embedded in the Council's thinking. Most policies make more references to main roads, car parking and vehicle access to sites than they do to sustainable transport.

For anyone in Merton an urban center is no more than 10 minutes away by bicycle. But, in most cases, there is little prospect that the cycling route to get there will look accommodating or feel safe. If the public realm is to be designed to prioritise active transport (Policy D5) then it is essential that Merton take account of the Draft London Plan's Policy T5 requirement that, throughout the Borough, barriers to cycling are removed and infrastructure improved to create a healthy environment in which people choose to cycle.'

Cycling needs to be front-and-centre in a strategic plan if there is to be any chance of implementing a coherent network of quality cycle routes – because in individual developments cycling almost always isn't considered.

For 'Housing' the Merton Local Plan 2020 admirably takes serious account of the Draft London Plan's target uplift in housing of 228% proposed for Merton, yet Merton's 2020 Plan takes no account of the Draft London Plans Policy T5 requirement that such Plans should help remove barriers to cycling and create a healthy environment in which people choose to cycle. To be achieved '*through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure*'.

There is a limited scattering of meaningful ‘active transport’ aspiration in Merton’s 2020 policies but not in a way that suggests a proper support of the Draft London Plan’s improved cycle infrastructure.

It is not enough for Merton’s 2020 policies to relate to control of new building development, they must also look to upgrade the existing environment. Merton cannot currently be called welcoming to cyclists because not enough people find it a healthy environment in which to choose to cycle. LIP targets for modal shift are far from being met and Strategies to facilitate cycling recommended in reports by experts commissioned by Merton have not been followed.

Section	Comments
<b>Strategic vision and objectives</b>	<p>Page 3 – Points of Interest omits walking and cycling routes through the borough.</p> <p>Page 4 - Merton the place: given the role of transportation in creating a healthy built environment we suggest that statistics in relation active transport should be included, such as cycling ownership, cycling and walking trips, the number of people reliant on public transport.</p> <p><u>Page 5 – 9 Spatial vision</u></p> <p>1.20. aims to embed “<i>health and wellbeing into all aspects of development</i>,” yet makes no mention of the provision of cycling and pedestrian links. We suggest this is amended to include these explicitly.</p> <p>1.21. articulates how Merton’s environment will have improved. It emphasises the role ‘improvements to public transport’ will have had. We suggest that equal weight should be given to the vision for ‘greater scope for walking and cycling’ to demonstrate the role this will have in achieving the vision for an improved environment, particularly as they are relatively quick, efficient and cost-effective to deliver in relation to major public transport projects.</p> <p>1.25 articulates how Morden town centre will have improved, including through public realm improvements and commuters walking through to access public transport links, but we would like to see the role of good cycling links to the Town Centre and nearby major parks added, and the role this can play in boosting the health of residents, customers, and staff, and contribute to economic success.</p> <p>1.30 sets out a vision for tackling climate change. This vision would be strengthened if it was to state that in 2036 the contribution of non-sustainable fuels to climate change has been recognised by Merton’s residents and businesses, reducing the number of streets used as vehicle car-parks at the public expense, and priority is given to grade-separated infrastructure for sustainable travel by people on foot or pedal.</p> <p>1.31 sets out a vision for a wealth of infrastructure to support the new homes the borough requires, but should also reference the infrastructure to support active transport that will be required, including (properly implemented grade-separated provision for those on foot or pedal, and the implementation of policies that support active transport such as implementation of the 20mph limit and the Borough Curriculum including the requirement for every child to walk or cycle the last mile to their school).</p> <p>Key diagram: should include key walking and cycling routes in the borough.</p>

