

Merton Cycling Campaign

Response to Merton Local Plan (Consultation Stage 2a)

26 Jan 2021
Version 1.0

Introduction

This document has been prepared by Merton Cycling Campaign as a response to the consultation by Merton Council on the “Stage 2a Draft Local Plan” retrieved Jan 2021 from <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan>

General Comments

First we wish to acknowledge the effort that has gone into preparing this plan, under the especially trying circumstances of the last year. Our comments are offered in offered in a spirit of constructive collaboration.

We believe the plan is too short-term in its ambition, and does not acknowledge the magnitude of the transformation that is necessary to tackle the climate emergency, which is the stated objective of the Council. In particular, Merton is highly reliant on motor vehicles for transport, and as transport is now the #1 sector in terms of carbon emissions, it is necessary for transformative change to enable low-carbon transport choices. It is also worth noting that all the Merton commercial centres are highly polluted due to the presence of gyratory systems, which also make them unpleasant places for visitors and hostile for active travel. The introduction states we need to “think about people, places and placemaking”, as if this were an afterthought - an optional nice-to-have - to “growth” and “economic success”. MCC believes that “people, places and placemaking” need to be the primary objectives and that great place design leads to, and is a prerequisite for success. Economically-successful places need to start by being people-friendly. That is the way to attract businesses and customers, and to make Merton a great place to live and work. The Covid pandemic has been a timely reminder of how important green spaces and liveable streets are. It is likely that post-pandemic there will not be a complete return to “business-as-usual”, daily commuting instead being replaced by more regular working from home and with that change, there must be a focus on the importance of local neighbourhoods. Covid has also accelerated the shift to online shopping. Clearly for town centres to thrive, a change from the historic high-street retail business model is necessary, and they need to move to being attractive places to linger. Clearly, multi-lane gyratory systems, high traffic

volumes, high traffic noise, poor pedestrian environments and lack of green space do not encourage people to dwell for long.

There is a pressing need to promote active travel and particularly cycling. Merton's centres are generally hostile to cycling, and cycling connections between the centres and across the borough are sub-standard in many respects.

We note that in a number of places in the documents, terms such as "encourage" and "promote" cycling are used. We caution against such terms as the reality is that people want to cycle and are deterred and prevented from doing so by lack of safe, continuous, navigable and legible direct routes. The key is to "enable cycling through provision of a network of safe, continuous, navigable, legible direct routes". Indeed, *TN20 Borough-wide cycle facilities* (rather hidden in the Appendices) proposes such a network, and this should be given more prominence and weight in the document, as it helps give credibility to the various statements about cycling and set the context in which the ambitions can be achieved.

TN20 needs to be promoted to be a first-class policy in the Transport section.

We note "*The Mayor's aim for 2041 is for 80 per cent of Londoners' trips to be on foot, by cycle or by using public transport and for all Londoners to be able to undertake at least the 20 minutes of active travel each day*" and this cannot be achieved without a transformation of active travel infrastructure in the Borough.

All new cycle infrastructure needs to be designed up to standards including LTN1-20, London Cycling Design Standards and Manual for Streets 3. Existing infrastructure needs to be upgraded to these standards.

Comments on the individual documents are presented in the following sections, one per PDF document, with references to material in the documents in *italics*.

Good Growth Strategy

We welcome the commitment to "Prioritising walking, cycling and public transport". However the final sentence "*We want to continue to promote travel that is easy, safe, healthy and active that does not harm our local environment or contribute to climate change*" suggests no acknowledgement that high levels of motor traffic and lack of safe cycle routes is the biggest problem suppressing cycling. "Promotion" isn't necessary - but safe infrastructure is. Continuing existing policies that do not meaningfully allocate space away from motor traffic will not result in a modal shift to active travel.

"Providing the best start for young people "

It is worth noting that young people suffer most from a motor-centric transport policy. Young people are the least likely to be drivers, but most likely to be victims of road collisions. Young people can cycle - but are excluded from doing so by lack of safe infrastructure.

Furthermore, it is young people who will pay the price of our failure to tackle climate change - which means reducing carbon emissions from traffic. The latter cannot be done without reducing traffic levels.

