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Dear Paul,

Merton Residents' Transport Group (MRTG) response to Merton Local Plan Consultation 2a

Introduction to MRTG

Merton Residents' Transport Group (MRTG) was initially established to support the development of emergency transport measures in Merton in response to the need for increased space for cycling and walking as a result of COVID-19. It is a nonpartisan organisation whose members comprise local residents, community organisations, and transport professionals.

The Group decided in October 2020 to extend its work until at least April 2021, both to support the consultation on COVID-19 measures, as well as to contribute to the longer term thinking about active travel in Merton.

The Group's priority goals are to establish:

- Low Traffic Neighbourhood in every community where this is appropriate
- A joined-up network of safe, direct walking and cycling routes
- Traffic-free school streets at school run hours
- Pedestrian Friendly high streets to boost local business
- 20mph speed limit as default (already implemented but further enforcement / education required)

This letter sets out our response to Merton's Stage 2a Draft Local Plan, commenting solely on portions of the Draft Local Plan that are related to our Group's priority goals.

Key comments to consultation

We appreciate the effort taken by officers to conduct this consultation despite the challenges presented by COVID-19. We have outlined detailed comments in the below appendices, however the key themes to our comments are as follows:

Set clear ambitions for 2030: The Local Plan is expected to have a lifespan of 10+ years; the plan as currently written feels near-term and "present-forward", rather than envisioning the needs of the borough and its residents in 2030 and what needs to be done over the next ten years in order to achieve this. In particular, the Local Plan lacks detail on how Merton will create people-friendly neighbourhoods, and reduce reliance on motor vehicles, both of which are essential to tackle the climate emergency.

Most of Merton's roads are currently designed for and dominated by motor traffic. **Overall the document seems to skirt around the need to reduce motor traffic to make Merton more pleasant - to create a borough people want to live, work, shop, eat out, spend time and visit.** Streets make up around 80% of public space in urban areas; given their extent, the way they are designed has a profound impact.

Good low traffic road design can enhance the quality of people's lives, reconnect communities and make an area more desirable to live in.

Define strategic active travel network: Increasing levels of cycling and walking is essential if we are to tackle the climate emergency. We support the Local Plan's recognition of the health benefits of active travel, ambitions to support and promote active travel, and prioritisation of pedestrians and people cycling within the public realm. However the Local Plan does not set out a sufficiently clear ambition for a strategic walking and cycle network; whilst we support many of the initiatives described within the plan, in aggregate they only set out a near-term vision and do not provide a long-term ambition to be delivered over the duration of the plan. Merton needs to develop a clear vision of the integrated network it will build across the borough, so that it can grow the number of residents who live within close proximity to cycle infrastructure, and so that residents have a large number of journey opportunities provided by that infrastructure. **The appendices that follow include a proposal for a strategic, integrated cycle network**, and we have provided detailed commentary on the specific initiatives included within the Local Plan documentation.

Build quality cycle and walking infrastructure: The Local Plan does not make clear what "good" looks like. Future cycle and pedestrian infrastructure delivered either by developers or by Merton needs to meet relevant DfT standards, most notably LTN 1/20 and Manual for Streets 3 (expected January 2022). Specifically:

- Shared use paths should be avoided as these create conflict between pedestrians and people cycling, creating suboptimal experience, and in particular create difficulties for those who are visually impaired; where shared use paths are unavoidable, they should meet DfT guidelines on minimum width (3m for low-use, 4.5m for high-use)
- Gravel surfaces should be avoided, with smooth all-weather surfaces used instead, enabling year round usage and improving accessibility
- "Chicanes" or other barriers should not be used and should be removed from existing locations within the borough, as these impede accessibility
- Design of cycle routes should ensure that they offer a direct route, and there is no / limited time penalty in using the cycle route vs cycling in the carriageway, to ensure adoption; common 'time penalties' encountered include having to yield at each side road, having to cross the carriageway to use a short stretch of bi-directional track, or having to dismount

Ensure developments deliver on active travel: We welcome the inclusion of requirements for cycle storage and facilities within new development, however the current draft of the Local Plan does not fully reflect London Plan 2020 guidelines for vehicle and cycle parking provision; notably London Plan guidelines for vehicle parking should be considered absolute maximums, with all residential, retail, hotel and leisure developments in PTAL 5 or 6 areas to be "car free". We additionally welcome opportunities identified to use redevelopment of sites to improve permeability of major sites; specific comments on how these could be further enhanced are outlined in the detailed appendix.

We have set out our detailed response to the consultation in the below appendices. We are happy to discuss any of these points with officers as appropriate.

Yours faithfully,

Merton Residents' Transport Group

Appendix One: Detailed comments to consultation

Document	Comments
Good Growth Strategy	<p>We support the Good Growth Strategy's high level aims; however believe that it needs to:</p> <ul style="list-style-type: none"> - Emphasise more clearly the need to disincentivise car ownership and reduce the number of motor vehicles on Merton's roads - Emphasise that for a shift towards walking and cycling to take place, it is not just "encouragement" needed, but the construction of physical infrastructure that make these options safer and more appealing; this can particularly be enabled by an integrated cycle network across the borough - Adopt the 'standard' 15 minute neighbourhood taxonomy, as opposed to the "20 minute" neighbourhoods used <p>This strategy needs to be backed up by detailed proposals; we have provided further perspectives on this in the relevant sections of the consultation response.</p>
Urban Development Objectives and Vision	<p>In line with our comments on the "Good Growth Strategy" above, these objectives and vision need to:</p> <ul style="list-style-type: none"> - Emphasise more clearly the need to disincentivise car ownership and reduce the number of motor vehicles on Merton's roads - Emphasise that for a shift towards walking and cycling to take place, it is not just "encouragement" needed, but the construction of physical infrastructure that make these options safer and more appealing - Adopt the 'standard' 15 minute neighbourhood taxonomy, as opposed to the "20 minute" neighbourhoods used - Specifically list "deliver and integrated cycle network" as an objective by 2036
Colliers Wood	<p>To achieve the stated aim of helping to make Colliers Wood easier to navigate for pedestrians and people cycling and also support and promote active travel:</p> <p>Policy N3.1b should read "... making the environment more attractive to own centre users, especially pedestrians and people cycling;"</p> <p>Policy N3.1 g or h should explicitly mention that for development to be supported it must support the development of a coherent cycling network in Colliers Wood that is connected to the Borough-wide network.</p> <p>N3.1g "Improving traffic flow" should not be a rationale to support development, as this may induce demand for journeys by private vehicle and consequently overall network demand; development should additionally be supported where it improves connectivity by foot / cycle and where the borough's foot / cycle network is improved</p> <p>No linkage is made to the Transport strategy or maps and how the proposals contained within these will be managed or supported within Colliers Wood, which include:</p>

	<ul style="list-style-type: none"> ● The Proposed Sutton Tramlink route Option 2 Colliers Wood to Sutton ● The 'Sustainable Transport Corridor' from Colliers Wood to Mitcham' shown on the 'Walking and Cycling Map for Colliers Wood' ● A 'Cycle Hub' (and how that will connect to the Wimbledon Cycle Hub) <p>Specific feedback on site allocations:</p> <p>CW1: No specific comments.</p> <p>CW2: CW2 (Britannia Point south) should be required to connect to CW5 (Priory Retail Park) and each other coherently through a joined up approach to public realm and walking and cycling provision.</p> <p>CW3: No specific comments.</p> <p>CW4: No specific comments.</p> <p>CW5: CW5 (Priory Retail Park) and CW2 (Britannia Point south) should be required to connect to and each other coherently through a joined up approach to public realm and walking and cycling provision.</p> <p>A general comment on Colliers Wood PTAL and Site Allocations: Colliers Wood is described as having 'excellent' PTAL in para 3.1.3, but there is then inconsistency in the scoring and descriptions within the site allocations:</p> <ul style="list-style-type: none"> ● CW1 - has PTAL of 6a Excellent (Across the road from the tube) ● CW2 (Britannia Point) - PTAL of 5 'very good' ● CW3 community centre - PTAL of '5' but is described as only 'good' ● CW4 (station and parade) - PTAL of 5 and 'very good', although it seems questionable that a site containing the tube station has a lower PTAL than CW1 ● CW5 (Priory retail park) - PTAL of 5 and 'very good'
<p>Mitcham</p>	<p>Policy N3.2c and N3.2l provide weak guidance on active travel routes. These need to be significantly strengthened. Specifically, they do not cover the need for a network of pedestrian and cycle routes as opposed to isolated improvements. The goal of a network needs to be clearly expressed in the final version of the Local Plan.</p> <p>Specific feedback on site allocations:</p> <p>Mi1: This is a major site and guidance must be clear that a full masterplan is needed. This should cover how active travel is to be encouraged at the site. The initial planning application 19/P2383 suggested active travel routes on the edge of the site, which may not be the best choice for safety or encouraging use. The guidance must be specific on the need for through active travel routes to access Church Path, Hallowfield Way, White Bridge Avenue, the tram stop and Morden Road. We would also expect any masterplan to include a plan to provide a thorough pedestrian and cycle route to London Road. Given that the site will form an effective LTN (Low Traffic Neighbourhood), the roads should be designed with the principle that "cars are guests".</p> <p>Mi2: We welcome the guidance to enhance pedestrian and cycle links within the site and towards Canons House. The guidance with respect to the existing</p>

Cold Blows public footpath should be changed to require the footpath to be enhanced, not just preserved. There is potential to offer a quietway route to Mitcham Town Centre and across to Canons House if the development is planned with care.

Mi3: Development of this site must be performed with great sensitivity. Previous road junction changes have favoured the car at the expense of a pleasant environment for customers of the Burn Bullock. Guidance should be added that any development must also contribute to the safety and enhancement of the road junction including the provision of segregated cycle lanes and larger pavements. This is probably best achieved via a no right turn restriction from London Road to Cricket Green A239 and the removal of the left turn filter on Cricket Green.

Mi4: Planning permission has been granted. It is regrettable that it appears that no consideration was given to enhancing cycle usage along the neighbouring footpath.

Mi5: Planning permission has been granted.

Mi6: Guidance should be given with respect to active travel given this is a pinch point on London Road. Potentially land from this site could be used for a dedicated cycle lane.

Mi7: *[Note: The address of the site and the description is incorrect.]*

Mi8: Redeveloping this major part of Mitcham town centre would be a major undertaking but could be very positive. Despite the policies in the Local Plan, the guidance has no mention of active travel or cycling. We would suggest that this site offers the potential to reroute St Mark's Road, creating a simpler road network with more traffic-free streets, and allowing residential development adjacent to the school. In particular, St Mark's Road between Majestic Way and Chalkey Close should close, greatly enhancing the safety of school children. Any development should also include a cycle parking hub, including 5% provision for non-standard bicycles.