Section	Comments
	<p><u>Page 10 – 15: Strategic Objectives</u></p> <p><b>Strategic Objective 1: Healthy Places</b></p> <p>This Objective is a key place to demonstrate the Council's commitment to the policies of Liveable Neighbourhoods and Healthy Streets. We suggest that the vision should include "Cycling, walking and public transport will be the preferred modes of transport in the borough."</p> <p>An additional tactic to achieve this objective should be added which acknowledges the role that promoting cycling and walking can play in achieving Healthy Places.</p> <p>The final bullet point "Promoting road safety to encourage responsible behavior by all users of the public highway." Is wording which perpetuates a false equivalence between behavior of vulnerable road users (who pose little danger to others) and drivers (who pose great danger to others, particularly vulnerable road users). "Road Safety" can mean interventions that reduce freedoms for vulnerable road users, whereas the objective should be "road danger reduction". The word "encourage" hardly inspires confidence in the Council's intent to take this seriously.</p> <p><b>Strategic Objective 2: Place</b></p> <p>There's no acknowledgement that motor traffic is often the number one element that detracts from a sense of "place". There should be a commitment that cycling is treated equally as a preferred form of transport and a healthy leisure activity. There should be a predisposition to permit it in all parks and open spaces.</p> <p><b>Strategic Objective 3: Housing</b></p> <p>There needs to be an acknowledgement that high housing density is incompatible with car use by residents, both because land use presents a choice between housing for cars and housing for people, and because more residents using cars requires more road space.</p> <p>Explicit reference should be made to the fact that continental-quality cycle routes are essential to support this housing and population growth to enable residents to travel. Away from public transport hubs, the only public transport is the bus, and due to congestion, these are often slow. It is unrealistic to reference "public transport" as the only mode, especially at a time when bus ridership is going down. (Indeed, the idea of public transport as the only available mode contradicts Section 5).</p> <p><b>Strategic Objective 4: Environment</b></p> <p>The role of reducing car use, addressing congestion and promoting a modal shift to cycling and walking should be added in order to achieving the objective of making Merton an exemplary borough in mitigating and adapting to climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.</p> <p><b>Strategic Objective 5: Infrastructure</b></p> <p>This section is not drafted in a way that shows the Council appreciates there is a long way to go before cycling is perceived by most people as a choice, let alone a preferred choice. There is no mention of removing barriers to cycling, or the fact that fear of traffic is the</p>

Section	Comments
	<p>number one reason why people don't cycle. We would like to see a clear statement that a Continental-quality cycle route network is a precondition to cycling being a preferred transport choice for most people.</p> <p><b>Strategic Objective 6: Economy</b> There needs to be an acknowledgement that visitors should come by public transport or by cycle, and local journeys to shops etc. should be by active modes (walking or cycling).</p>
<b>Health and Wellbeing</b>	<p>Health and wellbeing Policy HW 2.1 To improve the health and wellbeing of all residents, Merton will <i>g) Encourage more active transport use to help improve the health and wellbeing of people and assist in reduce air pollution in the borough, especially in areas identified as Air Quality Focus Areas in Merton's Air Quality Action Plan;</i></p> <p>Mention should be made of how Active Transport can contribute to the borough achieving the inter-connected goals of sustainability, health and wellbeing, and inclusive economic growth.</p>
<b>Our places (also containing sites proposed for allocation and land designations)</b>	
Colliers Wood	<p>Policy N3.1 Colliers Wood At (b) cyclists should be explicitly mentioned in the list of those that the environment in Town Centres should be made more attractive to, as it brings similar benefits and achieve the objective of creating a thriving and attractive District Centre at Colliers Wood.</p> <p>At (h) the improvements to reduce road congestion and improve the public realm particularly for pedestrians and cyclists, should specifically mention improving cycle routes across the borough to continental levels of quality, ideally prioritising the provision of grade-separated infrastructure for sustainable travel by people on foot or pedals, rather than just mentioning the Wandle Trail and a non-specific reference to 'transport infrastructure'.</p> <p>As the Sutton Link is still in the route appraisal stage, and Colliers Wood is one of the points of origin being considered and currently consulted on, mention should be made here of Merton's support for the link, in the same way as it is in the Mitcham Town Centre Section. MCC support the link but believe it should be designed as an integrated cycling route from the start, as a fully sustainable route and would like to see this aspiration reflected in the Local Plan.</p> <p>3.1.7 and 3.1.8 – we agree with the comments regarding integrating the three large retail sites with better public transport access and improving walking and cycling access and the links between the sites. However, the policies set out in this section (and elsewhere in the Draft Plan) must go further in being explicit to respond to these comments and ensure that future development meets the aspiration.</p>