"Good growth strategy"

“a need to use land more efficiently” - The least efficient way to use land is to use it to accommodate motor traffic. Cars are the least space-efficient mode of transport, and congestion (due to too many cars) makes bus journeys slower and less reliable. Cars spend 95% of their time parked, which takes up space that could be used to house people *“affordable homes”*, or provide an attractive street environment. The Plan needs to emphasise a move to a low-car economy to optimise land use, improve street environment and to tackle health inequalities, and most importantly, address climate change. *“Making the most of our limited land”*, *“Density”* - these paragraphs fail to mention the above-noted inefficiency of using land for parking and to accommodate traffic.

“20-minute neighbourhoods” -

We welcome the concept although we would recommend the more commonly used *“15 minute neighbourhood”*.

“seek to create 20 minutes neighbourhoods where it is feasible” seems to misunderstand the concept, which is to ensure people’s daily needs are nearby in their existing neighbourhoods, not to create a new entity of a *“20-minute neighbourhood”*. It is not a binary all-or-nothing concept, more a measure of how many amenities are accessible locally. It is a *“menu of policy actions that provide residents access to most, if not all, of their needs within a short walk or bike ride from their home”*¹. It is an *“organising principle for urban development and urban life”* and that is applicable everywhere. There is no reason why everyone in the borough should not benefit from these policies, and the worrying implication of the *“area-specific”* line of thinking is that those not in the favoured areas would be abandoned to live with poor local amenities and a lack of safe active travel routes. Exactly how should the policies be different in such areas ? We believe they should not be.

“Improve pedestrian and cycle movement and routes, making walking and ‘way-finding’ “ It is very important to make clear what is required, and that *“more of the same”* isn’t good enough. For cycling, the policy should be that infrastructure needs to comply with London Cycling Design Standards and LTN1-20. Either routes with low traffic volumes and speeds, or segregated lanes or off-road paths. Shared-use is to be avoided. Sealed surfaces should be used to enable year-round use; unsealed/gravel/hardpack surfaces need regular maintenance to avoid them becoming unusable in winter. Barriers must be avoided - they are not compliant with the Equality Act, discriminate against disabled users as well as non-standard cycles (cargo bikes etc.). An increase in the use of these will be crucial to achieving the climate change targets.

“Encourage travel behavioural changes by providing electric car charging points and cycle parking facilities.”

Important to note that the principal barrier to cycling is lack of continuous, subjectively-safe routes. Parking is necessary, but not sufficient. The Policy wording in this draft Local Plan should be strengthened to align with the London Plan 2020 guidelines for vehicle and cycle parking provision, in particular the guidelines that all residential, retail, hotel and leisure developments in PTAL 5 or 6 areas to be *“car free”*.

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<https://www.smarttransport.org.uk/insight-and-policy/latest-insight-and-policy/what-is-a-15-minute-neighbourhood>

South Wimbledon

No mention in this section of the fact that the South Wimbledon junction is one of London's most polluted locations.

Sites brought forward for development here should be required to contribute to the removal of the rat-run along Abbey Road, which currently endangers High Path residents, children attending the two schools (Harris Academy, Abbey Primary), and suppresses active travel. This will also open up opportunities for better public spaces and greening.

Morden

No mention of the pollution in this location, nor of the toxic effect of the gyratory system. Gyratories have no place in modern town centres.

"The provision of improved cycling facilities, particularly for visitors to the town centre."

Need to be clear: people need subjectively safe cycle routes to Morden. The area's geography means these need to pass through the surrounding residential areas, which will mean low-traffic routes need to be created, and a network of safe, segregated cycling routes between key hubs and town centres. Consultations on such routes need to focus on "how" not "if" - there can't be a veto on safe cycle routes because if there is, a major foundation of the climate emergency strategy will fail, and any professed commitment to reducing motor traffic is meaningless.

Raynes Park

Again no mention of the gyratory. Gyratories have no place in liveable town centres.

Good to see commitment to *"Improving walking and cycling between the town centre and surrounding streets separated by the railway bridge making the 20-minute neighbourhood accessible."* and *"An excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists"*. Development brought forward should improve the use of roadspace to improve the experience of cyclists and all those on wheels.

Mitcham

The current draft is deficient in making no mention of cycling or the desire to create a 20-minute neighbourhood in one of the areas of the borough with the lowest PTAL. Low PTAL makes providing safe walking and cycling routes as part of a comprehensive network even more important. Development brought forward in this area should actively contribute to achieving this. Poorer PTAL makes cycling as important as anywhere else in terms of shift from fossil-fuelled transport.