Mi9: No specific comments.

Mi10: No specific comments.

Mi11: Planning permission has been granted. It is regrettable that it appears that guidance in the draft London Plan was not followed. Road access to the accessible flats is from Raleigh Gardens instead of the suggestion to use the service road in the draft plan. No consideration appears to have been made of converting Raleigh Gardens into a two-way road, despite being mentioned in the draft Local Plan.

Mi12: Given the location of this site, it is disappointing to see no guidance with respect to active travel. Guidance should require that development of the site includes at least a pedestrian route to Sadler Close.

Mi13: As per site Mi8, this site can contribute towards the pedestrianisation of the section of St Marks Road between Majestic Way and Chalkey Close.

Mi14: Any enabling development must be legally watertight, addressing issues

	<p>that arose on a similar proposal for the LESSA site in West Barnes. This site is not far from Rowan Park estate, and guidance should be added to create a pedestrian and cycle route between them. Nearby residents in the Rowan Park estate had originally been informed by developers that they would be able to walk via the cemetery to Mitcham Eastfields station, something that has not come to pass. This site offers the opportunity to complete that plan.</p> <p>Mi15: No specific comments.</p> <p>Mi16: This important site should have explicit guidance with respect to active travel. The previous development on the south west side had reasonable access for pedestrians, but no specific connections for people cycling. Given the specific policies N3.2c and N3.2l, this site is critical to providing those connections from this area of Mitcham and beyond. The guidance should mandate high quality pedestrian and cycle routes linking to Miles Road and Portland Road. These could access Mitcham town centre via Westfield Road and Raleigh Gardens, or via Sadler Close and site Mi12.</p> <p>Mi17: Our comments with respect to the junction in site Mi3 also apply here. Narrowing the road to one lane in each direction, and building out segregated cycle lanes would provide a much more pleasant street environment, which in particular may help to make the White Hart and the Burn Bullock pubs more commercially viable.</p> <p>Mi18: Given the location of this site, many users of healthcare will be tempted to drive rather than walk or cycle. It is therefore important that any development is welcoming to active travel, especially with respect to cycle parking provision.</p>
<p>Morden</p>	<p>We welcome the intention to ‘prioritise pedestrian and cyclists in regeneration of public spaces’ in the overall objective, along with the recognition (at 3.3.24) of the current ‘poor experience for pedestrians and cyclists’ and of the need for (3.3.27) ‘permeable and easily navigable network of recognisable streets, routes and spaces that link in seamlessly with surrounding development and facilitate walking, cycling and use of public transport’. We feel that more needs to be done in the plan to address these issues including improving the quality of existing infrastructure, joining up missing links and mandating that active travel is put at the forefront of the development of specific sites.</p> <p>Outside the Morden Regeneration Zone, the Local Plan provides little detail on surrounding neighbourhoods, including the large areas of Cannon Hill, Lower Morden, Merton Park and St Helier wards. This is not acceptable. The absence of any specific policy covering areas outside the regeneration zone has the potential to be hugely negative for the area over the next 10 years. At a minimum, the Morden Local Plan should include a policy stating the ambition for a network of active travel routes in the Morden area. As with other neighbourhoods, more specificity is required.</p> <p>Specific feedback on site allocations:</p> <p>Mo1: Development of this site on the boundaries proposed would create a significant dead-end area only accessible by Canterbury Road, which would lengthen pedestrian and cycle journeys to local shops and facilities, exacerbating car-dependency. The local plan should mandate that development should only continue if pedestrian and cycle access can be provided to Furness Road. This site is the key missing link that blocks a</p>

potential continuous pedestrian and cycle route from Netley Gardens towards Middleton Road and on to Central Road, Morden town centre and Morden College.

Mo2: Planning Permission was granted for the site recently. We are pleased to see cycle parking was provided. However, it is disappointing to see no indication of local road improvements to provide a safe pedestrian and cycle crossing of Farm Road at the entrance to the recreation ground. This is a missed opportunity as there is potential for a quiet active travel route through Morden Recreation Ground and the sports ground from Middleton Road to Canterbury Road.

Mo3: Planning Permission was granted for the site recently. We are pleased to see cycle parking was provided, although potentially too much is outdoor rather than indoor. We believe there is potential to provide segregated cycling facilities using section 106 money on the adjacent main road. Any enabling development must be legally watertight, addressing issues that arose on a similar proposal for the LESSA site in West Barnes.

Mo4: It is imperative that this scheme lives up to the ambitions stated in the earlier sections (see above) to improve pedestrian and cycle access, including:

- Mandating that greenway access is included roughly following the Northern line tracks to improve permeability for pedestrians and people cycling from the north
- Improving connectivity to cycle routes to Raynes Park, via links to Martin Way
- Improving accessibility for pedestrians and people cycling to Morden Hall Park
- A clear plan for pedestrian and segregated cycle routes across the whole site, potentially making better use of the footpath just west of the Northern line at 2 Crown Lane
- Improving links to A24 cycle lanes (north and southbound)

Development of residential or commercial premises on this site should include minimal car parking spaces and compulsory bike storage, particularly given the high PTAL rating and improved connectivity to cycling routes.

Development around Morden station should include “cycle hub”, providing high quality cycle storage for both rail passengers and local shoppers, as well as advice on local cycling, bike servicing and sales of bikes/accessories

Mo5: Development of this site must incorporate changes to improve pedestrian and cyclist access to A24 northbound (including for cycling for connections to Wimbledon) and Morden Hall Park (through upgraded crossing facilities). Specifically there is potential for a quiet pedestrian and cycle route running East/West through this site parallel to Kenley Gardens. Such a route would connect to the north end of the Mo4 site and Kendor Gardens via two currently private service roads next to 1 and 2 Daybrook Road. Strong consideration should be given to including this directly within the Morden Regeneration Zone to ensure that the road space at the front of this site is developed appropriately in order to generate more funding to complete the active travel route.

Mo6: Priority should be given to exploring how development of this site can improve connectivity between the cycling provision on the A24 heading north and south from Morden. Specifically, it would be highly desirable to create a

	<p>new pedestrian and cycle link across the railway to Bordesley Road, perhaps to between 30 and 32 Bordesley Road or via Birchwood Road. Linking the new bridge to the Lidl access road would also be possible. If designed carefully, such a route might offer the potential to close and demolish the existing intimidating long footbridge across the depot which constrains the development of the depot and offers no cycling facilities.</p> <p>Mo7: It would be possible to provide a quiet active travel route through the site to Arras Avenue via the existing private service road, however the benefits of such a link are lower than at other sites.</p>
<p>Raynes Park</p>	<p>We support the policy objectives to improve active travel, however do not believe that there is adequate specificity on measures that are required. There needs to be a clear masterplan for the area showing proposed infrastructure (e.g. pedestrian / cycle / vehicle access), with development of a strategic walking and cycling network. Particular focus needs to be given to the pedestrian and cycle infrastructure required to form a cohesive network as part of the Shannon Corner redevelopments. Specific actions that would help Merton to deliver on this policy objective include:</p> <ul style="list-style-type: none"> ● Closing the “missing link” in Merton’s cycle in infrastructure through Raynes Park town centre, with clear segregated route connecting Coombe Lane and West Barnes Lane to Kingston Road, Wkye Road (for LCN 208) and Lambton Road / Pepys Road (for destinations north) ● Removing Raynes Park gyratory to return to two-way traffic with a protected cycle route each side ● Reallocating car parking space to soft landscaping, restaurant seating and cycle parking ● Introducing pedestrian crossing at blind bend on Raynes Park Bridge Road ● Developing new segregated on-road cycle routes, including West Barnes Lane, Kingston Road, Crossway and Worple Road ● Reducing pedestrian waiting time for those crossing Coombe Lane on foot near Durham Road ● stop on the southern side of Coombe Lane ● Adding Zebra or Signalled crossings to in residential areas to improve connectivity, including: <ul style="list-style-type: none"> ○ Cannon Hill Lane near junctions with Cherrywood Lane and Eastway ○ Coombe Lane at junction of Cambridge Road (parallel crossing to allow safe access from Cambridge Rd to the existing two-way cycle track and bus stop) ○ Durham Rd - to north, in middle point (near Cambridge Rd) and to the south near Coombe Lane. ○ Copse Hill to connect to Barham Road, Drax Avenue and Ernle Roads. ○ Grand Drive, multiple possible locations ○ Crossway between Westway and West Barnes Lane ○ West Barnes Lane near Arthur Road, and near Linkway ● Completion of the New Malden cycleway to West Barnes Lane, and a link north to Coombe Lane via the playing fields and public footpath. ● Development of segregated cycle infrastructure connecting Shannon Corner shops (e.g. Bodnant Gardens > Beverley Way > Burlington Road)

- Development of greenway/quietway cycle infrastructure via Prince George's Avenue, across Prince George's Field, beside Raynes Park Vale football club, skirting Cannon Hill Common to join the end of Heath Drive where the route would split one to link to the lane on Meadowview Road and one to reach Cannon Hill Lane. A modal filter on Heath Drive would help protect this route.
- Development of greenway cycle infrastructure along the route of an old public footpath, from running from Cannon Hill Lane, across the south side of the AELTC field to Grand Drive, then beside the school, over Pyl Brook, across the playing fields to Arthur Road and across unused land to Marina Avenue. When the BBC site in Sutton is developed this route would be continued on a bridge across the railway.
- Development of greenway cycle infrastructure along Pyl Brook from Lower Morden Lane to Kingsway utilising an existing bridge near Derwent Road.
- Investigate greenway cycle infrastructure to New Malden south of the main railway line via Beverley Park.
- Implementing active travel neighbourhoods in proximity to town centres in Raynes Park, Motspur Park, and Wimbledon Chase, to improve attractiveness and safety of walking / cycling to visit local businesses

In addition, we would request policy N3.4.c is amended; the suggested provision for take away scooters outside restaurants caters for current customer behaviour during the pandemic, but makes for an unattractive shop front, especially compared to alternative uses, such as outside dining. Any solutions need to cater for both uses, and accommodate the growth of cargo bikes.

In the event that Crossrail 2 is to proceed, future station designs should incorporate step-free access, ample cycle parking (“cycle hubs”), connected to existing / new segregated cycle networks, and where the opportunity presents itself, creation of additional public space / ‘town square’ (e.g. Raynes Park)

Specific feedback on site allocations:

RP1: Any proposed usage of this site should seek to discourage use of motor vehicles (i.e. car-free development), reflecting the high PTAL score of 5. We emphasise the importance of enhancing the public footpath next to the site, and note that it is unsigned at the Durham Road end.