Section	Comments
	<p>3.1.20 – We welcome consideration of new (tall) buildings being designed and orientated to mitigate the potential for uncomfortable wind conditions at ground level which would particularly affect pedestrians and cyclists.</p> <p>3.1.23 - better street layout to attract more office use would benefit from prioritisation of cycling and walking through the area. Employers also benefit from their staff walk or cycle to work - studies have shown that there is a 27% reduction in sick leave where staff commute by foot or pedal.</p> <p>Site id CW2: Brown and Root Phase 2 Mention is made of the recent significant investment that has recently been made in the public realm for walking and cycling in and around the site; would request that future plans encourage this to be enhanced further.</p> <p>Site id CW5 - Priory Retail Park – we welcome the suggestion to reduce car parking and improve air quality, However the policies set out in this section (and elsewhere in the Draft Plan) must go further in being explicit to respond to these comments and ensure that future development meets the aspiration.</p>
Mitcham	<p>N3.2 Mitcham Town Centre: MCC welcome the aim is to improve the overall environment of Mitcham town centre by providing quality shopfronts, new homes and good transport links and will be done (in part) by making the town centre easier to get to by cycling. However, policies relating to cycling are then notably lacking from the rest of the section; this is particularly striking at bullet point G-K don't mention cycling (or walking) at all; this section should be amended to include the provision of high quality cycling infrastructure and links as one of the conditions that development should meet in order to garner the council's support.</p> <p>3.2.8 – agree that Merton-Sutton Link should be supported, but it should be designed as an integrated cycling route from the start, as a fully sustainable route; routing through Mitcham would also provide greater benefits. As the Sutton Link is still in the route appraisal stage, and Colliers Wood is one of the points of origin being considered and currently consulted on, mention should be made here of Merton's support for the link, in the same way as it is in the Mitcham Town Centre Section.</p> <p>3.2.12 Surrounding area of North Mitcham – improvements to the cycle infrastructure at key junctions (particularly Figges Marsh roundabout) are necessary to achieve the stated objective of increasing cycling in the borough.</p> <p>Site Mi1, Benedict Wharf: conversion of this site to residential will require improved cycling infrastructure to and from the site, particularly down Church Road and London Road, to ensure that any new development achieves the objectives of the Local Plan, and the references to cycling in this section should be strengthened to reflect this.</p>

Section	Comments
	<p>Site Mi8 Majestic Way 1-12: redevelopment of this site has the potential to radically improve the permeability of Mitcham Town Centre and its cycling connections to and through the area, so the site allocations should specifically mention this to ensure that the opportunity is not lost.</p> <p>Site Mi12 Sibthorpe Road Car Park – specific mention should be made to the opportunity for redevelopment of this site to improve permeability and cycle routes through and to Mitcham Town Centre</p> <p>Site Mi16 Mitcham Gasworks – redevelopment of this site has the potential to contribute to the improvement of cycling connections to and through the area, particularly from Church road to Western Road and on to Figges Marsh, so the site allocation should specifically mention this to ensure that the opportunity is not lost.</p>
Morden	<p>N3.3 Morden sets out a vision for the future of Morden which will have “healthier streets with better connectivity and permeability for pedestrians and cyclists;” and “reduce traffic dominance, improve walking, cycling and vehicle links into and around the town centre.” However, it is impossible to see that “pedestrians and cyclists [are] the priority” while the gyratory remains. MCC supports the exploration of its potential removal at 2.3.35 but would ask that this is strengthened to a policy of pursuing and securing its removal.</p> <p>2.3.39 talks of “routes that are realistic to walk or cycle” but misses the most important point. Permeability and connectivity are important, but road danger is the number one reason more people don’t cycle: there must be a commitment to Continental-quality cycle routes for the aspiration to improve cycle routes to be credible.</p> <p>As the Sutton Link is still in the route appraisal stage, and Morden is one of the key interchange points for the route from South Wimbledon, it is strange that no mention is made of Merton’s support for the link at I) which sets out examples for transport improvements that would be supported. It is particularly surprising as explicit support for the link is given in the Mitcham section, which is not a point of origin for the Link. Explicit mention should be made of Merton’s support for the link in this section.</p> <p>MCC supports the principle of the Merton-Sutton Link, but believe it should be designed as an integrated cycling route from the start, as a fully sustainable route, and that this should be given weight in policy terms if it is to achieve the Local Plans vision.</p>
Raynes Park	<p>The developments in the Raynes Park section, particularly RP2, RP3 and RP4 developments are all large developments and close together and could form a significant opportunity to either get new travel options right or get it badly wrong. There is a significant opportunity here for cycling. The three sites lie just south of the New Malden - Raynes Park link that is under construction, and so could be connected to the major Kingston Road - New Malden - Raynes Park - South Wimbledon - Colliers Wood - CS7 cycling axis, as well as the New Malden - Raynes Park - Wimbledon cycling axis.</p> <p>The Raynes Park policy should explicitly encourage the connection of these sites through high quality links that would support a high level of cycling. This could include full segregation on Burlington Road and West Barnes Lane. These already have sections of low-quality</p>

