

Merton Cycling Campaign's response to LB Merton's LIP3 Consultation

April 2019

Executive Summary

Merton Cycling Campaign is the local group of the London Cycling Campaign, working to encourage more people to use active and sustainable forms of transport.

While the foreword of the LIP includes encouraging statements about reducing vehicle journeys, discouraging drivers from using cars and support for Vision Zero and claims the LIP “focuses on delivery of tangible improvements for walking and cycling” the actions and targets set out fall far short of delivering against this. The LIP3 also proposes developing features that directly or indirectly promote cycling, including the highly desirable Borough-wide 20 mph. Other features promoted as formal ‘Objectives’ are Liveable Neighbourhoods, Cycle-parking (including on-street ‘hangars’), Cargo-bike deliveries, Hire Bikes, Vision Zero and Bicycle training. A Healthy Streets Policy and Permeability are mentioned as desirable.

However MCC is concerned that the LIP as drafted does not comply with TfL’s requirements for this document. There is little in the LIP3 in terms of practical actions or programmes that demonstrate how Merton will reach the ambitious goals set out in the Mayor’s Transport Strategy, and what proposals there are are lacking in ambition.

TfL’s analysis of cycling potential suggests 41% of all daily trips made by Londoners are potentially cycleable, with 55% of these in outer London boroughs. Merton’s current plans will not unlock this potential – a more radical approach is needed.

The targets set fall significantly short of MTS requirements with just a 5% fall in vehicle km (against a mayoral target of 10-15%, with the largest reductions needed in outer London boroughs such as Merton). Likewise, just a 5.5% reduction in car ownership is forecast by 2041 – again this seems unambitious for a borough where car ownership is above the London average.

There is a particular lack of ambition in the list of “cycling-related infrastructure that could be developed”. This includes a crossing that would require cyclists to dismount and a series of shared use paths. Shared paths provide a poor experience both for those cycling and those walking. They are generally only a good solution where low numbers of pedestrians are expected – i.e. they are a poor solution in London.

We acknowledge that funding is limited but additional funding for ambitious projects is available through TfL’s Liveable Neighbourhoods programme. The LIP needs to be revised to include:

- More ambitious targets for reduction in car ownership and driven km
- A commitment to protected space for cycling on main roads within the borough
- Reprioritisation of funding to create low traffic neighbourhoods, focussing on areas with a high concentration of schools.
- Development of a larger high quality Liveable neighbourhood bid

Below we set out our more detailed comments on the proposals within the draft LIP3 and look forward to these being addressed in future drafts.

20 MPH -The Borough-wide 20mph is to be delivered by 2022 for a budget of £530k; whether this budget is adequate seems doubtful. The Wimbledon Town Centre 20mph zone/limit is disgracefully understated and consequently ineffective.

TARGET SHORTFALL -£530k is also proposed for ‘Cycle Routes’ by 2022. During the same period, in fact by 2021, the Borough’s Delivery Indicator target is to have 29% of residents within 400 metres of safe and pleasant cycle network [Borough outcome indicator targets STO7 item 1b page 81 of LIP]. In 2016 the Merton percentage is given as 3% so this requires an uplift of 26%. It

seems unrealistic to think that this can be achieved for £530k when the Croydon Road/Beddington Lane is costing more and the characteristic that makes this figure itself low in cost/kilometre is that the number of residents within 400 metres is zero.

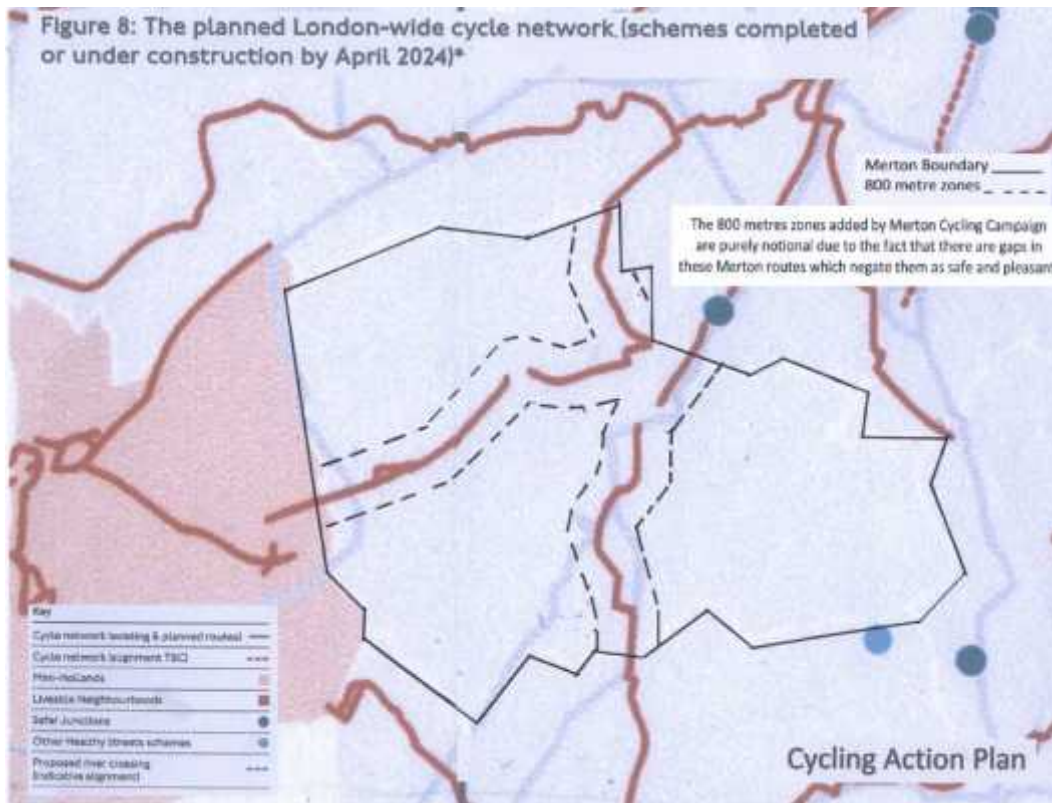
By 2041 Merton's target is to have 50% of residents within 400 metres of safe and pleasant cycle network. Merton's LIP3 gives no indication of how Merton intend to achieve this initial 26% uplift or the further uplift to 50% and although there is a heading 'Borough cycling programme' included in the list of LIP budget allocations, no spending at all is proposed. Given that each Borough's LIP 3 is required to provide a list of potential schemes up until 2041 (mandatory requirement 16 of the LIP guidance), to have no expenditure on a Borough Cycling Programme suggests that outcome indicator targets will not be met.