In addition to support active travel to this site:

- A cycle contraflow should be introduced at the one-way segment to the south end of Amity Grove
- A side road zebra crossing or continuous footway should be introduced at the south end of Amity Grove
- A zebra crossing should be introduced at the northern end of Amity Grove to enable pedestrians to cross Durham Rd

RP2: We welcome the guidance that developments must improve the public realm including pedestrian safety, however this should specifically include significant amelioration of the public right of way to the rear of the site. The existing public footpath is very run-down, feels unsafe to walk and was blocked by fly-tipping the last time the author attempted to use it.

There is potential to develop a north south active travel route across the RP2

site towards the RP3 site, existing footpath and Tesco, providing a more direct route to shops and education. Guidance should require that site RP2 and RP3 are developed under a masterplan to avoid missed opportunities from piecemeal development.

RP3: Guidance should explicitly require the northern boundary of the site (Pyl Brook) to be opened up as a greenway, for pedestrian and cycle traffic. Any redevelopment should include clear provision for cycle access to and parking at the superstore, enhance and integrate with north/south cycle routes along West Barnes Lane and Beverly Way. Opportunities to link the greenway route via a ramped bridge to the east side of the railway line should be explored, to provide an accessible route for both pedestrians and cycles, to reduce the barrier presented by the railway line.

Any redevelopment of the Tesco store should consider how it could reduce vehicle travel; introducing an active frontage on Burlington Road would bring the store within walking distance of many more residents, reducing demand for vehicle travel.

RP4: We welcome guidance that the site must provide walking and cycle access via Bodnant Gardens, however believe that this is not sufficient. Future development of this site must include a North/South pedestrian and cycle route through the site, connecting Bodnant Gardens with Bushey Road and opening up access for journeys to Raynes Park High School and the superstore located at site RP3; combined with works on Beverley Way, this would improve permeability of the development, and facilitate 'multi stop' shopping trips.

Despite these measures, given the site's location, it is unlikely that a retail development will avoid being heavily based on the car. Given potential future weaknesses in retail, other options for this site should be explored, including other uses that may be well suited to close proximity to the A3 (e.g. "Last mile" distribution facilities, such as those operated by cargo bike), as well as residential.

RP5: These facilities will be a great addition to Raynes Park, however new plans have a large car park, with access situated on Grand Drive, which is a dangerous road for people cycling and does not provide an attractive pedestrian route from Raynes Park station. The result is almost every player or coach is encouraged to arrive by car.

Work needs to be done with AELTC and the council to encourage arrival by walking from the local train stations or cycling. There is great potential for this site to be a key section in a local network of quiet pedestrian and cycle routes. A pedestrian and cycle path across this site from the back entrance on Cannon Hill Lane could link to a North/South link via Parkway and the playing fields next to Raynes Park Vale FC. The route across this site would follow the Southern boundary and exit onto Grand Drive. Additionally a new cycle/pedestrian path could be opened from Motspur Park station to Grand Drive - 80% of this path already exists going through Joseph Hood Park and the private grounds of Kings College emerging alongside the lane next to John Fisher school (the route follows that of a historic public right of way).

The traffic on Grand Drive is constant and if nothing is done to encourage active travel to the new facility it will be further exacerbated.

	<p>RP6: This site remains available for development as previous plans did not adhere to the planning inspector's clear guidance that permission was to be granted for Meadowview Road development solely on the basis of bringing the field into active sporting use. The guidance must be followed with respect to sporting use, especially as sports clubs have now been identified that wish to use the field.</p> <p>The current planning proposal is poor for active travel. It takes the existing dedicated high quality pedestrian/cycle path and chops it into three pieces. Given this is the highest quality piece of active travel infrastructure in the area, this is not acceptable. Alternative vehicle access routes (e.g. via Greenway) should be considered, as should options to provide a North/South across the site to link to the existing high quality path, providing an alternative to the hostile environment on Grand Drive.</p> <p>Cycle storage should be provided for all apartments and homes, in line with London Plan guidelines. London Plan guidelines for car space allocation should not be exceeded. < 1 car space per dwelling.</p> <p>RP7: This site has a single point of access via a narrow bridge that is not welcoming to pedestrians and people cycling. All proposals made for the site have failed to address this. Guidance should be made that the site cannot be developed without a second point of access. Without this, there is a risk that residents will tend to use cars to journeys that are very short as the crow flies, such as to West Wimbledon School. Cycle storage should be provided for all apartments and homes, in line with London Plan guidelines; due to close proximity to Raynes Park station and PTAL score of 4-5, a maximum of 0.5 car parking spaces per dwelling should be provided.</p> <p>RP8: The location of this site, adjacent to Motspur Park railway station, presents a unique opportunity to create a “cycle hub”, providing high quality cycle storage for both rail passengers and local shoppers, and helping to reduce vehicle use within a relatively car-dependent area of Merton. Any future redevelopment must include these facilities in addition to provision of a library.</p> <p>RP9: No additional comments</p>
<p>South Wimbledon</p>	<p>Policy N3.5f and N3.5i are welcome but provide very weak guidance on the need for active travel.</p> <p>They need to be significantly strengthened and reworded. Current proposals to “encourage” active travel are inadequate if not supported by enabling infrastructure that creates safe spaces for pedestrians and people cycling. In particular, segregated cycle lanes should be specified in the plan as part of a network of pedestrian and cycle routes (not just isolated improvements).</p> <p>This network should include improvements to Merton High Street, Merantun Way, and High Path. In particular, the opening of the new Harris Academy on High Path has increased the necessity for safe pedestrian and cycling access to and through this area from all directions.</p> <p>Redevelopment of the High Path estate presents a unique opportunity for properly planned quietway access through and around this large site. The Local Centre boundary should be extended south and east to include the area bounded to the south by Merantun Way and to the east by Abbey Road.</p>

	<p>More details are set out in our response to the 'Transport' section of the Local Plan.</p>
<p>Wimbledon</p>	<p>There is an urgent need to reduce motor traffic in Wimbledon town centre; Wimbledon has become an increasingly unwelcome and unappealing place to shop or sit out in cafes because of the fumes, noise and threat of motor traffic. Other nearby town centres, such as Kingston, have thrived based on pedestrianised spaces, and have invested in cycle provision.</p> <p>To this end, we support the policy objectives to build a vibrant, green town centre, and support policy N3.6.c, h, i, j, p, with the following comments:</p> <p>N3.6.i - greater specificity is required on the proposed measures to improve the town centre for people cycling; of note, there is no detail provided on this in the Transport Local Plan or its appendices. Fully segregated routes for people cycling should be sought.</p> <p>N3.6.j - we support introduction of new bridges across the railway, and enhancement of the railway forecourt; any new bridges over the railway should provide ramped access and segregated pedestrian and cycle facilities, to maximise connectivity and limit barriers to accessibility; Wimbledon Bridge should be widened as part of any extensive redevelopment of Wimbledon station or Wimbledon Bridge House, with segregated cycle lanes provided.</p> <p>N3.6.p - greater specificity is required. The main centres in Wimbledon High Street and near the station need to be made accessible to people with:</p> <ul style="list-style-type: none"> - Crossings on every arm of roundabouts (including Wimbledon Hill Roundabout, Church Rd roundabouts (opp. St. Mary's), Worple Rd roundabout) - More zebra crossings both along shopping streets and in residential areas - Wider footways - Protected cycle routes. <p>We have outlined additional comments in the 'Transportation' section of this response</p> <p>N3.6.r - add a new policy: "Promote and support the need for sustainable, environmentally friendly development in the Plough Lane area to ensure that traffic levels are managed to improve local health and wellbeing and that incoming businesses contribute to a high-quality retail and leisure offering."</p> <p>N3.6.s - add a new policy: "Constrain activities that are environmentally unfriendly, pollution-generating, or yield high volumes of HGV traffic in industrial estates such as Weir Road where the surrounding area is increasingly residential. Encourage relocation of activities which generate high levels of HGV movements through Wimbledon centre."</p> <p>In addition, we have the following commentary on the justifications provided:</p> <p>3.6.5 - The starting point for greening is cutting out or reducing motor traffic, leading to cleaner air and quieter more pleasant streets. The need to reduce motor traffic should be more explicitly stated.</p> <p>3.6.18 - This should include facilities for last-mile delivery model and bike</p>

delivery services, recognising that these are not necessarily based in town centre locations

3.6.19 - The final sentence should additionally include reference to co-working spaces

3.6.20 - This should include a reference to Wimbledon Stadium

3.6.22 - The final sentence should include "... and limited"

3.6.23 - Sustainable access to Wimbledon Village Centre from Wimbledon town centre would be improved by an electric bike hire hub at the bottom of Wimbledon Hill. Safe segregated cycle access between Wimbledon Village and Wimbledon town is included as part of our response to the 'Transportation' section of this consultation and should also be an ambition, as are the routes between Wimbledon town centre and the AELTC, and Wimbledon Stadium in Plough Lane

3.6.24 - Wimbledon village's "attractive environment" is very negatively impacted by the high levels of traffic that can create a polluted, unpleasant environment, and a 'barrier' for pedestrians crossing the road. It is vital that measures are taken to widen pavements and improve the high street setting for shoppers. The current temporary closure of Wimbledon High Street West should be made permanent, with al fresco dining opportunities created.

3.6.27 - Step-free access to the southbound platform of Haydons Road railway station should be implemented as a priority.

Specific feedback on site allocations:

Wi1: Opportunities should be sought to improve permeability of the site for walkers and cyclists; namely: connectivity with Battle Close and Autumn Close; linkage to Garfield Road (if feasible with existing land owners); enhancement of footpaths linking Garfield Road / North Road / Battle Close, including removal of barriers to cycle accessibility on the path linking Garfield Road and North Road.

Wi2: Development should be 'car free' given its high PTAL score of 6a; appropriate cycle parking should be provided for both short term and long term uses

Wi3: Any future masterplan for the area surrounding the AELTC must incorporate enhanced cycle provision (segregated) on Church Road. Inclusion of additional public amenity within the masterplan would be welcomed, such as a perimeter pedestrian / cycle route around Wimbledon Park Lake, and introduction of new walking / cycling routes connecting Wimbledon Park / Revelstoke Road to the southern end of Church Road, improving access to Wimbledon Village. In addition, opportunities to introduce sustainable transportation to/from the AELTC site should be investigated, such as electric bicycle hire / bike taxis.

Wi4: *Site does not exist in plans provided*

Wi5: A pedestrian route between the Broadway and Hartfield Road should be maintained as part of any future development. Development should be 'car

free' given its high PTAL score of 6a; appropriate cycle parking should be provided for both short term and long term uses.

Wi6: Development should be 'car free' given its high PTAL score of 6; appropriate cycle parking should be provided for both short term and long term uses.