Section	Comments
	<p>cycling lanes which could be upgraded, and gaps filled in. It might also be possible to open cycling links from these sites to the north alongside the A3, to connect to existing routes towards Richmond Park.</p> <p>To encourage active transport links to the most northerly of the three sites, RP4, then residential development on the site should have site access orientated towards the north (Bodnant Gardens). If access is maintained from the south, nobody is going to cycle or walk along the noisy, polluted Bushey Road flyover and adjacent service roads, and so that would just result in another car-orientated development.</p>
Wimbledon	<p>N3.6 Wimbledon In order to ensure the Plan meets its objective to ensure that Wimbledon continues to be a thriving destination for businesses, local residents and visitors, a number of omissions of the role that cycling can play in achieving this should be addressed.</p> <p>The promotion of "<b>pedestrian and cycling routes</b>" should be added at "c. Supporting midrise contextual architecture with traditional urban blocks of high-quality design, active streets and a tight grain to promote pedestrian routes;"</p> <p>The integration of the Healthy Streets approach to placemaking strategies would assist in achieving the objective and should be integrated at point (h): "<i>h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and participate in the town centre, including a town square, pedestrian laneways, <b>high-quality cycle routes</b> and parklets;</i>"</p> <p>TfL's publication 'Walking and Cycling the economic benefits' (November 2018) finds that facilitating walking and cycling is important for attracting staff and then retaining staff, additionally employers experience a 27% reduction in sick leave where staff commute by foot or pedal, so prioritising cycling will support the achievement of e. Encouraging office development to support businesses and jobs.</p> <p>k. Securing investment in Wimbledon station to improve the passenger experience, help manage the increase in patronage and provide space for new shops, services and town centre activities, working with Crossrail2 and Network Rail.</p> <p>The desire to improve the passenger experience for those using Wimbledon station would be strengthened by an explicit policy direction to promote electric bike hire at Wimbledon (the location adjacent to an escarpment hill offers a major opportunity for electric bike hire). In which respect Wimbledon proposals should not only be requiring the usual bike parking for all developments but this should also include charging points for electric bicycles/mobility scooters within developments and on the streets.</p> <p>The initiatives for encouraging active transport are more clearly spelt out in the other urban centres included in the 'Local Plan 2020' and we would ask that they are more explicitly spelt out in this section as well.</p>

