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MERTON COUNCIL LIP CONSULTATION April 2019

GENERAL:

- FIG 4 DOESN'T SHOW CORRECT ROUTE OF THAMESLINK FROM WIMBLEDON TOWARDS TOOTING AND BEYOND
- FIG 7 DOES NOT MARK WIMBLEDON TO RAYNES PARK TO NEW MALDEN AS A POTENTIAL ACTIVE TRAVEL CORRIDOR
- FIG 10: HUGELY UNAMBITIOUS. ALL MAJOR ROADS SHOULD HAVE POTENTIAL FOR PROTECTED CYCLE LANES.
- DISAPPOINTING THAT MCC IS NOT ON LIST OF NAMED CONSULTEES

I think Merton Council should seek ongoing expert input from a cycling champion/expert/consultant. I note:

"2.45 In order to meet the overarching target that 80 percent of trips to be made by active, efficient and sustainable modes by public transport, walking and cycling by 2041 will require a wide-ranging change in policy and delivery approach as to how we manage and operate the highway network to promote the necessary shift to sustainable modes."

This "change in policy and delivery approach" is not apparent in the document produced for consultation here, which lacks ambition, vision and commitment.

This document also states an intention to prioritise delivery of improved walking and cycling facilities, encourage people to lead healthier lives and to reduce air pollution, particularly in the more congested parts of the borough. This is not reflected in the objectives, which are largely vague, non-committal and are likely therefore to be ineffective.

If the Local Implementation Plan wants to deliver tangible walking and cycling improvements across the borough, measures to achieve this will need to be properly identified and funded. They are not.

I would like to see this document make a stated commitment to providing properly protected space for cycling **on all main roads**, especially since Merton Council is the Highway Authority for the majority of roads in the borough.

Why? 2.38 *"...the fear of road traffic remains a significant deterrent for many potential (cycle) users..."*

Please consider my further comments under the following headings with some specifics beneath each:

CYCLING FACILITIES

- Protected cycle lanes throughout the borough in every direction
- Guaranteed facilities for cyclists in every new development: secure parking, showering and changing facilities, storage for bikes and cycling equipment/clothing

- Lots of cycle parking - secure on-street parking near people's homes, visitor parking near shops and secure parking at stations, schools, offices, council buildings, community facilities

Every time a development requiring highways changes is submitted/approved, it should be an enforced condition that protected space for cycling is provided, proper cycle parking/safe storage is provided, and in the case of a business/office development that shower/changing facilities are provided for those wishing to travel to work by bike. This will be critical, particularly if Merton has the ambition to attract top-level businesses to eg a made-over Wimbledon town centre.

This might help improve the level of cycle commuting that takes place in Merton (currently – apparently - a pitiful 2.4% of trips) as well as: 2.35 *“the modal share of walking, cycling and public transport is around 58 percent showing a worrying falling trend”*.

It would help if planning/transport officers and PAC members were regular commuter AND leisure cyclists or took advice from those who are.

Remember that not all cyclists want to cycle a meandering, slower quietway: cyclists commuting to work generally want a faster, more direct, on-road route. Quietways are better suited to leisure and/or less experienced cyclists: they will be travelling more slowly and thus also mix better with pedestrians. Mixed-use paths/routes that are properly devised and signed should be encouraged.

A detailed, ongoing plan for a cycle network based on TfL's Strategic Cycling Analysis and a commitment to enough routes to fulfil the MTS commitment that 70% of residents live within 400m of a strategic, high-quality route is required.

“ 5.55 To support increased cycling the council is continuing to provide more cycle parking facilities, including non-standard cycle facilities and redesignation of road space in areas of high demand.”: What do you mean by 'high demand'? Build them and cyclists will come! YOU need to drive demand.

We are lucky in Merton, in that every resident lives within 10-minutes bike ride of a town centre. It should be a council goal to ensure that from anywhere in the borough, a person wishing to cycle to the nearest town centre should be able to do so safely and easily. Electric bike hire will help in areas such as Wimbledon where the hills are a deterrent.

3.42 MTS Policy 3, proposal 9 (a): Road safety is the main concern for cyclists and indeed potential cyclists. Previously the council has rolled out a programme of area wide 20mph zones with traffic calming measures to physically reduce vehicle speeds, as well as localised 20mph speed limits outside schools. The best way to achieve better safety for cyclists is to provide protected cycle lanes. Simply expecting cyclists to do Bikeability then survive on fast, aggressive, congested roads is not sufficient.

CYCLE HIRE SCHEMES

- in town centres
- dedicated drop-off bays
- electric bikes
- last-mile/cargo bikes

Council should be taking positive steps to encourage bike hire schemes, using all the above. Electric bike hire with a big promo should be carried out. E-bikes are great fun and perfect for older people.