Wi7: Any redevelopment of this site must safeguard a future pedestrian cycle and access point to the Wandle trail, with minimum accommodation of a 2.5m shared use path (LTN 1/20) on the brief perimeter of the site adjacent to the river Wandle

Wi8: Development should be 'car free' given its high PTAL score of 6; appropriate cycle parking should be provided for both short term and long term uses, including a "cycle hub" to accommodate cycle parking for commuters using the railway station

Wi9: Development should be 'car free' given its high PTAL score of 6; appropriate cycle parking should be provided for both short term and long term uses. If a hotel or offices are to be developed, appropriate 'off road' loading / unloading space must be provided for vehicles, in order to ensure the road and/or pavement is not obstructed. The redevelopment of this and other sites on St George's Road should be used as an opportunity to create protected cycle routes to and through central Wimbledon, with access to an improved railway-side cycle/pedestrian quietway

Wi10: Development should be 'car free' given its high PTAL score of 6; appropriate cycle parking should be provided for both short term and long term uses. If a hotel or offices are to be developed, appropriate 'off road' loading / unloading space must be provided for vehicles, in order to ensure the road and/or pavement is not obstructed

Wi11: A pedestrian route between Broadway and Hartfield road must be maintained, and existing public space provided by the piazza must be protected / enhanced. A potential to create a two-way cycle route through the site between Beulah Road and Queen's Road should be assessed.

Any proposals for the site must accommodate:

- Two-way traffic flow on Hartfield road
- Full segregation of cycle routes through Wimbledon Town Centre and along the length of the Broadway
- Improvement of pedestrian environment (e.g. widening of pavement / reallocation of road space / soft landscaping)
- Short and long-term cycle parking in line with London Plan

Wi12: Any further development of this site must incorporate safe, segregated cycle access along Plough Lane and connecting with Garratt Lane and Wimbledon Road.

Continuing development of this site must incorporate a shared-use north-south pedestrian/cycle route between Plough Lane and Riverside Road as per planning permission already granted. Plough Lane and Summerstown require protected cycling provision to LTN 1/20 standards.

Provision must be incorporated for cycling / pedestrian access to the Stadium

	<p>and residential properties. Safe cycle storage and facilities (lockers, showers etc.) must be incorporated in all residential/office developments, and must meet London Plan 2020 guidelines as a minimum.</p> <p>Wi13: The redevelopment of this site must be used as an opportunity to improve the streetscape of Worple Road, by:</p> <ul style="list-style-type: none"> ● Substantially reducing or removing through motor traffic, ● Including formal crossings on the roundabout ● Providing more and quicker crossings on Worple Road and Wimbledon Hill ● Reallocating traffic lanes to footway space and soft landscaping ● Providing protected cycle facilities along the length of Worple Road and Wimbledon Hill ● Development should be ‘car free’ given its high PTAL score of 6a ● Appropriate cycle parking should be provided for both short term and long term uses. ● Provision of a pedestrian link between Worple Road and St George’s road is supported. <p>Wi14: See comments for Wi13.</p> <p>Wi15: Development should be ‘car free’ given its high PTAL score of 6a; appropriate cycle parking should be provided for both short term and long term uses. Development should ensure pavements on Trinity Road and Broadway are widened, to improve public realm and to create space for safety improvements to the road junction for cyclists and pedestrians.</p> <p>Wi16: It is essential that any development of this site accommodates future widening of Wimbledon Bridge, and the construction of a ramped, segregated pedestrian / cycle bridge to the north of the railway station. Development should be ‘car free’ given its high PTAL score of 6a; appropriate cycle parking should be provided for both short term and long term uses, and a commuter cycle hub provided adjacent to the railway station.</p>
<p>Climate Change</p>	<p>No comments</p>
<p>Places and spaces in a growing borough</p>	<p>D5.1.c: We support prioritisation of pedestrians and cyclists within the public realm; greater specificity should be added to this policy with public realm remaining accessible to the general public 24x7 and with cycle routes segregated from pedestrians where feasible</p> <p>D5.3.vii: This policy should be adapted to ensure that construction impacts on pedestrians and cycles are also adequately mitigated</p>
<p>Economy</p>	<p>TC7.7: We support policy TC7.7 to protect local / corner shops, as a key enabler to 15-minute neighbourhoods and providing residents’ with essential amenities that are accessible via active travel modes</p> <p>EC7.2: We support policy (b) to only support proposals for development which do not adversely affect pedestrian, cycle or traffic movement, road safety or local amenity. Specifically, Merton should not support construction of new or expansion of existing waste management facilities where this results in an increase in goods vehicle movements. Such businesses lead to a large number</p>

	<p>of HGVs transiting through Merton, using single-carriageway roads and impacting pedestrian and cycle safety. We support relocation of existing sites which necessitate high levels of HGV movements from areas which can only be accessed via town centres (e.g. Wimbledon, Raynes Park) to sites which abut major highway routes (the A3). This will reduce the number of HGV traffic transiting through Merton single-carriageway roads and threatening pedestrian and cycle safety, and having a negative impact on air quality.</p>
Green and Blue Infrastructure	<p>O8.1: We support policies (b) to improve accessibility of open space and (f) enhancing accessibility of our waterways. Many of Merton’s green spaces provide key walking and cycle links in a pleasant and safe environment and are an essential component of our borough’s active travel network. However, as part of this policy, the quality of the walking and cycle network within Merton’s green spaces needs to be improved. Specifically:</p> <ul style="list-style-type: none"> - Removal of barriers to access (such as ‘chicanes’), which can impede access for those with pushchairs, wheelchairs, or many non-standard bicycles - Where feasible, widening of existing shared use pathways to meet current DfT guidance (3m wide where <300 cyclists per hour; 4.5m wide where >300 cyclists per hour) or creating segregated cycle lanes (such as Raynes Park - New Malden cycleway) - Introduction of all-weather surfaces in order to reduce the risk of portions of the network becoming “mud bogs” during winter months, improving accessibility for both pedestrians and people cycling
Health and Wellbeing	<p>HW2.1: We support policies (f) to create safe, healthy and accessible neighbourhoods, and (g) encourage more walking and cycling. However we would ask that these policies more explicitly call out Low Traffic Neighbourhoods and School Streets as being examples of effective interventions that would support the delivery of these policy goals</p>
Housing Provision	<p>H4.2: This policy needs to provide more explicit guidance on required cycle and vehicle parking facilities; specifically it should state that</p> <ul style="list-style-type: none"> - The minimum cycle parking requirements are as per London Plan Policy T5, with provision of recharging facilities for electric bikes and provision for at least 5% of bicycles to be ‘non-standard’. - The maximum number of car parking spaces permitted is as per London Plan Policy T6, notably with all PTAL 5 or 6 developments being “car free” <p>H4.5: We support the requirement for student accommodation to provide high quality cycle parking facilities, however the policy should be more explicit, and reference (a) minimum standards for short- and long- stay parking for student accommodation, per London Plan Policy T5, (b) provision of recharging facilities for electric bikes and (c) provision for at least 5% of bicycles to be ‘non-standard’.</p>
Infrastructure	No comments
Transport and Urban Mobility	<p>T6.4: Improving Travel Choices</p> <p>T6.4a - The phrase 'Vision zero' should be clarified here. Does it refer to the Mayor's goal that all deaths and serious injuries will be eliminated from London's transport network by 2041? If so, this aim is supported. However in</p>

the context of the Council's stated goal to achieve 'net zero' in relation to climate change, this term is open to misinterpretation when determining planning applications without adequate definition

T6.4b - Should read 'encouraging people to travel less *by car*'

T6.4d - We agree that a low carbon economy is important but the linkage to improving travel choices is not clear

T6.4e - We support this, but an additional objective is required to create a coherent network of walking and cycling routes that support a modal shift to active travel.

T6.4f - Major sites should not only have to undertake a healthy streets assessment, but also reach a minimum score and make changes to their scheme if they don't achieve this. (Paragraph 8 of the 'Justification' suggests this is the policy, so it should be reflected in the policy section.)

T6.4g - A new policy should be established that Merton will develop an integrated cycle network so that all of Merton's residents are in close proximity to a cycle route, with routes every 250-400m

Paragraph 3 of the 'Justification' section suggests that an additional policy point should also be added along the lines of:

"New developments will need to encourage a reduction in car use and support the shift to sustainable transport alternatives in the first instance and support remaining vehicle journeys being low carbon."

Para 7 of Justification is not clear and its meaning and reason for inclusion in the Justifications for the policy made clearer.

T6.5: We support the requirement of new development to maximise permeability and improve walking links. However this policy should not be applied solely to private development, but additionally to existing council-managed spaces. Merton needs to develop a strategic walking and cycling network, and as part of this improve the quality of the pedestrian environment, including pedestrianisation where feasible (e.g. Wimbledon Village High Street West, Wimbledon Broadway, St Mark's Road (in line with our comments on site Mi8).

In the application of this policy to private development, any active travel links must be accessible to the general public 24 hours a day / 7 days a week. There are unfortunately examples of historic links through private land (e.g. Schoolgate Drive) that have been closed to the public.

T6.5b - We support the aims of this policy, however it should go further in contributing to liveable and low car neighbourhoods than just providing better walking connections; we suggest adding '*...walking connections and facilities other measures that could include places to sit, socialise and shelter and facilitate street activities.*'

T6.6: Prioritising Cycling

T6.6: We support the requirements to be made of new developers in providing cycle parking meeting London Plan standards, provisioning for non-standard

cycles, electric cycle charging, as well as provision of showers, storage facilities, and changing rooms in large non-residential sites.

Whilst we agree that developers should contribute to and support the delivery of a strategic cycle network, we additionally need to see further leadership from Merton council in defining and delivering this strategic cycle network.

The proposals within the Local Plan represent a small increment on measures included within the LIP3 plans, but do not yet represent a fully coherent vision of an integrated cycle network within the borough that reflects existing and proposed infrastructure, nor reflects the level of ambition we would expect to see in a plan with a lifespan of ~10 years.

We have provided detailed commentary on the specific measures included in the Local Plan in the following section.

All future cycle infrastructure within Merton (whether delivered by Merton or developers) needs to be of high quality, meet latest DfT design guidance (LTN 1/20) at a minimum. Specifically, proposals should:

- Be designed with users of all ages and abilities in mind
- Maximise opportunities to improve permeability
- Be accessible to members of the public 24 x 7
- Provide full segregation between cycles and pedestrians and avoid shared space unless delivery of the scheme would be otherwise infeasible
- Accommodate non-standard bicycles
- Avoid 'chicanes' and other barriers to access
- Avoid requiring cyclists to dismount
- Are constructed with a smooth, all-weather, enabling year round usage
- Incorporate lighting where appropriate, in a manner sensitive to the immediate environment of the route (including use of low-level / motion activated lighting in sensitive areas or where dark skies are to be preserved)

New routes should be protected through creation of public rights of way.