Wimbledon Chase

The current draft is deficient in making no mention of cycling. It should be amended to say how walking and cycling objectives will be brought forward in this area.

Wimbledon Village

"explore greener transport opportunities such as electric charging points and cycling parking facilities. " "Prioritise and promote walking and cycling to reduce pressure on car parking and improve accessibility."

We do not agree with this form of words. It implies that "exploring" is the extent of the ambition, and that the only purpose of active travel is to enable people to park their cars easily. The wording should be changed to acknowledge the need to minimize car use regardless of parking (not "exploring" it but actually doing it), and that acknowledges that

low-traffic and/or segregated cycle routes need to be created to enable the Village to be accessed by bike.

URBAN DEVELOPMENT OBJECTIVES & VISION PDF

Protecting and improving the borough's parks and ensuring public access to formerly private open spaces. Improving access to nature and leisure facilities, including opportunities for sport, physical activities, play and relaxation to help boost people's physical and mental health

Recommend this policy is re-worded to specifically refer to the need to permit cycling in green spaces and remove barriers that prevent non-standard cycles (cargo bikes, hand-cycles, etc.) from accessing parks and green spaces.

Strategic objective 3: tackling climate change

Recommend this also refers to the need to enable and require zero-carbon and low-carbon transport, and to reduce journey length and number of journeys for high-carbon modes, including freight consolidation.

Strategic objective 4: place plans and the 20-minute neighbourhood

a. Encouraging low carbon and healthy lifestyles in line with Merton's net zero carbon target by promoting walking and cycling.

The word "promoting" implies that only soft measures are needed to get people cycling. We know that people want to cycle and are prevented from doing so by poor-quality infrastructure. Suggest instead:

a. Encouraging low carbon and healthy lifestyles in line with Merton's net zero carbon target by enabling walking and cycling with a high-quality, subjectively safe network of routes to LTN1-20 standards.

e. Ensuring that development makes the most, efficient use of land and that is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport and access to amenities and services.

We support this.

Spatial Vision

Achieved a shift in travel behaviour towards more people walking and cycling, particularly for short journeys

Recommend to add:

Provided a subjectively-safe network of cycle routes to LTN1-20 standards

HEALTH & WELLBEING PDF

There are no references to the need to address road danger, which is one of the big causes of death and disability. We believe this omission should be corrected.

Strategic Policy HW2.1 Health and Wellbeing

g. Encourage more walking and cycling

The word “encourage” implies that only soft measures are needed to get people cycling. We know that people want to cycle and are prevented from doing so by poor-quality infrastructure. Suggest instead:

g. Enable more walking and cycling with a high-quality, subjectively safe network of routes to LTN1-20 standards.

i. Ensuring that neighbourhoods are, designed well, promote healthier and active living, and adopt active aging approaches. Streets and neighbourhoods are designed using Healthy Streets Approach to encourage active travel.

Note that chicane barriers make cycling difficult or impossible for people with disabilities and health conditions. To enable active travel for as many people as possible it should be policy that these should be removed.

Policy HW2.2: Delivering healthy places

This section has no reference to cycling, active travel, road danger or air quality, other than a passing reference to retail sales when places are made more attractive for walking. The Plan is deficient in this regard and this omission should be corrected.

Transport and urban mobility PDF

There seems to be no reference to “*TN20 Borough-wide cycle facilities. Development of a network of cycle strategic routes*” in this section. It needs to be listed as a specific policy.

“Our policy seeks to make Merton a healthier, cleaner and inclusive place by making it easier to move about in a safe environment, whilst supporting the Council’s climate change objective of becoming net-zero carbon by 2050.”

This policy needs to be clear about the need to promote active travel and reduce motor traffic.

“T6.5 Prioritising walking This policy aims to create a healthier borough by improving the walking environment and helping everyone to walk more as part of their daily lives.”

“T6.6 Prioritising cycling This policy aims to help people of all abilities to cycle, by encouraging the provision of better cycle facilities and infrastructure.”