Section	Comments
	<p>To ensure that the objective to connect the surrounding neighbourhoods to Wimbledon is achieved, there should be an explicit policy for making the centre easier to get to for pedestrians and cyclists (as set out for Mitcham) and generally better connectivity and permeability for pedestrians and cyclists; with pedestrians and cyclists as a priority (as set out for Morden).</p> <p>MCC notes that Justification Item 3.6.17 Refers to commitments 'As set out in the draft transport policies' but no such policies appear in Merton's 'Local Plan 2020'. However, it has been impossible to assess these policies while reviewing the Wimbledon chapter as the Transport Chapter was not published until the 4<sup>th</sup> of January after MCC drew its absence to the attention of the Council.</p> <p>Whilst MCC supports the principle of the Sutton Link we do not support the route option currently under consultation which starts in Wimbledon; the route does not provide any additional benefit that could not be achieved by simply increasing the frequency of the current rail service, has a construction timetable that would be beholden to Crossrail 2, and would in fact decrease the provision for cyclists as it is possible to take bicycles on the current rail service, but under current policies it would not be possible to take them on a tram service.</p> <p>For such a thriving destination Merton is also missing a trick by not promoting bike hire at Wimbledon. The location adjacent to an escarpment hill offers a major opportunity for electric bike hire. In which respect Wimbledon proposals should not only be requiring the usual bike parking for all developments but this should also include charging points for electric bicycles/mobility scooters within developments and on the streets.</p>
South Wimbledon	<p>MCC support the Strategic Vision for South Wimbledon to be Merton's newest Local Centre and will be thriving thanks to increased footfall due to new homes and "improved Public Spaces along Merton High Street and Morden Road".</p> <p>In particular MCC welcome this desire to improve a junction that has the 11<sup>th</sup> worst air quality in London and is inhospitable to cyclists and pedestrians.</p> <p>If the commendable South Wimbledon proposals are to reduce the need to travel by vehicle and promote the commercial, health and pollution-free benefits of active transport then this can only happen if the Borough infrastructure is transformed to encourage people to choose to cycle.</p> <p>Clear policy direction should be incorporated to ensure that development in the area supports the creation of Healthy Streets and livable neighborhoods, promoting cycling and walking.</p> <p>MCC Support a secondary pedestrian entrance to the underground station off the busy main roads and would like to see this brought forward even without the overall re-development of South Wimbledon station, (which we also support).</p>

Section	Comments
	<p>As the Sutton Link is still in the route appraisal stage, and South Wimbledon is one of three points of origin under consultation, it is strange that no mention is made of Merton's support for the link at h. which sets out support for improvements to the transport infrastructure that will help to reduce road congestion. It is particularly surprising as explicit support for the link is given in the Mitcham section, which is not a point of origin for the Link. Explicit mention should be made of Merton's support for the link in this section.</p> <p>MCC support the principle of the Merton-Sutton Link but believe it should be designed as an integrated cycling route from the start, as a fully sustainable route, and that this should be given weight in policy terms if it is to achieve the Local Plans vision.</p>
Housing	<p>It is disappointing that no mention is made of the need for public or active transport options to serve the increase in homes and residents; the policy should explicitly reference measures that encourage the reduction of car parking and the increase of cycle parking and charging points for electric bicycles.</p> <p>Given the pressure on land and shortages of development sites which the Plan references it is disappointing that there is no recognition that many car parks could be used for housing and car parking spaces take away from land available for housing. If we prefer to house people instead of cars, then sustainable transport infrastructure including Continental-quality cycle routes are a prerequisite. People who live car-free should not be socially or economically excluded due to poor transport alternatives.</p>
Design	<p>Design</p> <p>For anyone in Merton an urban centre is no more than 10 minutes away by bicycle. But, in most cases, there is little prospect that the cycling route to get there will look accommodating or feel safe. If the public realm is to be designed to prioritise active transport (Policy D5) then it is essential that Merton take account of the Draft London Plan's Policy T5 requirement that barriers to cycling are removed and infrastructure improved to create a healthy environment in which people choose to cycle.</p> <p>Strategic Policy LP D5.1 concerning Design item c) states: <i>The public realm should be designed with priority for pedestrians and cyclists in mind and encourage greater walking and cycling around the area.</i></p> <p>Design Policy D5.2 Follows on: <i>Proposals for all development and works to the public realm ..must accord...with .. principles of good urban design: a) The creation of urban layouts based on a permeable and easily navigable network of recognisable streets and spaces that link in seamlessly with surrounding development and facilitate walking, cycling and use of public transport.</i></p> <p>In order to achieve these objectives MCC would ask that Merton acknowledges that a fundamental change is needed to increase cycling modal share. This will require high-quality, continental-standard cycling and walking infrastructure and the integration of the healthy streets and livable neighborhoods approaches.</p> <p>This section has no mention that motor traffic dominance is the primary factor that destroys a sense of "place". Motor traffic quickly turns a public realm into a private realm. Cars, whether parked or moving, are private spaces. Car parking reduces space available for active travel modes, while motor traffic dominates the environment, making it hostile to active travel, cycling particularly. Motor traffic introduces noise and pollution, making the streetscape a place no-one wants to linger, which harms businesses.</p>