T6.6e - We support this requirement, however there is no definition of 'large' non-residential development. Smaller sites should also consider provision at an appropriate scale to support staff travel by bicycle.

This policy requirement also only relates to staff provision; provision should also be made for visitors to arrive by bicycle.

The relevance of paragraph 1 of the 'Justification' to this section is unclear.

The option for developers to pay for on-street cycle parking (paragraph 5) is not adequate; cost for residents to park in any on-street provision should be covered in perpetuity, reflecting the same level of provision as if it was provided on the property itself.

The contents of paragraph 6 regarding mobility services are relevant and supported, however are not reflected in the policies within T6.6. Additional policies should be created to reflect this paragraph.

T6.7: Managing Transport Impacts

T6.7a: This policy should be clarified to ensure that any impacts on pedestrian

	<p>and cycle infrastructure during construction are appropriately mitigated (e.g. road diversion routes consider cyclists, provision of temporary segregated infrastructure)</p> <p>T6.7b: We do not support this policy in its current form, as we believe the current wording provides scope for parking to be included within developments with high PTAL scores; this policy should be updated to state that the maximum number of parking spaces included within a development should not exceed those defined in the London Plan Policy T6; notably the 2020 revision of this policy requires all residential, retail, hotel and leisure developments in PTAL 5 or 6 areas to be “car free”.</p> <p>T6.7d: We support the policy, however wording should be amended to read “checked and validated Transport Assessment”</p> <p>T6.7e: We support the principle of this policy, however Officers have agreed this year that the classification of 'London Distributor Roads' should no longer be used, and is not referenced elsewhere in current London transport planning policy. This legacy reference should be eliminated from this policy.</p> <p>Nothing is said about how the Council will tackle poor public transport defined in para 5 of the Justification as areas with a PTAL score of 2 or below - which is a large proportion of the borough according to the map. This will be crucial to achieve the stated aims of the Local Plan.</p> <p>T6.8: Parking, Deliveries, and Servicing</p> <p>T6.8: We do not support policy (a) in its current form, in line with the comments noted above for T6.7. In addition, in line with London Plan policy T6.C, we believe the wording of policy (a) should be updated to state that if the introduction of a new controlled parking zone would enable the delivery of a car free development in a PTAL 3 or 4 area, Merton will assess the feasibility of doing so.</p> <p>T6.8k - Merton should encourage rather than 'support' distribution and collection facilities that support low carbon vehicle fleets.</p> <p>We believe that the council should not support construction of new or expansion of existing waste management facilities where this results in an increase in goods vehicle movements. Such businesses lead to a large number of HGVs transiting through Merton, using single-carriageway roads and impacting pedestrian and cycle safety.</p>
<p>Transport and Urban Mobility - Commentary on cycling measures proposed by Merton</p>	<p>We have outlined detailed commentary on the specific cycling measures proposed by Merton in the Local Plan. We have prepared these comments on the basis that the Local Plan will have a 10+ year lifespan, and have set the level of ambition accordingly.</p> <p>Note that our comments are solely on the “Proposed Cycling Measures” document; the proposals in the “Walking and Cycling Routes Map” documents are not clear and further clarification was not provided by Merton when requested.</p> <p>1 - Install a Toucan/Pedestrian phase across Windmill Road and Croydon Road. Works are due to commence summer 2019 and will require uptake</p>

of common land - *Project already delivered. Improves pedestrian safety but does not make material contribution to cycle network*

2- Investigate walking/cycling connections in the region of pollards hill including connections into Croydon. (Links to liveable neighbourhood bid at pollards hill). - *Comments TBD*

3- Investigate improvements on Sandy Lane and Streatham road including wayfinding interventions. - *Wayfinding is not sufficient to deliver improved pedestrian / cycling environment*

4- Signed wayfinding scheme connecting Mitcham/Tooting & Colliers Wood (avoiding the northern end of western road). - *Wayfinding is not sufficient to deliver improved pedestrian / cycling environment; at a minimum, chicane barriers need to be removed. As the route runs through a park, it is not open at night time (arguably when people cycling are more at risk) and an adequate route needs to be in place 24x7*

5- Improve cycle facilities in region of Colliers Wood bus depot. - - *Temporary segregation installed on Merton High Street needs to be made permanent, with provision extended beyond current implementation*

6- Investigate measures to link up the cycle superhighway (cs7) with Clapham common to Wimbledon quietway. - *Any proposed linkage following residential streets needs to be accompanied by a signalled junction with A238. Currently people cycling on the southbound carriageway to the A238 trying to access roads in Denison Road area face unsignalled and intimidating turns to the right, requiring them to merge into vehicular traffic from the segregated cycle lane, then stop and block vehicular traffic whilst waiting to turn right*

7- Tighten up kerb geometry at junction of East Road/South Road and the mini roundabout on North Road/East Road. - *Measures to tighten the geometry here and at any other 'wide' junctions are welcome to improve pedestrian safety. Of particular concern is the junction of Queens Road with Haydons Road, where a wide geometry encourages vehicles to maintain high speeds and contributes to excessive risk to pedestrians wishing to cross this junction. Many of these pedestrians are children and families given it is route to school for four local primaries.*

Merton should consider opportunities to implement 'pocket parks' or secure cycle storage on land 'unlocked' following the tightening of geometry

8- Signing and wayfinding scheme to avoid the South Wimbledon junction. *This is an inadequate response to the risks associated with the South Wimbledon junction, which sees a high volume of commuter cycle and pedestrian traffic flow, which will increase following the opening of the Harris Academy on High Path. Initiative #21 to improve the junction itself should take precedence*

9- Improve ped/cycle timings at junction of Coombe Lane/West Barnes lane financial year 2020-2021. *Present timings appear to be satisfactory*

10- Segregated path to link Raynes Park with New Malden alongside railway line. Works expected to be complete June 2019. *Works have been completed. The section running parallel to the railway track, with fully*

segregated pedestrian and cycle paths, should be considered a high quality model to be replicated elsewhere in the borough. Further work is required to close the 'missing link' in Raynes Park town centre, in particular by providing fully segregated cycle access connecting the Coombe Lane cycle lane to Kingston Road, Wkye Road (for LCN 208) and Lambton Road (for destinations north), using Skew Tunnel and removing the existing shared pedestrian / cycle space and requirements to dismount cycles.

11- Provide a 2.5m shared use path in town green alongside Commonsides West. *As a design principle shared use paths should not be built where other options exist, as they do not provide a high quality environment for either pedestrians or people cycling. We would advocate for a fully segregated cycle lanes on each side of Commonsides West*

12- Improve existing footpath alongside western side of Lavender Park. This will involve resurfacing existing block paved path and possibly widening by relocation the fence line in the park. *We support improvements to the surface of the footpath, however per our response to point #4 do not believe that a cycle route through Lavender Park would be adequate provision for people cycling on this route as the park is closed at night*

13- Proposed compacted gravel path through Abbey Park with minimum width of 2m shared-use. *Per LTN 1/20 design guidance shared use paths should be avoided as they can create conflict between pedestrians and people cycling and in particular present a challenging environment for visually impaired people. This route should have a fully segregated cycle path, and the path should be surfaced with a smooth, sealed surface, to support all-weather riding and to remove accessibility obstacles that would be presented by a gravel surface. If a shared path is to be adopted, the minimum width of the path should be 3m, in line with LTN 1/20 guidance.*

14- Potential cycle contra-flow on Lingfield road *A cycle contra-flow here may provide some benefit to nearby residents; however The Grange presents a more effective cycle route to Worple Road, as it connects with Ridgway Place without requiring people cycling to join Ridgway*

15- Proposed toucan crossing across Bushey road *- A toucan crossing in this location would be beneficial for pedestrians accessing David Lloyd or Prince George's Playing Fields; it would provide further benefit if connected to a foot / cycle path crossing Prince George's Playing Fields to connect with the existing footpath running between Grand Drive and Whatley Avenue. Separately, a light phase should be added to enable people cycling to travel between Martin Way and Sydney Road, crossing Bushey Road*

16- Improve existing link from Whatley Avenue to Grand Drive to create shared-use path. This will need approval from the land owner which is currently being investigated. *Per LTN 1/20 design guidance shared use paths should be avoided as they can create conflict between pedestrians and people cycling and in particular present a challenging environment for visually impaired people. This route should have a fully segregated cycle path, and the path should be surfaced with a smooth, all-weather surface to support riding through the year and to remove accessibility obstacles that would be presented by other surfaces. If a shared path is to be adopted, the minimum width of the path should be 3m, in line with LTN 1/20 guidance.*

17- Investigate measures to improve cycling infrastructure on Martin Way
We support measures to improve cycling infrastructure on Martin Way, noting that this should include segregation of cycles from vehicle traffic, and introduction of a light phase at the junction with Bushey Road to enable people cycling to travel between Martin Way and Sydney Road

18- Investigate measures to improve cycle infrastructure between Motspur Park/Wimbledon Chase and Merton park

Significant work is required to improve these cycle links, including:

- Removal of all 'chicane' barriers
- Widening of any shared use sections to minimum 3m
- Introduction of dropped kerbs where not currently in place (e.g. Melbourne Road)
- Introduction of low traffic neighbourhoods to prevent the route being used by through traffic
- Where 'on street' routing is required on Grand Drive, prohibition of all on-street parking, and removal of pedestrian crossing islands on the relevant section of road

19- Investigate walking/cycling connections in the region of Willow Lane Industrial estate

We support measures to improve cycling / walking infrastructure connecting the Willow Lane Industrial estate. Potential routes could include connections with the Wandle Trail and Brookfields Avenue. There should additionally be improved provision on Goat Road and Willow Lane.

20- Investigate potential 2 way cycle track on common land between Cedars Avenue and Watneys Road (subject to approval from the Mitcham Common Conservators). *We support the introduction of this cycle route, however on its own it does not provide a useful cycle route; the route should be extended to Upper Green East to provide a connection to Mitcham Town Centre, and extended down Watneys Road to Croydon Road to provide a cycle link towards Croydon*

21- Re-explore improving south Wimbledon Junction incorporating measures to make the junction safer for cyclists. *We support this measure, however it additionally needs to be accompanied with measures on Merton High Street, Kingston Road, and Morden road, including segregation. Any works to this junction should accommodate cyclists wishing to turn, and not just east <> west flows.*

22- Investigate improvement measures for roundabout and improve cycle infrastructure on Garth Road, Lower Morden Lane and Hillcross Avenue.

We support this measure, noting that there is adequate space at the roundabout for a full 'dutch style' roundabout. Segregated access should be provided on Lower Morden Lane, and on Garth Road (at least to the junction with Green Lane); measures to provide safe, segregated access from the roundabout to Morden should be explored, either via Hillcross Avenue or Morden Park. Consideration should also be given to replacing the roundabout with a signalled crossroads, with Lower Morden Lane (eastern) closed by modal filter or re-routed to meet Tudor Drive opposite Lynmouth Avenue.