What a contrast between “*improving the walking environment...helping everyone to walk more*” of T6.5 and “*encouraging the provision of better cycle facilities*” of T6.6. There is no

acknowledgement that cycling is as healthy as (and arguably healthier still than) walking. This sends the message that the Council cares about walking more than it does about cycling, and the use of the word “*encouraging the provision*” implies that it is somehow somebody else’s job to provide infrastructure. Furthermore, the wording “*help people....to cycle*” fails to recognize the fundamental reason that people do not cycle is fear of traffic. The need here is to reduce road danger, to reduce the speed, volume and dominance of motor traffic in minor roads, as well as providing specific cycle infrastructure on major routes where such a reduction is not possible.

Note also that disabled ppl are not considered in either policy. Not “*everyone*” can walk, and many disabled people use wheeled mobility aids, which need to be considered in both pavement and cycle infrastructure (e.g. removal of, and no new barriers that exclude non-standard cycles). Note further that barriers that exclude non-standard cycles contravene both LTN-1-20 and the Equality Act. Where control of speeds is actually necessary, other approaches are recommended by LTN1-20 and these should be incorporated into Merton’s policy.

“T6.7 Managing transport impacts

This policy seeks to ensure that the impacts of development on the transport network, environment and health are considered and appropriately mitigated, including during construction. “

Needs to refer to impacts on active travel. Too often pavements, active travel corridors and cycle routes are blocked or made more dangerous by badly-planned works, by diversions and one-way restrictions that fail to consider cycling and walking.

“T6.8 Parking, deliveries and servicing

This policy aims to manage the impacts of parking and servicing on nearby streets and the wider road network, to ensure that infrastructure is provided to support a shift to cleaner vehicles. “

This policy is rather unclear and we recommend clarification. What infrastructure is provided? The impacts of parking and servicing are, presumably, increases in traffic, dangerous manoeuvres, causing obstructions particularly to cycle infrastructure.

“Policy T6.5 Prioritising Walking To promote walking and enhance the walking environment, development will be expected to:

- a. Provide an age friendly, quality environment for people of all abilities.*
- b. Contribute towards the delivery of liveable and low car neighbourhoods through better walking connections.*
- c. Maximise opportunities to increase permeability and access to green and social spaces and other walking links”*

All of this applies equally to cycling, especially permeability. **The same points should be added to Policy T6.6.**

“Policy T6.6 Prioritising Cycling”

On cycle parking, it is expected that the number of cyclists will grow over time so the number of cycle parking spaces will need to grow at the same pace. Developers should be able to demonstrate that a site can accommodate this growth, and there should be a legal duty on sites to meet demand so that staff and visitors are not dissuaded from cycling in future by lack of secure cycle parking.

“d. Contribute to and support the delivery of a coherent network of cycle routes, hubs and parking facilities in the borough.”

Specifically, sites should be permeable and provide 24/7 access through for cycles. They should provide new connections where possible, and provide for future connections and through-routes; in other words, public rights of way should be enshrined so that connections can be made in future when neighbouring sites are redeveloped.

“e. For large non-residential sites developers should provide well designed, located and accessible facilities with showers, changing rooms and lockers to support cycling “

Not just large sites. Virtually any site with a staff toilet can provide at least a shower facility. Clearly the quality and number of facilities must be expected to scale with site size, and consideration needs to be given to the increase in cycling expected over time i.e. there will need to be more showers etc. provided in future, which could be provided by repurposing car parking space or in other ways.

“This can be delivered by upgrading existing cycle facilities and providing new safe, legible, continuous and well-connected cycling routes to places where people wish to travel.”

Add “direct, unobstructed, clean and well-maintained”, as sadly many cycle facilities in Merton do not meet these standards.

“Opportunity should also be taken to open-up new connections or improve the quality of existing connections to and between open spaces and other public and permissible rights of way.”

Change to “to, between and across open spaces” as open spaces provide important route choices, and add “create new rights of way”.

“the council may seek a financial contribution based on the shortfall in cycle parking towards the inclusive cost of providing an alternative facility, such as secure on-street cycle hangers together with annual membership costs for a minimum period of 3 years.”

Why only 3 years? The facility should be provided in perpetuity, in the same way as an on-site facility would be. Otherwise there is a perverse incentive created for developers to offload costs onto residents.

“Mobility services”

This section really needs re-drafting. It needs to make clear what mobility services it is referring to (given this section is cycling, it should likely be restricted to just bike hire/sharing and possibly electric scooters), and make distinctions between different mobility services. For example, cycle hire is clearly zero-carbon and healthy. Electric scooters (likely soon to be legal) are fairly low-carbon, but offer no direct health benefit. “Car clubs” (mentioned in a later policy) can reduce car ownership and indirectly increase active travel by stopping car

travel from being the default travel mode, as it often tends to be for car owners. Car clubs can be further divided into pure-electric (EV) and fossil-fuelled cars.