Why not offer empty shops at low or zero rent to make this happen? Especially in less affluent areas where people are perhaps reluctant cyclists.

COMMITMENT TO REDUCTION IN TRAFFIC VOLUMES

- identify neighbourhoods for reduction in traffic volumes
- re-engineer dangerous junctions
- adopt 'school streets' policies in as many places as possible
- actively promote non-car use

Identify specific named neighbourhoods (throughout the borough) where there is a commitment to reducing traffic volumes and re-allocating space from motor vehicles to other modes. This might be via designation as "low traffic neighbourhoods", with area-based traffic reduction measures.

Redesign junctions in favour of walking, cycling and safety with traffic calming measures to ensure low speed entry to junctions, engineer out "splayed" or "flared" junctions (an example of this would be **the junction of Haydons Road and Queens Road SW19**), favour continuous pavement" or "blended crossing" treatments on side streets (eg **Haydons Road/Haydon Park Road junction**) to support walking and discourage speeding as well as illegal entry by over-weight vehicles.

SNAP plans should be brought in swiftly and widely. Talking about just one school per year shows utter lack of ambition or need for urgency in face of a public health emergency (pollution and childhood obesity).

Road closures in "**School Streets**" **should be the norm**: timed road closures around schools at drop off/pickup times. This would not only improve safety of pupils but would also deter parents from doing school drop-off by car, as well as deter people who live near schools but 'commute' their child to a more distant school by car. School admissions criteria should make it clear that if your child cannot arrive by sustainable means (on foot, by bike or via public transport), any application for a place will be frowned upon.

Private schools should be forced to demonstrate how they are encouraging sustainable pupil travel, discourage them from driving, encourage car shares etc. Students too should be educated in why it's better NOT to travel by car.

This statement at “3.57 *Although this can only be accomplished if the public are presented with realistic alternatives that recognise the short comings, gaps in public transport provision and individual lifestyle choices. This means that in the short term the car will continue to play a major role. This is especially true for **cross borough trips** and in areas poorly served by public transport*” is depressing as it suggest Council is resigned to the fact that ‘car is king’ attitude cannot be shifted. Why do cross-borough trips have to be by car? I always use a bus or my bike or a tram. Not difficult!

PARKING

- emissions- and size-based charging for all parking incl in CPZs
- workplace parking levy for all businesses
- huge rise in price for second, third etc resident parking permits per household
- greening in CPZ area streets

Current plans to increase the cost of resident parking permits are unfair and ineffective: they will have no effect on desire or need for a first permit and no effect on air quality or traffic volumes. Emissions-based charging is however fair and would encourage move away from most polluting vehicles. Larger vehicles too should be charged more as they take up more space. Why does a huge Nissan Navara parked in my street that overhangs both ends of a parking space pay the same amount as a tiny Fiat 500? If Council goal is to reduce amount of roadside space consumed by vehicle parking, it should address these issues.

Parking permits for every vehicle after first per household should be prohibitively expensive, I note: “2.34 *an increase in households with 2 or more cars (up to 18.6%)*”

Where CPZs exist, effort should be put into transforming the look of these streets, through introduction of parklets, greening and planted beds, and support for volunteer-based street greening schemes: “2.48 *Redefine the way our streets are laid out and used so as to encourage the take-up of more active and healthier lifestyles where people feel confident to walk and cycle in safety*”.

HGVs and FREIGHT TRAFFIC

2.47 *Increased pressures for limited road space will need us to allocate space in a different way to meet often opposing demands and **to accommodate freight and servicing needs***. What does this even mean? Should be discouraging freight vehicles, especially HGVs, in areas that are increasingly residential, such as Plough Lane, Haydons Road North areas. Last mile and cargo bike deliveries should be

favoured. Doing so will also help encourage more people to walk and cycle as roads will be less threatening.

3.55 Similarly, where highways proposals are brought forward, consideration will be given to incorporating within the design the needs of existing freight activity to reduce the impact on other road users. I hope this means freight users will be forced to behave better, obey speed limits, stay off residential streets and respect vulnerable road users.

WANDLE TRAIL/PLOUGH LANE AREA

- Immediate and specified action needed to protect and extend Wandle Trail as recommended off-road shared route for pedestrians and cyclists.
- Limit further industrialisation of this area given the increasing residential nature with thousands of new homes in former brownfield sites, including vulnerable people such as children.
- Take a tough line on HGVs: ensure they obey rules on speed, emissions, no-idling, restricted weight residential roads

Ensure streets are safe for cyclists and pedestrians: at present, they are not both from traffic and air quality.