23- Explore improving Bushey road junction particularly the east bound movement from Bushey Road into Martin Way. Investigate improvement measures on approach to junction from Kingston Road. *Improvements to this junction should include the introduction of a light phase that enables people*

cycling to travel north/south between Martin Way and Sydney road. Under such a design, eastbound movement from Bushey Road to Martin Way could be accommodated via a 'two stage' turn (LTN 1/20 10.6.28)

24- Morden Town Centre Regeneration scheme to provide cycle improvements. Works estimated to commence 2022. Significant improvements should be made to walking and cycling infrastructure as part of Town Centre Regeneration, including:

- Mandating that greenway access is included roughly following the Northern line tracks to improve permeability for pedestrians and people cycling from the north
- Improving connectivity to cycle routes to Raynes Park, via links to Martin Way
- Improving accessibility for pedestrians and people cycling to Morden Hall Park
- A clear plan for pedestrian and segregated cycle routes across the whole site, potentially making better use of the footpath just west of the Northern line at 2 Crown Lane
- Improving links to A24 cycle lanes (north and southbound)

25- Improve cycle facilities on London Road between Figges Marsh and Mitcham Town centre. *Due to the width of the road, fully segregated cycle lanes should be the ambition for this route. Works must include improving the safety of the junction between London Road and Streatham Road for people cycling*

26- Investigate bridge widening/improvements at Durnsford road. *The Durnsford Road bridge represents a highly constrained location and it is unlikely that the cycling / pedestrian environment could be significantly ameliorated without a rebuild or construction of a separate pedestrian / cycling bridge. Should the opportunity present itself, any works should meet or exceed DfT guidance for cycle infrastructure. In the meantime, better signage and enforcement of the 'do not overtake cyclists' rule and 20mph speed limit would be appreciated.*

27- Develop cycle proposals for "missing link and bridge crossing along Wandle trail in partnership with Wandsworth Council. *We support closing the 'missing link' on the Wandle Trail; any proposed design must meet or exceed DfT guidance.*

28- Investigate potential to upgrade existing tracks on Wimbledon Common with hard-bound gravel surface. *Works have already been completed*

29- Proposed new walk/cycleway through railway embankment improve safety for cyclists crossing of Lower Downs Road from Railway Path. *Our preferred solution for Lower Downs Road is to create a modal filter at the tunnel that permits use of the tunnel solely for cycles and pedestrians. A separate tunnel through the railway embankment would be beneficial to pedestrians, but of limited use to people cycling, and would require cyclists travelling in one direction to cross the road in order to access the tunnel. If the road is not filtered, it is essential that a signalled crossing with dropped kerbs is provided on the north side of the tunnel, for pedestrians and cycles using the railway path.*

	<p>30- Proposed wheel channel on footbridges subject to rebuilding. <i>Wheel channels are suboptimal; they do not provide a fully accessible solution - they do not improve pedestrian access for wheelchair users or those with pushchairs; they do not accommodate non-standard cycles, and they require a level of upper body strength that not all cyclists may have.</i></p> <p><i>If bridges are to be rebuilt, fully ramped options should be evaluated; bridges should additionally be built with sufficient width to enable shared use by pedestrians and cycles, in line with DfT guidance (LTN 1/20)</i></p> <p><i>Without rebuild, provision of wheel channels provides a viable lower-cost means to improve provision for a subset of cyclists.</i></p> <p>31- Investigate measures to improve the north/south link from park road to Morden road via Gap and Trinity roads. <i>Measures on this link should include modal filters on Trinity Road and Montague Road to reduce through-traffic, a signalled intersection with Kingston Road</i></p> <p>32- Investigate measures to improve cycling infrastructure on Morden Road. <i>Measures should include full segregation.</i></p> <p>33- Investigate measures to improve cycling infrastructure on Merantun Way. <i>Measures should include full segregation, improved safety at the roundabout adjacent to Merton Abbey Mills (inc. connection with Station Road for cyclists travelling along High Path), and a link via Christchurch Road to CS7</i></p> <p>34- Propose improvements to existing traffic free route from tandem way to Fleming Mead and improve link to London Road. <i>Improvements must include improvement to the junction of London Road and Merantun Way; given the land available at the site, this could potentially be a candidate for a “Cyclops” style junction. The link to Fleming Mead should be widened in line with DfT guidelines and separate walking / cycle paths provided where feasible</i></p> <p>35- Investigate measures to improve cycling infrastructure from Ridgway to Kingston road - For such a route to be attractive and effective, it would require a rebuild of the bridge over the railway at Alt Grove to include ramped access, and significant widening of the path to the south of the railway line. Provisions for such a design should be explored as part of Crossrail II design work or as part of any other proposals for the Network Rail land to the south of the railway line</p>
<p>Transport and Urban Mobility - Additional measures proposed by MRTG</p>	<p>In addition to the measures identified by Merton, there are several notable omissions that should be reflected in long term ambitions / plans for cycle infrastructure within the borough:</p> <ul style="list-style-type: none"> - Wimbledon Town Centre - creation of segregated cycle routes (in line with Mini Holland bid), in particular to facilitate safe travel North / South through the town centre - Raynes Park town centre - closing the ‘missing link’ within the local cycle network by providing fully segregated cycle access connecting the Coombe Lane cycle lane to Kingston Road, Wkye Road (for LCN 208) and Lambton Road (for destinations north), using Skew Tunnel and removing the existing shared pedestrian / cycle space and requirements to dismount cycles

- **Shannon Corner / West Barnes Lane** - segregated cycle lanes on West Barnes Lane, with linkage through to Shannon Corner Shops and Raynes Park High School via Bodnant Gardens / Beverly Way
- **Kingston Road** - segregated cycle lanes from Skew Bridge to junction with Lower Downs Road and Merton Park Tram Crossing to South Wimbledon
- **Worple Road** - segregated cycle lanes between Raynes Park and Wimbledon town centre
- **Gap Road and Plough Lane** - segregated cycle lanes to provide safe connection through to Garratt Lane and the Wandle Trail
- **Merton High Street** - retention and enhancement of existing temporary measures, to provide segregated route from Merton Park Tram Crossing to Colliers Wood

We are strongly of the opinion that the existing cycle proposal map is now out-of-date given the changes in demand for cycle travel arising from COVID-19 and the ongoing climate emergency.

We have drawn up a new ambitious cycle network for Merton based on existing infrastructure, planned improvements, and additional changes that could be implemented over the lifespan of this Local Plan. It provides a high level vision of the kind of network that is needed to ensure residents are within easy access of cycle infrastructure, with routes every 250-400m.

The map is included in the following appendix, and an online version can be accessed at: <http://bit.ly/MertonCycleMap>.

Appendix Two: Cycle Network Vision

The below maps set out an ambitious vision for Merton's future cycle network, based on existing infrastructure, planned improvements, and additional changes that could be implemented over the lifespan of the Local Plan.

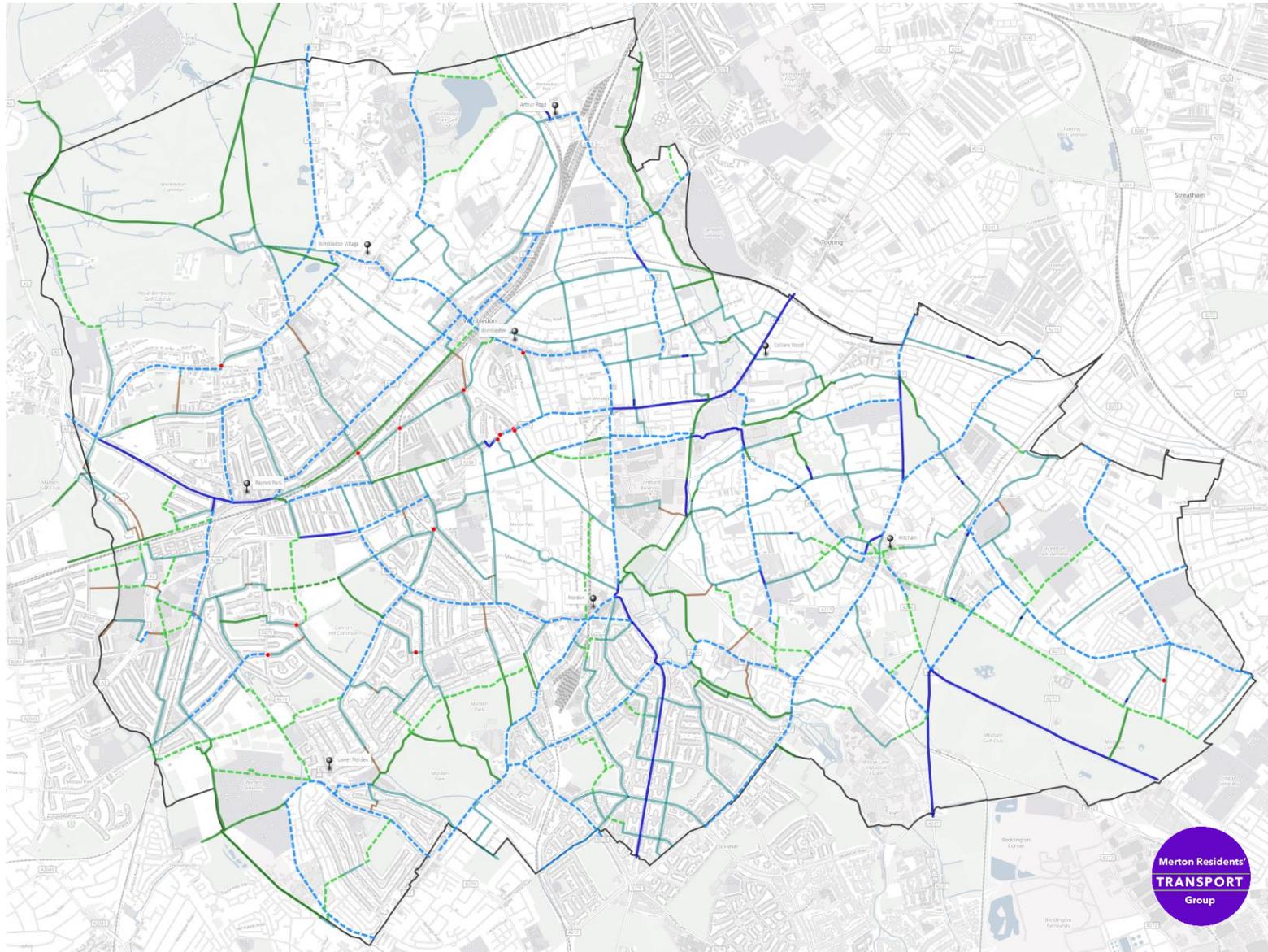
The map is split by route type, greenway vs road-based. Locations where investment is needed are shown by dashed lines.