Policy T6.7 Managing Transport Impacts

“a. Development should be safe, minimise impacts on the transport network, environment and health. Proposals should promote increased walking and cycling, sustainable transport and deliver equal access for disabled people.”

Proposals should reduce motor vehicle movements, car ownership, car parking and car use. There should be a presumption in favour of repurposing of existing car parking, and avoiding providing new car parking.

“b. In areas of good PTAL (levels 5 & 6) there should be a presumption in favour of permit free development.”

Permit-free meaning no new parking permits. There needs to be a policy that disincentivizes car ownership and use and promotes active travel and public transport use. Where possible parking should not be provided, or restricted, for example zero resident parking, except to make provision for those with disabilities. Parking that is provided must be charged for, and those who adopt a car-free lifestyle should not be subsidizing car owners. There should be a workplace parking levy charged to the beneficiary. There should be no free parking. “Free” parking effectively means that non-car users are subsidizing car users, as well as suffering the externalities.

This policy needs to acknowledge the role cycling plays in “last mile” journeys between public transport hubs and homes, places of work and other destinations, and promote this.

“Policy T6.9 Supporting Transport infrastructure”

“This policy safeguards land currently occupied by transport uses and seeks additional land or physical improvements where this is required to improve the transport network. This will be secured through planning obligation.”

The policy needs to specifically refer to the need to improve permeability for walking/cycling, by creating new safe and pleasant walking and cycling routes without barriers, through sites, ensuring 24/7 access. For example, the new development on the old Raynes Park Dundonald Church Site could have connected Abbot Avenue to Kingston Road, and this was a missed opportunity to create a useful, safe and direct connection.

“Improving accessibility by walking, cycling and public transport is a key objective of the council’s transport policies, in particular between town centres and where physical barriers result in poor access, such as in Lower Downs Road, Raynes Park, where a key walking route with a new shared facility is sought alongside the existing road. Other initiatives include developing a series of town centre based cycle hubs (Morden, Colliers Wood and Wimbledon) and expanding the strategic cycle route network. More detail can be found within the Council Local Implementation Plan. “

A key point here is that accessibility is not just about physical barriers and access. It is equally about traffic volumes and speeds, and the fact that dominance of motor traffic is the principal reason people don’t cycle, as reported by the annual Travel Attitudes Survey. Initiatives must include creation of low-traffic neighbourhoods. This is essential both to reduce motor traffic in pursuit of carbon reduction, and to promote cycling.

The LIP really needs re-drafting in the light of the Climate Emergency declaration. It is nowhere near ambitious enough in terms of creating a safe cycle route network to meet the requirements of decarbonization as set out in the Climate Action Plan and the Paris Agreement. In particular, it needs to be more ambitious in terms of the creation of low-traffic neighbourhoods.

For Lower Downs Road, the existing situation is very unsatisfactory. The bridge is the most-struck bridge in the UK this year. There is too much traffic, and repeated bridge strikes cause disruption. It is unclear how a “shared facility” would work, as cyclists would presumably need to cross a lane of traffic to join and leave it. Additionally, the cost would be prohibitive, therefore we do not regard this as a realistic proposal. The proposal is not only very expensive, it also does not address the problem of the bridge height and width being completely unsuitable for current traffic levels, or the problems of a lack of a safe crossing for cyclists on the railside path, or the gradient of the approach from that path. But the situation does need addressing. It would be better to close Lower Downs Road to through traffic and make it an active-travel route. This solution is better-aligned with the Climate Action Plan, and is financially-sustainable.

Proposed Cycling Measures map PDF

While the measures proposed herein are generally welcome, they do not represent a programme sufficient to meet *TN20 Borough-wide cycle facilities. Development of a network of cycle strategic routes*. A strategic network covering the whole borough to LTN1-20/LCDS/MfS3 standards needs to be designed. Looking through the items, many are tasks to “investigate” improvements, so this is not yet a plan for delivery of schemes that contribute to a network within a defined period of time. Also there are large areas which would not be within 400m of the cycle network as set out in London policy.