Outcome 1: London's streets will be healthy and more Londoners will travel actively

LO1: Develop a School Neighbourhood Approach Pilot (SNAP) bid during the first year of LIP3 to promote a cleaner environment and healthy lifestyles to help tackle physical inactivity and obesity in children. **SNAP PROGRAMMES SHOULD APPLY TO ALL SCHOOLS IN THE BOROUGH. ALL KIDS COUNT. ALL PARENTS CAN BE EDUCATED AND ENCOURAGED TO CHANGE HABITS;** this should start from early years to ensure the message is embedded from day one

LO2: Through the Local Plan and in partnership with TfL and Wandsworth continue to develop solutions to fill the Wandle Trail missing link, including new bridge across the River Wandle to Trewith Road. **FOCUS ON DIRTIAL USES IN THIS AREA, REDUCE HGV TRAFFIC AND PROTECT PEDESTRIANS**

LO3: Through its spatial policies the council will better control the impact of car growth and parking in new development, especially around areas with good connectivity by public transport. **DON'T JUST BETTER CONTROL IT: LIMIT IT! WITH FIXED TARGETS!**

LO4: Merton Council will work with TfL and neighbouring boroughs to bring forward a borough wide dock-less style cycle scheme possibly, including a trial of **e-bikes to recognise potential barriers posed by longer travel distances in outer London.** **BRING IN AN E-BIKE TRIAL FOR TENNIS FORTNIGHT. EXTEND IT RAPIDLY TO KEY SPOTS EG WIMBLEDON HILL, MORDEN**

LO5: Merton Council will work with land owners, developers, Mitcham and Wimbledon Common trustees, National Trust, Park Friends and other internal and external stakeholders to deliver an expanded cycle network across the Merton borough. **ADD IN THE WANDLE TRUST. REMEMBER THAT THIS WILL GENERALLY APPLY TO QUIETWAY/GREENWAY ROUTES: URBAN CYCLISTS**

ALSO REQUIRE HIGH QUALITY PROTECTED CYCLE LANE PROVISION ON ROAD.

LO6: When development proposals for new educational facilities or school are submitted to the council; there will be a requirement for the new development to achieve a minimum bronze standard (STARS). NO COMMENT

LO7: The council will use the schools STARS programme and Bikeability training programme to encourage more walking and cycling. **BIKEABILITY ALONE IS INSUFFICIENT: CYCLISTS NEED A SAFE ROAD INFRASTRUCTURE.**

Outcome 2: London's streets will be safe and secure

LO8: Seek to deliver a borough wide 20mph speed limit over the period 2018/2019 to 2021/22. **YES!**

LO9: Undertake annual reviews of its on-going a road safety and danger reduction programme so that those locations with the worst record are treated first with an emphasis on vulnerable road users full filling our Vision Zero Commitment. **NB NOT ALWAYS THOSE WITH A POOR RECORD THAT REQUIRE ATTENTION.**

LO10: Through its spatial policies and planning process the council will encourage development that promotes good design and natural surveillance with clear exit routes. NO COMMENT

LO11: seek to Investigate and implement the most effective engineering and educational measures to reduce casualties on our roads, particularly those impacting on vulnerable road users and children. **WHY NOT JUST IMPLEMENT THEM?**

LO12: Aim to improve the safety and confidence of all those wishing to travel actively through the take-up of cycle and pedestrian training initiatives for adults and children. **AND BACK UP WITH SAFE ROUTES THEY CAN USE CONFIDENTLY ALSO EDUCATE DRIVERS AND IMPROVE SIGNAGE**

LO13: The council will promote and encourage the adoption of safer vehicles through its contracts and procurement processes NO COMMENT

Outcome 3: London's streets will be used more efficiently and have less traffic on them

LO14: Support the growth of car clubs, where this can be delivered in a managed way to facilitate the doubling of car club membership to around 10,000 members by 2022. NO COMMENT

LO15: Merton Council will refresh its staff travel plan and potential of using car club vehicles as an alternative to staff using their own vehicles (grey fleets) as well as by health providers and local businesses to reduce car trips. **WORKPLACE PARKING LEVY SHOULD APPLY TO ALL EMPLOYERS INCLUDING THE LOCAL AUTHORITY. COUNCIL SHOULD PROVIDE BIKES FOR STAFF TO USE DURING WORKING HOURS, TRAINING AND INCENTIVES EG PAY PER MILE OF USAGE**

LO16: The council **proposes to realign its spatial policies** in accordance with the MTS, Draft London Plan and sister documents as they are published. This will support the adoption of more stringent parking and cycling standards aimed at reducing car ownership. **HOW ABOUT COUNCIL WILL ADOPT THESE RATHER THAN JUST ALIGN**

LO17: The council will investigate requests for new CPZ's or extensions to the hours of operations for existing CPZ's where petitions are received. **BUT ACCOMPANY**

THIS WITH GREENING/STREET REDESIGN INITIATIVES

LO18 - The council will look favourably on supporting last mile delivery schemes using active modes where a convincing business case can be presented. **BE MORE POSITIVE AND MAKE IT HAPPEN. PROVIDE SPACE AND IMPETUS**

Outcome 4: London's streets will be clean and green

LO19: Work with TfL and partner operators to ensure that 85% of all households are within 800m or 10 minute walk of a publically accessible charge point by 2020/2021.