Note that not every existing piece of infrastructure is shown, nor does the map fully align with Merton's previous proposed network, with additional proposals reflecting the magnitude of ambition. Accessing the map online provides additional commentary on the proposals; it can be accessed at <http://bit.ly/MertonCycleMap>.

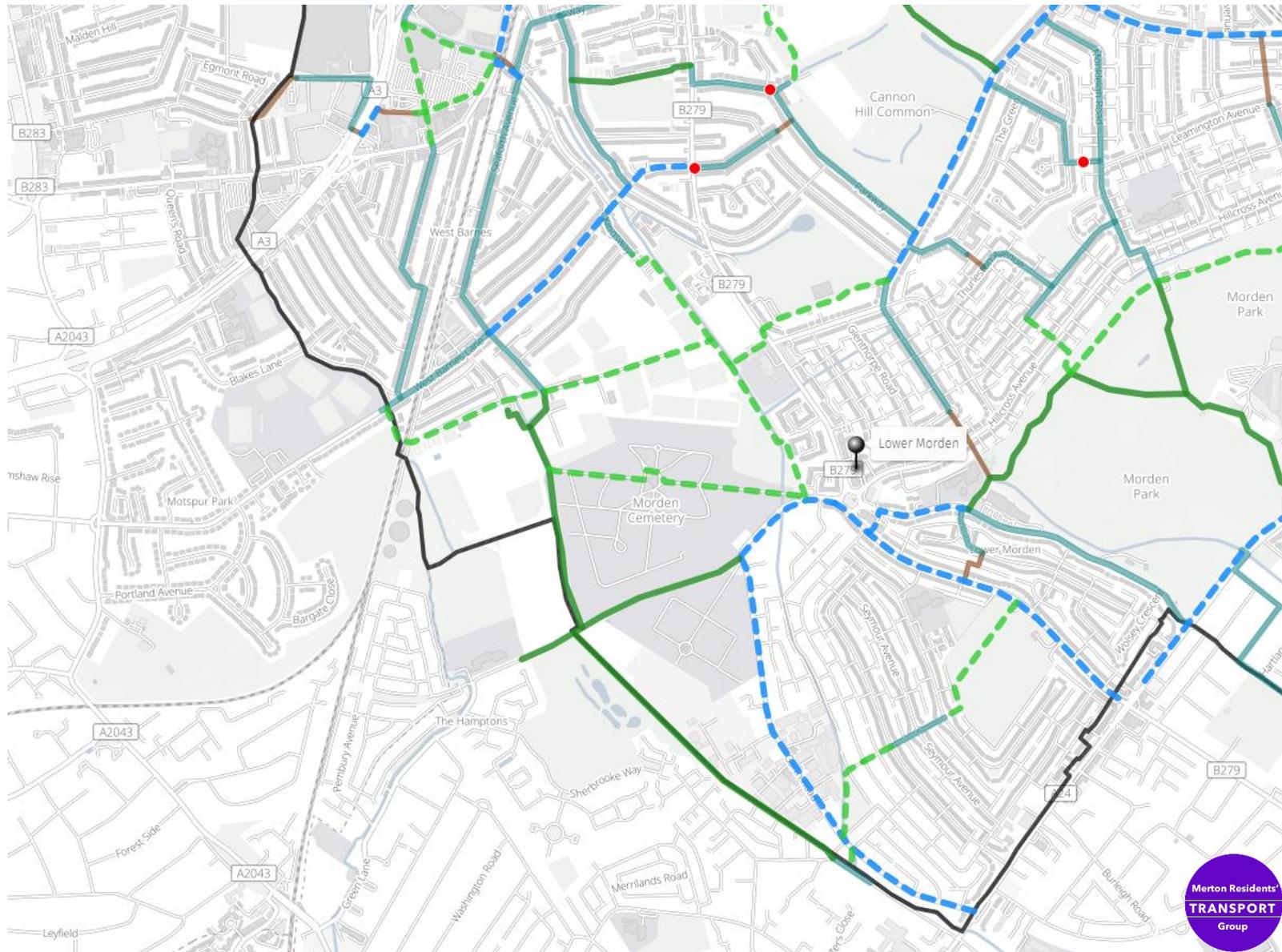
The maps use the following legend:

- | | |
|---|---|
|  Proposed greenway routes Potential new greenway routes. These may rely on land acquisition, or be part of major development sites |  Network links These roads link together the network. The roads are quiet enough that no major work is needed for them to form part of the cycle network. Some may rely on modal filters to gain sufficient safety. They will need to be correctly signed to form part of the network |
|  Existing greenway routes Off-road greenway/leisure routes of acceptable quality |  Modal filters Modal filters that are necessary to ensure the network links are a safe part of the network |
|  Proposed road-based routes On-road and adjacent-to-road routes that are needed to complete the network. designed as per LTN 1/20 |  Other routes Other links in the network, mostly footpaths |
|  Existing road-based links On-road and adjacent-to-road routes that are generally acceptable for use. Dashed lines indicate existing provision that needs enhancing, typically because of a poor surface or because it does not comply with LTN 1/20 |  Boundary of Merton |

