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Dear Paul,

Merton Residents' Transport Group (MRTG) response to Merton Local Plan Consultation Stage 3

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, 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)

We appreciate the significant effort taken by officers in preparing the Local Plan and in consulting with local groups such as ourselves. We are pleased to see several parts of the feedback we provided in our response to consultation Stage 2a reflected in the current draft of the local plan.

This letter sets out our response to Merton's Stage 3 Draft Local Plan, commenting on portions of the Draft Local Plan that are related to our Group's priority goals. Our comments are set out in the appendix below.

We note Merton's commitment in the draft Local Plan to develop a walking and cycling strategy by 2023 and we look forward to providing separate input to this process.

Yours faithfully,

Merton Residents' Transport Group

Appendix: Detailed comments to consultation

Specific changes to wording are highlighted in red

Policy	Comments
N5.1	<p>5.1.24:</p> <p>Update wording to include: <u>“Improvements to the cycle network are also required to improve connectivity with key destinations”</u></p> <p>5.1.52: Update wording to include:</p> <p>“It is therefore vital that Morden is well connected to the surrounding neighbourhoods and beyond by a network of safe and convenient pedestrian and cycle routes. <u>Cycling infrastructure must meet LTN 1/20 or any replacement</u>”</p>
Site Mo5	<p>Infrastructure requirements should include prioritising active travel access</p>
N6.1	<p>Paragraph c:</p> <p>Suggested update: “Securing well-designed and well linked improvements for pedestrians and cyclists and improved access to public transport facilities, including <u>connecting the Coombe Lane cycle route to Kingston Road, Wkye Road, and Lambton Road, adding additional pedestrian crossings, and</u> support for step-free access and improved secure cycle parking facilities at Raynes Park station.”</p> <p>Note: specific suggested pedestrian crossings required:</p> <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 <p>6.1.15</p> <p>“[...] While Crossrail 2 remains at the planning stage, we will continue to seek greater investment in all stations and surrounds <u>in advance of Crossrail delivery</u>, particularly step free access which will remove the barrier that currently exists for public transport access to all sections of the community”</p> <p>Rationale: The ongoing delays for Crossrail 2 mean we can no longer wait for delivery of Crossrail 2 before providing step-free access at Raynes Park station</p>

Policy	Comments
Site RP3	<p>Suggested amendment to Design and Accessibility Guidance:</p> <p>“Development of the site should <u>include improvements to public access to the currently overgrown and inaccessible Pyl Brook on the northern boundary of the site (Pyl Brook) and open this up as a greenway for pedestrians and cycles</u>”</p> <p>Rationale: This would help to address the deficiency in access to nature noted in the site guidance and create a new access link.</p>
N7.1	<p>Suggested rewording for Paragraph i:</p> <p>“<u>Support improvements to the transport infrastructure that will help to improve the public realm, and improve safety and accessibility for pedestrians and cyclists, including the provision of segregated cycle facilities</u>”</p> <p>Rationale: The policy as stated leaves open the possibility of expanding road capacity in the guise of “reducing road congestion”; in reality Induced Demand arising from such measures would likely lead to an increase in vehicles travelling and a return of congestion following an initial period of relief.</p>
N9.1	<p>New paragraph following existing Paragraph h:</p> <p>“<u>Managing and reducing the amount of vehicle traffic in Wimbledon town centre so as to reduce the levels of pollution and create a more pleasant and vibrant town centre</u>”</p> <p>New paragraph following existing Paragraph i:</p> <p>“<u>Seeking to improve the pedestrian and shopping environment in Wimbledon town centre by removing vehicle traffic from The Broadway between Queen’s Road and Gladstone Road, with vehicles re-routed via Hartfield Road</u>”</p> <p>New paragraphs following existing Paragraph q:</p> <p>“<u>Promoting and supporting 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.</u>”</p> <p>“<u>Constraining activities that are environmentally unfriendly, pollution-generating, or yield high volumes of HGV traffic in industrial estates in the Wimbledon area where the surrounding area is largely residential. Encourage relocation of activities which generate high levels of HGV movements through Wimbledon centre.</u>”</p> <p>Paragraph 9.1.30:</p> <p>More explicit support for step-free access at Haydons Road station should be stated.</p>