Section	Comments
	<p>D5.2 should explicitly include measures to control the electric car charging points. These are likely to proliferate in coming years as the government encourages motorists to switch to electric vehicles. They are a new form of street clutter, and if no thought is given to their size and siting, they will take away from space available for walking and cycling.</p> <p>5.2.10 Gated Development: What is missing here is an acknowledgement that gated developments harm the permeability of an area and make it less easy to cycle or walk through.</p> <p>LD5.6: Advertising on streets often represents street clutter that takes away from space that could otherwise be used for cycling.</p>
<b>Infrastructure (schools, healthcare, cycling, streets, travel, utilities waste, digital)</b>	<p>Up until Friday 4 January (two days before the Consultation closed) this chapter was described online as the section that addressed “schools, healthcare, cycling, streets, travel”; after reviewing the document and noting that there was only one passing reference to cycling. (6.2.5) and very little on transport in general, MCC queried this with Merton Officers who confirmed that the Transport Chapter had not been published to the website. It was provided by email to MCC and an extension of two weeks offered to comment on this chapter, and the website was updated. Whilst MCC appreciate the extension, we are concerned that no other resident, group or organisation has been granted the same extension to comment on a crucial chapter of the draft Local Plan which interfaces with so many other policies and is in fact referenced explicitly as a means by which other objectives will be achieved.</p> <p>After the publication of the Transport Chapter separately on Friday 4th, the description of the Infrastructure chapter was updated to say it addressed “schools, healthcare, utilities waste, digital”; however MCC believes the Chapter is either incomplete or inadequate as it talks generically about social and community facilities and infrastructure with only passing specific references to schools and health facilities, and makes no mention at all of utilities or digital infrastructure.</p> <p>MCC’s comments on what is included in the Chapter are:</p> <p>We welcome the reference at 6.2.5 to transport in terms of greater community inclusion when facilities (social and community) are easily accessible by public transport, cycling and walking.</p> <p>The aspiration at 6.2.10 to encourage sport/leisure and healthy communities should reference that cycling is an activity to be promoted rather than restricted and suppressed. There should be a predisposition to permit and enable it in all parks and open spaces.</p>
Transport	<p>Policy 6.4. Infrastructure: Transport</p> <p>Up until Friday 4 January (two days before the Consultation closed) this chapter was described online as the section that addressed “schools, healthcare, cycling, streets, travel”; after reviewing the document and noting that there was only one passing reference to cycling. (6.2.5) and very little on transport in general, MCC queried this with Merton Officers who confirmed that the Transport Chapter had not been published to the website. It was provided by email to MCC and an extension of two weeks offered to comment on this</p>