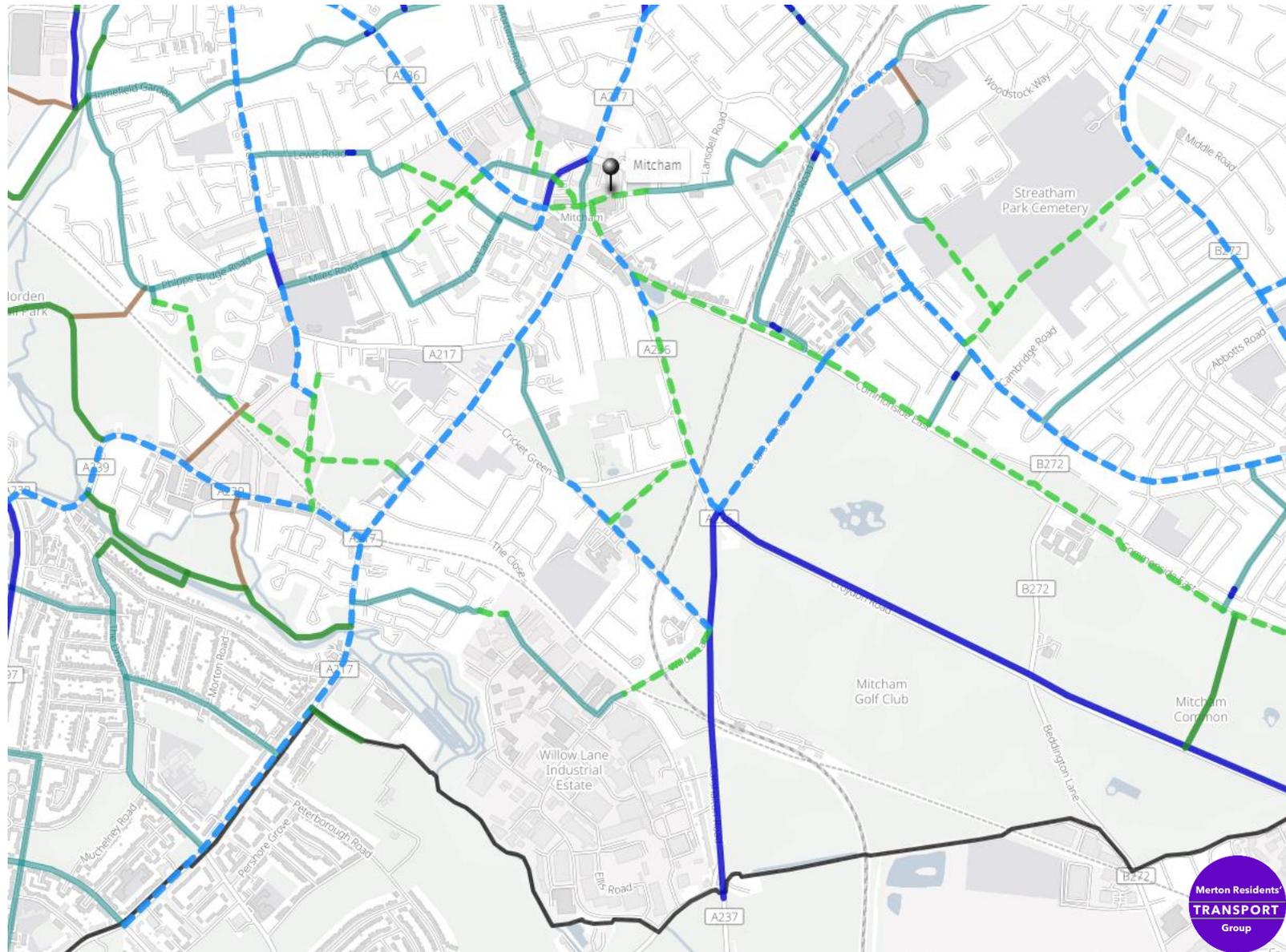
Cycle Network Vision: Merton Overview



Cycle Network Vision: Cannon Hill, Motspur Park, Lower Morden

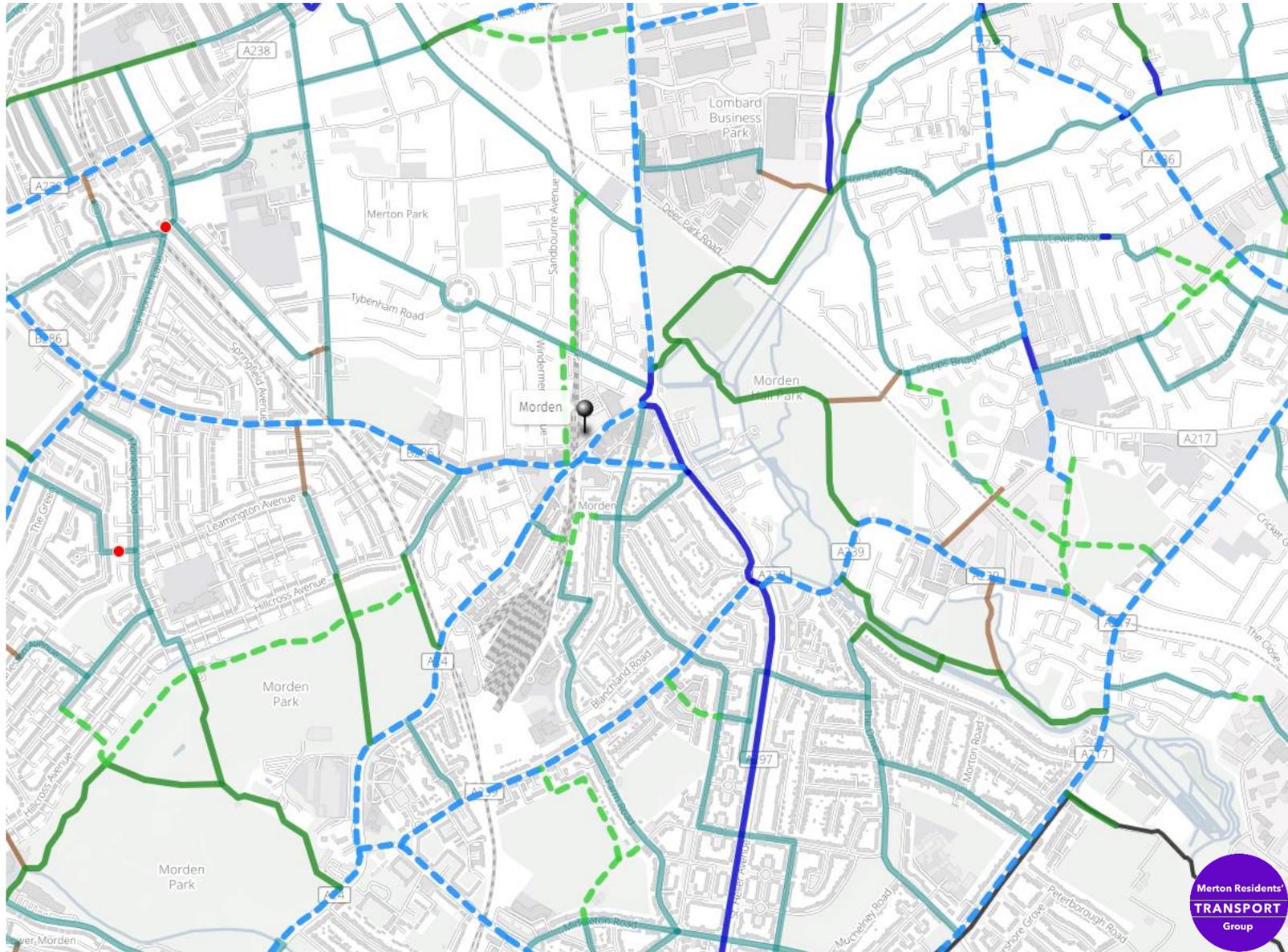


Cycle Network Vision: Mitcham



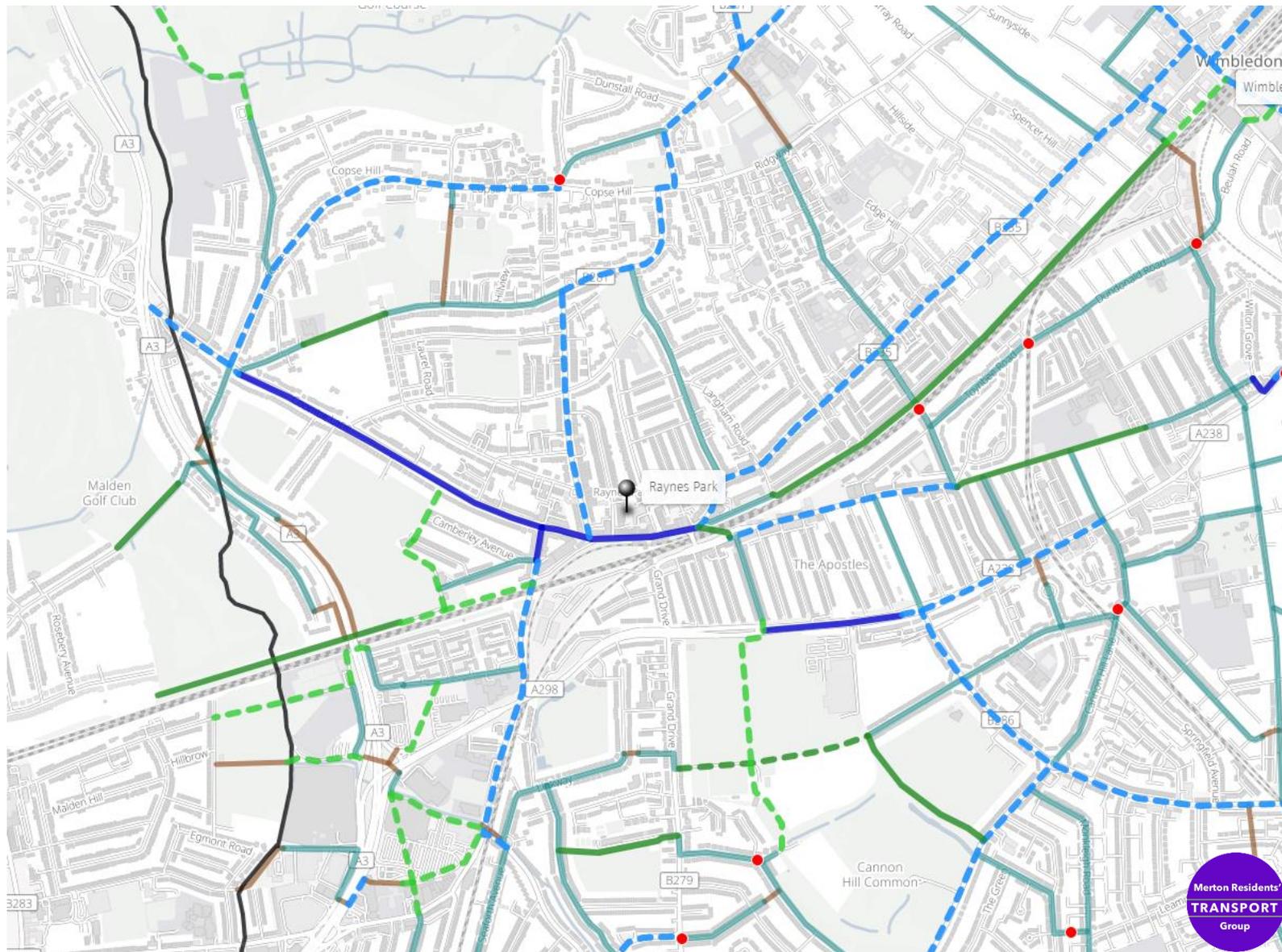
Map Data © OpenStreetMap contributors under OdbL; cycle network developed by MRTG contributors

Cycle Network Vision: Morden



Map Data © OpenStreetMap contributors under OdbL; cycle network developed by MRTG contributors

Cycle Network Vision: Raynes Park, Wimbledon Chase

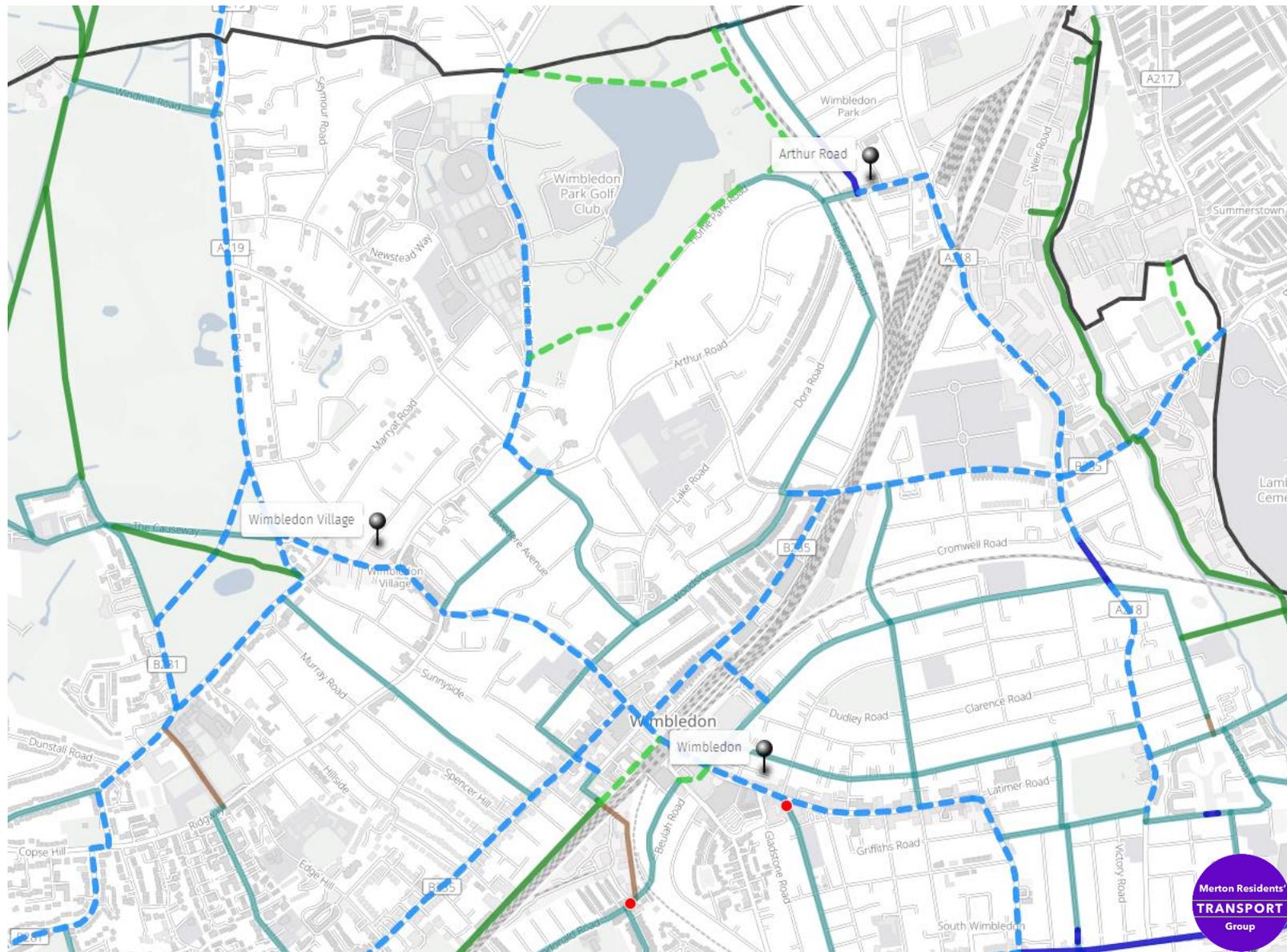


Cycle Network Vision: South Wimbledon, Colliers Wood



Map Data © OpenStreetMap contributors under OdbL; cycle network developed by MRTG contributors

Cycle Network Vision: Wimbledon



Map Data © OpenStreetMap contributors under OdbL; cycle network developed by MRTG contributors