CIRCULAR PROPOSALS -Merton's Local Plan 2020 in Section 6.4 has a map of extensive 'Potential cycling infrastructure improvements', but these are not referred to in LIP3. Item 3.27 of LIP3 Merton's Air Quality Action Plan 2018-23 is referred to as including 'a number of specific actions to reduce emissions from road transport'. The main action described is to deliver a programme of installing bicycle infrastructure and carrying out a borough-wide cycling network audit to review and update the network.

In detail; Action 25 of the Air Quality Action Plan is 'Carry out a borough-wide cycling network audit to review and update the network. (informed by TfL's Cycling Infrastructure Database (CID), which contains all cycling infrastructure assets in London)' and Action 26 is a 'Programme of installing bicycle infrastructure'. The Air Quality Action Plan then refers to Actions 25 and 26 as being dependent on the LIP. As, critically, the LIP does not include these amongst the 'Borough Objectives' (Page 27) this absurdly and circuitously succeeds in making Action 25 and 26 null and void.

It is here that we see the big gap between the very minor cycling interventions currently programmed for implementation in the LIP and the extensive action needed to deliver Merton's worthy cycling Delivery Indicator targets.

DISCONNECTED QUIETWAYS ONLY -The Cycle Action Plan's Strategic Cycle Network proposals for Merton by 2024 (see Extract map below with notes by Merton Cycling Campaign) give some indication of the shortfall that Merton's LIP should be highlighting if it is to get anywhere near its targets, bearing in mind that by 2021 Merton aims to offer 29% of residents a safe and pleasant cycle network within 400 metres of their home. This shows the Mayor's Strategic network 'pipeline projects': Clapham Common to Wimbledon by 2020 and Colliers Wood to Sutton via Morden by 2024, and the Kingston connection, rebranded as 'pipeline projects' from 'Quietways'.



CORE FOCUS MISDIRECTED -Despite this obviously inadequate coverage of any safe and convenient network Merton proposes that a 'core focus' of their LIP is to better connect Merton's network of green spaces, parks and others places to cycling by upgrading existing facilities. This is illustrated in Fig.10 [in the LIP] 'Potential Cycle Paths' which is composed of 4 or 5 relatively random adjustments to green space on a map which is filled out mainly with other adjustments of the last three years either completed or in the process of completion.

The map of potential cycle paths [appendix fig 10] shows only a few short, disconnected, sections of route through green spaces. This bears little relation to the map of extensive 'Potential Cycling Infrastructure Improvements' in Merton's Draft Local Plan 2020, and less than 13% of the LIP budget is actually allocated to Cycle Routes. Appearing almost as an afterthought the 'core focus' includes bringing together a connected network of dedicated cycle paths and routes linking local places and public transport facilities supported by cycle-parking facilities. This is therefore not limited to green space, and sounds more like a Council which, elsewhere in this LIP, says it is keen to promote more cycling and to optimise cycling potential in the borough especially around town centres and other areas with good connectivity by public transport.

NO PROGRAMME -However, this LIP does not have a programme for delivering a safe and pleasant local cycle network that might satisfy these requirements.

The Cycle Action Plan says that the Mayor's office will look for boroughs to develop ambitious plans and says that TfL will provide funding and support to deliver local cycle networks and neighbourhood improvements for cycling. The LIP guidance asks boroughs to set out how they will contribute to growing the London-wide cycle network through their LIPs.

