

Merton Cycling Campaign is the local group of the London Cycling Campaign, representing the views of cyclists across the Borough and promoting active and sustainable transport.

## **Strategic Policy T16.1 Sustainable Travel**

**T16.1** notably omits any mention of the need to provide new high quality infrastructure in a network which is of sufficient quality and continuity to achieve Merton's active travel goals. At a minimum any new or upgraded infrastructure should meet the current DfT or TfL guidance that is of the highest standard at the time (e.g. LTN 1/20 and other such guidance that may be published during the lifetime of the Local Plan).

The implementation of a comprehensive network of safe and convenient cycle routes as promised in **Policy T16.1 (item c.)** and TN12 is undermined by Merton's lack of a Walking and Cycling Strategy and their being no reference to it, or a map of a planned network with a hierarchy of high quality routes. It is unclear what the network map at *Stage 3 - Transport Policies Map – Cycling* map represents. There is no meaningful key, all the "cycle network" is the same colour and there is no attempt to distinguish between route sections that are LTN1-20 compliant, sections that have some cycle infrastructure, and sections that have nothing at all and are in some cases outright dangerous. There is also no indication of whether they are existing routes to be protected/enhanced through development, or whether they are no routes to be brought forward by development through the life of the plan. Without greater clarity in this area the Plan risks being unable to control development in a way that sees it meet the objectives of the Plan. Until Merton has a viable cycle transport policies map (expected to be developed by 2023) the Local Plan should include the existing LIP 3 cycle policies map to ensure that development can be guided to contribute to a strategic and planned network.

## **Policy T16.2 Prioritising active travel choices**

The Plan is also deficient in that there is no attempt to explain how the TfL "Healthy Streets" approach reference at **T16.2** relates to this map or how Low Traffic Neighbourhoods fit it. For example, looking at Merton Park, Kenley Road, Dorset Road, Mostyn Road, Cannon Hill Lane are identified as cycle routes, but these currently have high traffic levels and considerable hazards. They are nowhere near LTN1-20 compliant. Without a coherent plan that sets out how such roads can be improved to bring them up to LTN1-20 compliance, it is impossible to assess how a development might contribute to the network, or how, for example, a school travel plan that involves significant levels of cycling would be credible.

The Local Plan maps should also include the London Mayor's Transport Strategy's 'Priority Connections' for a London wide cycle network identified in Merton for completion by 2041.

**Policy T16.2** of Merton's New Local Plan Publication Stage 3 promotes prioritising active travel choices. The justifications include the target in the London Mayor's Transport Strategy for all Londoners to do at least 20 minutes daily active travel by 2041, and Merton's relatively small size with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling, creating a significant opportunity for more cycle and walking journeys. The statement that Merton has "*a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling*" is quite simply, untrue. The cycle routes are largely of low

quality and cannot be said to make locations "easily accessible". The routes identified in the map Stage 3 - Transport Policies Map – Cycling are mainly roads with no cycle facilities at all, and with significant hazards, high volumes of traffic and high traffic speeds, and not compliant with LTN1-20. (Please see our separate comments on this map.

**Policy T16.2** acknowledges that currently a third of Merton residents do 20 minutes of active travel a day and that there has been a slight decline over the last five years. Of the daily trips 30% are conducted by walking but less than 2% are by bicycle. When proper, cohesive, well-designed opportunities for cycling are made available this will immediately attract cycling - if less than 2% of daily trips are by bicycle it is entirely because there are inadequate opportunities for more cycle journeys because there is inadequate infrastructure. This was confirmed in the Cycle Skills Audit commissioned by Merton in 2012 which said the provision was patchy; it is still patchy and will remain patchy if left to random contributions from private development.

**T16.1 and/or T16.2** should make specific reference to favouring development that enables, contributes to or makes provision for, the transformative removal of gyratories in town centres, as identified as an objective in other parts of the plan. Without this, or explicit reference to a walking and cycling strategy that seeks to create 'Liveable Neighbourhoods' there is no way Merton can expect to meet its active travel, health and well-being or climate change objectives.

**T16.2 a & b** – in order for development to deliver a Healthy Streets approach development sites should be required to create new Low Traffic Neighbourhoods through and around them, in line with a Cycling Network Strategy for the borough, not just integrate with existing infrastructure or routes when it is already in existence.

The justification for Cycle and Pedestrian networks at 17.2.4 – 17.2.6 should be clearer that there is also an equality issue - inadequate cycle routes are discriminatory against women, older people, children and others. All new infrastructure needs to be LTN1-20 compliant and existing infrastructure must be upgraded to such standards as soon as possible.

## **Policy T16.4 Parking and Low Emissions Vehicles**

**T16.4 a** should be specific about what constitutes "good" public transport accessibility for a site to ensure there is no ambiguity when development proposals are brought forward. Any development sites with a PTAL of 5/6a/6b should be care free, in line with London Plan guidance.