Section	Comments
	<p>chapter, and the website was updated. We are therefore unable to comment on this section at this time and will submit our comments by the revised deadline of 20 January.</p> <p>Whilst MCC appreciate the extension, we are concerned that no other resident, group or organisation has been granted the same extension to comment on a crucial chapter of the draft Local Plan which interfaces with so many other policies and is in fact referenced explicitly as a means by which other objectives will be achieved.</p>
Waste	<p>6.3 Waste Management</p> <p>It should be acknowledged that currently there are a lot of trips by private car to waste facilities. The Council should address this problem by providing good pick-up services and restricting car access to waste facilities.</p>
Economy	<p>Policy EC 7.1 discusses an increase in the total number of jobs and 7.1.c cites location as the key to reducing the need to travel by car; promoting cycling as the preferred means of travel around the Borough in this policy would support opening up a wider range of locations.</p> <p>Policy EC 7.1.b.vi talks about asking developers to factor in local employment considerations at the end of their development cycle. This should be changed to insist that developers include local employment considerations at the start of their development cycle by considering how they can encourage their staff to walk or cycle to work.</p> <p>Policy EC 7.2 Merton will support proposals relating to employment sites that: <i>c) Have good access to public transport. Proposals for offices and business should be easily accessible by walking and cycling and wherever possible have facilities such as showers and secure cycle parking to support this. Measures to reduce reliance on car travel such as parking restrictions, travel plans, and other appropriate measures will also be required.</i></p> <p>To encourage this type of development Merton must provide an environment in which people choose to walk and cycle. Draft London Plan Policy T5 expects Merton to deliver such an improved cycle infrastructure but at the time of submission it has been impossible to assess if Merton's Transport proposals are adequate to achieve this as the Transport chapter was not published until 4 January; we welcome the extension to comment on the Transport section, but our comments on this section and whether they are adequately supported by the Transport chapter are limited until we have had time to assess this chapter.</p>
Centres	<p>EC 7.6 doesn't acknowledge the fact that town centres are basically thoroughfares for motorised transport and are consequently unhealthy and dangerous places to spend time. Policies to encourage people to walk or cycle to and from town centre should be explicitly included here, re-inforcing those set out in some other chapters, such as Morden or Mitcham. Incorporation of the healthy streets and liveable neighbourhoods approach to Town Centres, including pedestrianisation and increasing secure cycle parking would encourage an increase in cycling and walking trips and encourage people to spend longer in our centres, with the attendant economic benefits – TfL's publication 'Walking and Cycling the economic benefits' (November 2018) finds that facilitating walking and cycling is</p>

Section	Comments
	important for attracting staff and then retaining staff, furthermore walking and cycling improvements can increase retail spend by up to 30%.
Business	<p>EC 7.2.c is a good start in recognising that showers and cycle parking should be factored into new plans. We would ask that this is strengthened to include a minimum requirement for new developments to provide showers and cycle parking for 20% of their workforce.</p> <p>We would like to see EC 7.2.e.iii re-worded to encourage development that affects traffic movement in a positive way towards achieving modal shift to more sustainable and active transport.</p>
Retail	<p>Shops and shopping parades should incorporate the healthy streets and liveable neighbourhoods approach to Town Centres, including pedestrianisation and increasing secure cycle parking would encourage an increase in cycling and walking trips and encourage people to spend longer in our centres, with the attendant economic benefits – TfL's publication 'Walking and Cycling the economic benefits' (November 2018) finds that facilitating walking and cycling is important for attracting staff and then retaining staff, furthermore walking and cycling improvements can increase retail spend by up to 30%.</p>
Environment	<p>MCC welcome the commitment to improving accessibility to open spaces and areas of nature conservation by cycling, mobility vehicles and on foot; and also the promotion of healthy lifestyles, but the role of active transport modes in the promotion of healthy lifestyles should be acknowledged and policies for usage and infrastructure provision reflect this.</p> <p>It has been impossible to assess if the commitment to <i>Improving accessibility to open space will be delivered in tandem with the council's transport and accessibility policies</i> at 8.2.18, as the Transport chapter was not published until 4 January; we welcome the extension to comment on the Transport section, but our comments on this section and whether they are adequately supported by the Transport chapter are limited until we have had time to assess this chapter.</p>
Open space, play space, leisure, green space	<p>Policy O8.5 Leisure, Sport and Recreation: reference should be made to the role of promoting active transport (walking and cycling) and the Healthy Streets approach should be an additional tactic to achieve the objective of encouraging healthy and active lifestyles and improving mental well-being.</p>
Climate Change	<p>Strategic Policy CC8.10 Supporting a more sustainable and resilient environment:</p> <p>Point e) should reference the role of sustainable transport modes (Walking and cycling) to encourage approaches to a low carbon and sustainable place, reducing resource use and increasing local resilience to the impacts of a changing climate.</p>
Flood Risk Management	MCC have no comments to make on the Flood Risk Management section.
Air Quality	<p>Policy P.8.9 Improving air quality and minimising pollution makes no reference to the role of motor traffic has in poor air quality and measures that will be taken to address this.</p> <p>MCC may have further comments on this air quality section once we have reviewed the Transport chapter was not published until 4 January.</p>