If Merton is serious in saying it is 'keen to promote more cycling and optimise cycling potential' it definitely needs a LIP that prepares the way for more, and properly targeted, funding. It should demonstrate an argument that for a safe and pleasant cycle network across the Borough a programme of installing bicycle infrastructure is needed in line with Merton's Air Quality Action Plan Action 25 & 26. Without such a programme, when the LIP claims that 'providing more and better-quality cycling infrastructure will help make cycling, easier, safer and more convenient as well helping to open up places, historic sites and public transport to everyone', these are just empty words.

INADEQUATE PROPOSALS FOR ‘INFRASTRUCTURE SCHEMES’ -Item 5.40 of the LIP lists ‘Cycling related infrastructure schemes’ and suggests that there are others, but these (listed below) are the total included in the LIP. Merton Cycling Campaign has arranged them in an order that might prove logical if a Borough cycling infrastructure delivery plan existed. But this limited list, although welcome, reflects a LIP that is not backed by a conscious programme of installing bicycle infrastructure. So the LIP3 list displays a markedly inefficient way of meeting delivery targets.

- *The pedestrian phase at Windmill Road/Croydon Road junction.* This is claimed to complete a ‘cross-borough route’ but it is purely a disconnected section that crosses the Borough boundary with Sutton.
- *Commonside West – shared-use path on town green.* [LIP Fig.10 Potential Cycle Paths]. This is an important link in creating the real ‘cross-borough route’ of the previous item. If programmed as such it would then be benefitted by Merton’s Liveable Neighbourhood scheme if the Western Road Corridor option is chosen.
- *Lavender Park (Western side) path upgrade and potential widening* [LIP Fig.10 Potential Cycle Paths]. This also relates to the two items above being potentially part of the same cross-borough route, if programmed for interconnection as such. There is no mention of it being converted to shared-use.
- *Figges Marsh-Widening of existing path and conversion to shared-use* [LIP Fig.10 Potential Cycle Paths]. This in isolation appears not to be part of any wider connectivity strategy.
- *Path Improvements between Whatley Avenue and Grand Drive* [LIP Fig.10 Potential Cycle Paths]. This could be part of useful extension of the Colliers Wood to Wimbledon Chase Quietway.
- *Bushey Road (just west of junction with Martin Way) Convert footway to shared-use path.* This is necessary to complete the Bushey Road shared-use path, and may have some justification in relation to the Quietway of the item above.
- *Bushey Road Toucan crossing.* This could be beneficial if programmed as part of a Raynes Park/Morden connectivity strategy.
- *Extend the path from New Malden to Raynes Park via West Barnes Lane.* This completes Kingston’s ‘Mini-Holland’ link to Raynes Park, although to continue cycling through Raynes Park requires engineering works.
- *Cannon Hill Common – Introduce a shared-use path across the common.* We have highlighted the inadequacy of LIP Fig.10 ‘Potential Cycle Paths’, but as a green space connection this might be expected to be on it.
- *Introduce wheeling ramps across various footbridges.* This is of benefit to standard bicycles, but not to non-standard bicycles.

NO GROUNDWORK FOR CYCLING -In his forward to the LIP, the cabinet member for regeneration, housing and transport says that to get more people active, to reduce air pollution and to promote healthier lifestyles, the council intends to prioritise the delivery of improved walking and cycling facilities. To this, he could have added that cycling also improves productivity and gives freedom to travel cheaply. However LIP3 seems to favour interventions which it says ‘discreetly nudge people’s behaviour ... indirectly promoting’ the benefits of walking and cycling. The Objectives for Car clubs and Electric vehicle charging points come into this category. There is no provision for, or encouragement to people on/immobility scooters, wheelchair tricycles, wheelchairs, e-bicycles, electric assisted delivery cycles and tricycles to recharge their vehicles, when there are clear Public Health gains to be made by encouraging more activity. There is no technical reason that these important and growing users and uses are ignored in the charging points programme.

The admirable Objective for borough-wide 20mph, if enforced, will inevitably be a welcome, less discreet, nudge. There are Objectives specifically for cycling included in the LIP e.g. cycle parking, bikeability training, hire bikes and cargo-bike deliveries, but there is no formal Objective to directly prepare the ground for these cycle amenities. Objective LO5 says Merton Council will work to deliver an expanded cycle network, but this is in the profoundly insubstantial form of Fig.10 of the LIP, titled ‘Potential Cycle Paths’.

LIP3 lacks a formal Objective of providing a safe and pleasant Borough cycle network backed by a current and longer-term delivery plan.

CYCLE NETWORK QUALITY

Merton's LIP3 not only needs to define a Cycle Network Infrastructure to meet its targets but also needs to sign up to the recognised quality expected, i.e. a safe and pleasant Borough cycle network to Continental standards, which:

- is safe and pleasant end to end (borough boundary to borough boundary); (one criterion for 'pleasant' is to have a good well-maintained surface without puddling and without chicane barriers)
- conforms to the latest London Cycling Design Standards.
- conforms to the Cycle Action Plan's Six New Quality criteria for cycle routes.