We would like to see a commitment - as a specific item in the Local Plan- to design and implement a strategic network to the previously-mentioned standards, to a good density, with input from Merton Cycling Campaign. Such a network need not be expensive - we have seen with the Covid Streetspace measures that a lot can be done with minimal expenditure - but it does need commitment, and an acknowledgement that cars cannot continue to dominate residential areas to the exclusion of active travel.

Climate Change PDF

There is no reference to transport-related policies.

CC8.10

This policy needs to have a requirement relating to minimizing motor vehicle journeys and maximizing and enabling journeys by active travel. (this is noted in the justification (1.1.7.) but not in the policy itself.

Colliers Wood PDF

Promote active travel

Recommend “enable” rather than “promote”, as the latter implies “soft” measures rather than the infrastructure needed and rightly proposed here.

g. Supporting development which helps to optimise housing potential and quality, traffic flow and the public realm;

Recommend “motor traffic reduction and congestion reduction” rather than “*traffic flow*”.

It is worth noting that Colliers Wood has a number of low-traffic neighbourhoods which puts it in a great position to enable active travel. However chicane barriers create obstacles for disabled users, and should be removed.

Morden PDF

create healthier streets with better connectivity and permeability for pedestrians and cyclists; reduce traffic dominance, improve walking, cycling and vehicle links into and around the town centre;

Support this. Solutions should be to LTN1-20/LCDS/MfS3 standards.

“undermined by the intrusive road layout, busy traffic and visual dominance of buses.”

We welcome the recognition of the current problems caused by traffic in Morden. Addressing these issues will need to manage down traffic levels while avoiding increasing rat-running through Merton Park, Cannon Hill and other surrounding neighbourhoods. We recommend a low-traffic neighbourhood approach in these areas, which will also create the cycle routes and “healthier streets” referred to earlier and required by 3.3.21 “*80 per cent of Londoners’ trips to be on foot, by cycle or by using public transport and for all Londoners to be able to undertake at least the 20 minutes of active travel each day*”.

3.3.27. Urban layouts should be based on a permeable and easily navigable network of recognisable streets, routes and spaces that link in seamlessly with surrounding development and facilitate walking, cycling ...”

Note that permeability is necessary but not sufficient, and this section should note that low traffic volumes and speeds are necessary to enable cycling, therefore filtered permeability should be used to create low-traffic streets and neighbourhoods.

Mitcham PDF

Mitcham Town Centre

The policies make quite clear that there is a great need to make Mitcham Town centre easier to get to by walking and cycling. What is assumed in the local plan is that development sites will provide the means to enable this. But, as the Wimbledon Town Centre report suggested,

developers need the accessibility to cycling and walking networks to attract the most promising investment to the site. The opportunity that Merton Cycling Campaign recommended Merton Council take was to improve connections under the 'Rediscover Mitcham' initiative. This did not happen.

Merton Cycling Campaign recommend that in the local plan the Council should commit to a mapped-out Active Travel Access Management Strategy for Mitcham Town Centre which highlights where interventions will be necessary in terms of Highway Crossings, Highway Space, Public Rights of Way adaption, Tram/Train Station Access etc, so that continuous coherent connections can be shown to be in the pipeline. This is in conjunction with the Cycle Network plan.

At its most simple, two-stage pedestrian crossings over a road like Holborn Way can't be justified when a road like Marylebone Road in central London does not necessarily have them.

Surrounding Neighbourhoods

To enhance the prospects of attracting promising development a mapped-out Active Travel Access Management Strategy should also apply to the proposed linkage of the green spaces along the Wandle Trail, between Morden Hall Park, Ravensbury Park, London Road Playing Fields, Cricket Green, The Canons, Mitcham Common through to Rowan Park and Pollards Hill. (As Clause 1.2.15 P.12 Ch.5).

In terms of Public Transport, when a tram stop like Beddington Lane is just outside the Borough Boundary its influence should not be ignored. Proposals for enabling Active Travel Access from Pollards Hill should certainly be mapped out in this Local Plan as should the full extent of Commonsides East to Pollards Hill.

Raynes Park PDF

"new businesses can benefit from the proximity to the strategic road network."

This sounds rather like promoting more driving, which runs counter to climate change, active travel and 20-minute neighbourhood objectives. [We note the caveat "*not generate significant private car trips*" later, but this is a little weak.]

"e. Securing well-designed and well linked improvements for pedestrians and cyclists and improved access to public transport facilities, ..."