Policy	Comments
Site Wi3	<p>Design and Accessibility guidance should be amended as follows:</p> <p>“Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian <u>and cycle</u> access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register by AELTC (former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park”</p> <p>Rationale: The site presents an opportunity to create a new access route from Church Road to Wimbledon Park, improving accessibility to green space and creating new active travel routes to/from Wimbledon Village</p>
Site Wi16	<p>Design and accessibility guidance:</p> <p>We do not support the construction of a road bridge between Queen’s Road and Alexandra Road; we would, however, support the construction of a ramped, segregated pedestrian and cycle bridge at this location. A new road bridge would be inconsistent with the Mayor’s transport strategy to increase journeys made by foot, cycle or public transport to 80% by 2041.</p>
T16.1	<p>New paragraph following existing Paragraph b:</p> <p><u>“Develop and extend the use of Low Traffic Neighbourhoods and School Streets, working closely with local interests in the creation and evolution of schemes beforehand”</u></p> <p>New paragraph following existing Paragraph c:</p> <p><u>“Ensure that we make the most of existing and new active travel infrastructure with a planned programme of maintenance that addresses surface quality issues and cuts back overgrown vegetation that can significantly narrow routes”</u></p>
T16.2	<p>New paragraph following existing Paragraph c:</p> <p><u>“Ensure new infrastructure is of sufficient quality to achieve Merton’s active travel goals by mandating that with all new pedestrian or cycle infrastructure must meet or exceed current DfT guidance (e.g. LTN 1/20 and other such guidance that may be published during the lifetime of the Local Plan)”</u></p> <p>17.2.4: Changes to cycling infrastructure must meet LTN 1/20 or any subsequent replacement</p> <p>17.2.5: Update wording to say “Development proposals <u>must</u> maximise opportunities... “</p>

Policy	Comments
T16.2 (continued)	<p>17.2.6: Update wording to say “Development layouts must be designed to give priority to pedestrian and cycle movements and must facilitate access to public transport networks. Pedestrian and cycle routes must be provided to a high standard in accordance with the latest best practice guidance (Cycle infrastructure design (LTN 1/20)”</p> <p>17.2.7: Update wording to say: “We have adopted TfL’s healthy streets approach, which puts people’s health at the centre of how streets and public spaces are designed, managed and used. Developments will be expected to demonstrate how their proposals will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. New streets must respect and link to the local neighbourhood they serve and provide good connections to community facilities and shops, promote improved travel choice by creating an attractive, permeable, well designed and balanced environment”</p> <p>17.2.9: Update wording to say: “Low traffic neighbourhoods are local streets where through traffic is restricted to reduce car dominance and create safe and pleasant street environments that enable cycling and walking. Merton already has in place successful and longstanding low traffic neighbourhoods and streets in several areas of the borough particularly around Colliers Wood and South Wimbledon. As part of the Healthy Streets Approach, new development should adopt the principles of low traffic neighbourhoods and filtered permeability into the site layouts and to integrate with any existing schemes.”</p> <p>17.2.10: Update wording to say: “To enable more people to take up or continue to cycle it is important that a sufficient quantity of high-quality cycle parking is provided within new developments in accordance with the higher-level requirements set out in the London Plan. Cycle parking must be easy to access in a convenient location within a development, at ground level wherever possible. The facilities must be secure, covered and be suitable for people of all ages and abilities, including those who might experience difficulties in lifting a bike or need a specialist cycle. Development proposals must provide full layout drawings prior to the determination of application, demonstrating that it is possible and easy to manoeuvre bicycles both to and within the proposed cycle parking facilities. In places of employment, supporting facilities must be provided including changing rooms, maintenance facilities, lockers and shower facilities (at least one per ten long-stay spaces).”</p> <p>17.3.8: Suggested new paragraph after 17.3.8: “<u>On roads without segregated cycle infrastructure they can also increase risk to vulnerable road users and discourage people from making active travel choices.</u>”</p> <p>17.3.12: Add: “<u>Major events should additionally be required to provide cycle storage for attendees.</u>”</p>

Policy	Comments
T16.4	<p>Paragraph a:</p> <p>We would encourage Merton to be more explicit as to what constitutes “good” public transport accessibility, to remove any potential ambiguity. PTAL 5/6a/6b should be car free, in line with London Plan guidance.</p> <p>Paragraph b:</p> <p>The wording here is somewhat ambiguous; suggested alternative wording: “All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free, <u>with residents in the new development ineligible for parking permits</u>”</p> <p>17.5.16: Suggested clarification: “Where the proposed cycle network includes <u>pedestrian</u> links where cycling is currently prohibited and cyclists are required to dismount, we will <u>seek to enhance</u> the route to safely accommodate cyclists <u>and consider</u> a “share with care” approach where separate facilities are not feasible”</p>