

**From:**  
**To:** [Future Merton](#)  
**Subject:** Merton Local Plan - modifications - Merton Cycling Campaign's Response  
**Date:** 06 March 2024 15:32:25  
**Attachments:** [MertonLocalPlan\\_RevisionComments.pdf](#)

---

Please find attached a document with our feedback on the modifications.

We note that the history of this new Local Plan goes back to 2019, and there are certainly various respects in which the plan is already out-of-date. We think the approach of a "grand plan" is the wrong one for the current era; there is so much continuous change going on in various aspects - public policy, climate change, technology - that any plan will be out-of-date before it's published, especially if it takes 5 years (and counting) to get it over the line.

For example, electric bikes and scooters hardly existed for most practical purposes in 2019; now Lime bikes are everywhere, as are delivery e-bikes.

We suggest that a more "agile" approach is needed, where policies are added and adjusted in response to real-world developments. We understand that developers and other interested parties need some stable point of reference and that compliance with moving targets is difficult, but at the same time we cannot represent the real policy environment as static, and to do so risks outcomes that are less and less aligned with current reality as time passes.

Best regards.

Merton Cycling Campaign.

Merton Cycling Campaign

Comments on Revisions to Merton Local Plan, 6 March 2024

<p>MM6</p>	<p>In accordance with the London Plan 2021, Taller buildings are one form of high-density development that can be appropriate right in some the locations identified in this plan, subject to exemplary excellent design, good public transport accessibility and impact on existing character, heritage and townscape. ...</p>		<p>In addition we want to see reference made to the fact that increased density results in more pedestrian/cycle movements, so clearly the public realm needs to become less dominated by motor vehicles. New residents, who won't own cars, should be able to cycle, which requires quality cycle infrastructure. Pedestrians should be supported with adequate pavement width and crossings that prioritise their journeys. Road danger reduction is key.</p>
<p>MM9</p>	<p>By 20376 /38 Merton will have:</p> <ul style="list-style-type: none"> <li>• Be on our way Made progress towards becoming net-zero carbon by 2050 in partnership with other organisations and importantly with our residents.</li> <li>• Continued to grow the borough's low carbon and circular economy.</li> <li>• Have minimised greenhouse gas emissions and ensured resilience overheating, flooding and other the impacts of climate change</li> </ul> <p>LBM29 Schedule of Main Modifications to Merton's Draft Local Plan – January 2024 Page 4 of 165 Mod Ref. Page Plan Ref. Proposed Changes Reason</p> <ul style="list-style-type: none"> <li>• Improved community health and wellbeing and reduced health and income inequality within the borough and the disparities between the east and west of the borough</li> </ul>		<p>The wording "Made progress" has no value in our view. It is not a quantitative target; neither does it describe qualitative changes that are required.</p> <p>We recommend a firm target for carbon emissions reduction (which may be caveated for factors that are not within the Council's control).</p> <p>Other targets may also be acceptable, but they need to be specific and measurable.</p>

MM35	<p>Development should protect and enhance the existing cycle and pedestrian route. The site may be required to make provision for docking areas for cycle/ scooter hire schemes.</p> <p>TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. There is also an anticipated requirement for space to accommodate docking areas for cycle / scooter hire schemes considering the high expected demand in this location. However, there is a lack of space on the public highway to facilitate additional cycle parking. Consideration should be given to the feasibility of providing publicly accessible secure cycle parking and / or docking areas for cycle or scooter hire schemes on this site at ground level, either as part of any development or if development does not take place</p>		<p>This seems vague and under-ambitious. The wording "<i>there is a lack of space on the public highway to facilitate additional cycle parking</i>" has a baked-in assumption that all the highway space currently used for motor vehicle movement and parking (and there is a lot of it) will continue to be so used. Such an assumption does not belong in this document.</p> <p>Wording such as "<i>Consideration should be Given</i>" pretty much guarantees that it won't happen: we prefer a much clearer duty to provide cycle parking. If cycle parking isn't increased very significantly then requirements elsewhere in the document to increase cycling become unachievable.</p>
MM40, MM49			<p>These are largely duplicates of MM35 and would best be references to avoid confusion.</p>
MM106	<p>Supporting the redevelopment at South Wimbledon station (Site Allocation Wi8) which respects and enhances the Grade II listed building and other heritage assets within the area, delivers a range of benefits including encouraging a public space, cycle</p>		<p>The "reason" includes the statement that "<i>opportunities to promote walking, cycling and public transport are identified and pursued</i>"</p> <p>This area and the junction is highly polluted (one of London's pollution hotspots) and hostile for cycling and walking. The benefits of this scheme must include</p>