We recommend setting the scene here. Raynes Park has some reasonable cycling connections including the Coombe Road track, the New Malden CS31 route and railside path to Wimbledon. But the town center is extremely hostile for cycling, with the gyratory system, poorly-designed, narrow and obstructed shared-use paths, "dismount" signs and the extremely dangerous crossing at the railway bridge. A proper solution to allow cycling through the centre is needed to LTN1-20/LCDS/MfS3 standards.

"We will seek to provide well-designed parking for delivery bikes and scooters"

An objective here should be to move away from petrol P2Ws to zero-carbon bikes. Parking that takes street space that could be used for better cycle routes is not acceptable.

South Wimbledon PDF

3.5.8. People are more likely to use local shops and services if they are in an attractive setting, if the walking or cycling route to reach them looks good and feels safe

Great to see this acknowledgement, and this para belongs in all the other neighbourhood plans.

High Path : This estate is already nearly a low-traffic neighbourhood with a number of closed/restricted junctions. An opportunity here is to complete the low-traffic neighbourhood by removing the busy rat-run along Abbey Road, which endangers High Path residents, children attending the two schools (Harris Academy, Abbey Primary), and suppresses active travel. This can be done now at low cost (no need to wait for estate regeneration) and will also open up opportunities for better public spaces and greening.

Wimbledon PDF

Objectives: improving connections for active travel is needed as an objective. Currently town centre access is hampered by severance due to railway lines, by a lack of cycle routes and by the toxic effect of the gyratory.

Also notably absent is acknowledgement of the issues of congestion and pollution, which make the town centre unpleasant and difficult to access by bus. Bus journeys in particular are very slow and cycling is not a pleasant experience.

The gyratory really needs to be removed. The town centre cannot function as both a through-route for excessive volumes of motor traffic, and an attractive destination where people want to linger. The presence of heavy traffic will deter people from walking and cycling as their first preference.

p. Supporting proposals to improve walking and cycling between the neighbourhoods of South Wimbledon, Colliers Wood, Wimbledon, Wimbledon Village, Raynes Park, Wimbledon Chase and outside the borough to Tooting, Southfields and Kingston.

We fully support this. It would be good to link this to the *TN20 Borough-wide cycle facilities*.

q. Recognise the importance of Wimbledon Tennis Championships,

While the importance of the Tennis is clear, we note it is accompanied by a large increase in motor traffic, particularly the event's own fleet. The event should be encouraged to manage down its motor vehicle use and reduce its carbon footprint.

Appendices PDF

TN1 - Sustainable Transport Corridor

We strongly support the concept. It should be more explicitly referenced elsewhere and the Policy should make clear how this will be supported and brought forward.

TN14 - Wimbledon Town Centre public realm improvements

We support this. We prefer removal of the gyratory system, however another solution that achieves subjectively-safe cycle routes to LTN1-20/LCDS standards would be acceptable.

TN15 - Morden Town Centre, London Road

We support this but would prefer removal of the gyratory system, The solution must deliver subjectively-safe cycle routes to LTN1-20/LCDS standards.

TN16 Durnsford Road between Arthur Road and Plough Lane

We support action on this dangerous road. Solutions must be LTN1-20/LCDS compliant.

TN18, TN19

We support action. Solutions must be LTN1-20/LCDS compliant, and need to be part of a continuous, coherent, connected network of cycle routes.

TN20 Borough-wide cycle facilities.

Development of a network of cycle strategic routes, including new feeder routes to the Cycle Superhighway. Upgrades of existing facilities and New cycle hubs at Wimbledon, Colliers Wood and Morden

This is an excellent initiative that should be incorporated into the draft Policy as it is currently only referenced in the appendix and is essential to achieving Merton's active travel ambitions. The network needs to be LTN1-20/LCDS compliant and can consist of low-traffic (low volume, low speed) routes in residential areas, segregated facilities on busier roads, and off-road paths. The network should be fully-accessible for all abilities. The network needs to be dense enough that all residents are within easy reach of it along safe roads (which will be achieved if the network is implemented including low-traffic neighbourhoods), and it serves all major destinations.

TN21 - see comments elsewhere on Lower Downs Road

TN22, TN23, TN24, TN25 - we support, solutions need to be LTN1-20/LCDS compliant, and need to be part of a continuous, coherent, connected network of cycle routes.