	parking, improved station facilities and secondary pedestrian entrance to the underground station off the busy main roads.		addressing the dominance of motor traffic, prioritising of cycling and walkin, and reduction in pollution. Just providing cycle parking and a public space isn't enough. The word "encouraging" we feel is too vague. Again, there's a baked in assumption here that "busy main roads" are an immutable feature of this location. This assumption is not compatible with promoting walking/cycling or indeed public transport - we note that buses are often held up at this location due to the constant congestion and inadequate bus priority measures.
MM108	Securing improvements to public transport and(AM159) investment in Wimbledon station to improve the passenger experience and reduce severance with new bridges over the railway. Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.		The Plan should not only ensure improvements to public transport, but also to cycle provision which is notably lacking in central Wimbledon, which is dominated (as noted in this same section) by motor traffic. The gyratory system is particularly disadvantageous for cyclists, forcing longer journeys and raising road danger.
MM146	... priority should be given to affordable housing and necessary public transport improvements		We recommend this be changed to "public transport and active travel (cycling and walking) improvements"  This also applies to MM287.
MM180	We consider the most appropriate sites for student accommodation proposals to be well connected locations with good levels of access to public transport (PTAL 4 or higher) including those supported by good walking and cycling infrastructure and where student residents have access to a wide range of services and facilities		The wording implies that only sites with existing good PTAL/walking/cycling infra are appropriate for student accommodation. A key goal of the Plan must be to raise standards of PTAL/walking/cycling infra, indeed this is specified by MM329 and Policy IN 14.1, so the wording here is not consistent with that policy. We suggest that the wording be changed to include wording

	<p>within a 15-minute walking distance. Such proposals are also supported where the development is capable of having good access to public transport and facilities as a result of proposed transport improvements. It is considered that applicants should give priority during the site selection process to locations in proximity to the institutions that the development will serve.</p>		<p>such as:  “The council shall ensure that sites selected for student accommodation are served by good, safe walking and cycling infrastructure and public transport, by improving the infrastructure as needed, in alignment with the Cycling, Walking and Kerbside Strategy (and/or other future relevant documents that may be issued).”</p>
MM222	<p>TfL’s London Cycle Design Standards provides guidance for the design of dedicated cycle infrastructure.</p>		<p>Note that LTN 1/20 also applies. There may also be additional standards and guidance that are introduced during the lifetime of the Plan so we recommend that the wording reflects that the cycle infrastructure (and the public realm in general) be designed in accordance with best-practice and with the latest standards and guidance, to ensure the longest design life/avoid future rework. See also MM325.</p>
MM223	<p>Communal amenity should be multifunctional; designed for playing, socialising and relaxing and if outdoors, be green and biodiverse. They should provide sufficient space to meet the requirements of the number of residents. There may be cases where the optimisation of sites may impact the quantum of communal amenity achievable. This will be considered on a case-by-case basis. Flexibility may be applied if developers successfully demonstrate that the amount of amenity space provided is acceptable, taking into account factors such as the character of the area, access to public open spaces and the</p>		<p>Communal amenity often has a “movement” function: permeability is important so that pedestrians and cyclists have direct routes out of a development, and are not forced to use busy roads, indirect routes or to go round 3 sides of a development to gain access.</p>

	<p>quantity and quality of private amenity spaces. In these cases, the quality of any communal space will need to be high.</p>		
MM298	<p>d. Support the protection and completion of the Wandle Trail, as shown on the 'Wandle Trail / National Cycle Network Route 20 (NCN20)' Policies Map and the Indicative Cycle Network' Policies Map.</p> <p>15.6.10 While most sections are in a good condition, there are some sections missing links and areas that will require future investment and improvement to enable a continuous trail that is fully accessible to all users, at all times of the year. We support the protection and completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield (refer to Policy Maps 'Wandle Trail / National Cycle Network Route 20 (NCN20)' and 'Indicative Cycling Network' and Table 16.1). This includes the currently inaccessible section from Trewint Street to Ravensbury Terrace. This will complete a missing link, and provide a safer, quieter and more pleasant alternative route for cyclists and pedestrians to the busy Durnsford Road bridge. Completion of the Wandle Trail missing link will involve joint work between the boroughs of Merton and Wandsworth, the Environment Agency and National Rail, supported through Section 106 contributions already secured,</p>		<p>The wording "<i>fully accessible to all users, at all times of the year.</i>" sets a high bar. While improvements have been made recently to install sealed surfaces, there are still sections that do not have smooth sealed surfaces (particularly in Ravensbury Park and further south), and there is a lack of lighting on all sections south of Merton High Street.</p> <p>Smooth sealed surfaces are important to avoid excluding disabled users, especially in winter when the path becomes wet and muddy, and lighting is important particularly for women and others who may not feel safe in a dark environment.</p> <p>If the Plan is not going to address these issues then the path won't be fully accessible, and in that case an alternative, fully-accessible route should be provided.</p>

	<p>other funding sources and the provision of access routes already secured through adjacent development sites. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access</p>		
MM323	<p>Encourage the management of vehicle use and parking to improve <b>road safety</b> outcomes and, reduce traffic dominance and minimise impact on the transport network</p>		<p>The term "road danger reduction" is preferred over "road safety" as the latter implies casualty-count reduction, which can result in exclusion of vulnerable road users from areas, rather than actually reducing danger. The "road safety" approach leads to excessive use of guard rail, underpasses/overpasses, indirect pedestrian/cycle routes, rather than addressing the causes of danger. (The term is also used elsewhere in the doc.)</p>
MM328	<p>...There are pleasant, traffic free walking and cycling routes though the Borough's parks and open spaces that enable active travel choices by connecting key destinations via convenient shortcuts. In particular the Wandle Trail provides a major active travel route across the borough that connects neighbourhoods including Morden and Colliers Wood. It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads. We will work with Transport for London, developers and other partners to make further</p>		<p>The statement that cycling provision is "not of adequate standard in all areas" is misleading because the standard is <b>generally inadequate</b> and not up to LTN 1/20 or LCDS standards (with a few exceptions).</p> <p>We find it odd that "severance created by busy roads" is the only barrier to cycling that is called out here. Of far greater significance are the lack of continuous, safe cycle routes, the dominance of motor traffic in many residential areas, the lack of segregated tracks on main roads, and the lack of a continuous network.</p> <p>A huge barrier to the use of routes across parks and open spaces (and also elsewhere) is the presence of chicane barriers, which make cycling slow on standard cycles, and impossible on non-standard cycles in many cases. Such</p>

	<p>improvements over the plan period with the aim of providing comprehensive cycling and walking networks that enable active travel choices to be made. In order to contribute to the aim set out in the Government's decarbonising transport strategy, to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies in 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period</p>		<p>barriers are not Equality Act-compliant and exclude many disabled users. Merton has an unusually high density of such barriers compared with other boroughs.</p> <p>We feel these points should be specifically mentioned, because they are major impediments to active travel choices and must be addressed. We should not mislead on the amount of work the Council needs to do to raise the level of cycling provision to an acceptable standard.</p>
MM330	<p>...Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will be resisted not be permitted.</p>		<p>The issue is not only access, but permeability. We would like to see a specific requirement for permeability for active travel i.e. cycles and pedestrians should be able to travel through a development at all times.</p>
MM338	<p>Developments should provide the minimum level of car parking necessary taking into consideration the site accessibility by public transport (PTAL), in accordance with London Plan parking standards...</p>		<p>Need to be clear what "necessary" actually means. "Necessary" should represent a very high bar. Just being in an area of lower PTAL should not, for example, make car use necessary. We suggest that there are no parts of the borough where car ownership is an absolute necessity for day-to-day life. To be clear: in most areas there is plenty of choice of premises for those who actually require (or desire) a car or van. Therefore, it is not necessary to increase the number of such premises.</p>
TOPICS			



13. Sustainable transport	b. Number of registered electric vehicles (EV) in Merton annually.		<p>[Note that private electric vehicles are not sustainable for a number of reasons, so don't belong in "sustainable transport", but it appears that in the Plan there is indeed a separate section for EVs.]</p> <p>The absolute number of EVs can't be the only indicator: we need both a target to increase the <i>percentage</i> of registered vehicles that are pure-EV, and a target to <i>reduce</i> the total number of registered vehicles.</p> <p>Also note that not all EVs are the same. A large SUV is more damaging than a small car.</p>
---------------------------	--	--	---