THIS IS TOO FEW AND TOO FAR FOR MOST PEOPLE. NEED A FEW CHARGERS EVERY FEW 100 YARDS, ON EVERY STREET

LO20: The council **will explore opportunities** to limit engine idling through driver education, health and air quality initiatives and enforcement/action days. **WEAK!**

LO21: The council will work towards ensuring all charging infrastructure accommodates a pay as you go (PAYG) option, including for infrastructure that falls outside the Alternative Fuels Infrastructure Regulations. **WHAT DOES THIS EVEN MEAN?**

LO22: To help improve air quality and reduce impacts of traffic congestion the council will explore the potential for emission-based parking charges and work place parking levy to deliver Sutton Link. **JUST DO IT!**

LO23: The council will seek to retain existing trees where reasonably possible. Where trees are lost a suitable replacement approach should be set out that reflects the size, value and condition of the trees lost. **WEAK! WE WANT AS MANY TREES, MATURE, BEAUTIFUL TREES, AS POSSIBLE**

LO24: The council will promote the use of sustainable drainage systems (SuDS) and features as part of transport improvements in the borough. **GOOD: CAN WE HAVE SOME AROUND PLOUGH LANE/HAYDONS RD NORTH AREA PLEASE**

LO25: The council will use the planning system and its spatial policies to secure charging infrastructure on private land and in new development **NO COMMENT**

Outcome 5: The public transport network will meet the needs of a growing London.

LO26: Work with TfL's bus priority team to bring forward and deliver proposals for bus priority measures as part of a reconfigured Figges Marsh junction redesign by the end of 2020. **HAVE BUS PRIORITY MEASURES EVERYWHERE**

LO27: Review and upgrade taxi standing facilities by 2021 **ENFORCE ANTI-IDLING**

LO28: The council will support TfL to trial the introduction of demand responsive bus services

LO29: We will work with TfL and other transport operators to improve bus connectivity in areas with low PTAL scores and/or potential for growth.

LO30: The council will work with TfL to enhance orbital and crossborough bus services that provide residents improved access to employment and local services

LO31: The council will work with train operators and Network Rail that the frequencies of services meet demand.

LO32: The council will lobby TfL and London Mayor to accelerate the rollout of electric or hydrogen buses in outer London.

LO38: The council will work partners and developers through the planning process to

identify and lobby for the provision of step free facilities at stations in the borough, including Raynes Park and Motspur Park Stations **THIS SHOULD ALSO INCLUDE HAYDONS ROAD STATION AND WIMBLEDON CHASE STATION**

LO41: To use the planning system to encourage major new development to explore wider health issues associated with the local built environment, transport and air quality **YES AND ENFORCE IT**

LO42: To help mitigate transport impacts on the highway network during construction, where appropriate new development will be required to prepare a Construction and Logistic Plan in accordance with TfL's guidance (date July 2017-v3.0 or later). **AND ENFORCE IT**

LO43: To use spatial policy and the planning system to ensure that new development promotes health streets principals into their designs in line with T2 of the London Plan. **GET AN EXPERT TO CHECK THIS AND ENFORCE IT**

LO44: To use the planning system to promote permit free and lowcar development.

LO45: To use the planning system to ensure new development meets parking and cycling standards as set out in London Plan. **BETTER TRAIN COUNCIL OFFICERS AND PAC MEMBERS IN CYCLING FIRST PRINCIPLES**

LO46: To use the planning system and developer funding to mitigate potential noise and air quality impacts including during construction. **GET INDEPENDENT INPUT ON THESE ELEMENTS AND ENSURE THEY ARE HONOURED**

LO47: To secure s106 and CIL improvements and/or contributions to mitigate the impact on transport from development. **MAKE SURE LOCAL RESIDENTS HAVE A SEE ON WHAT HAPPENS TO THIS FUNDING AND CAN SEE THE BENEFITS**

TABLE ST03 - Long-term interventions up to 2041: **WHY NOT A SINGLE CYCLE PROG MENTIONED IN THIS TABLE?**

TABLE ST04

"Cycle Routes" : **TOO UNSPECIFIC AND NOT ENOUGH £££**

5.44 Air Quality Initiatives, the council will support the following initiatives through) Schools air quality audits at 3 sites (locations to be determined);) Non Road Mobile Machinery London20 wide project (Construction sites - match-fund £4K per year for three years;) Evaluation of traffic in one air quality focus area in Merton;) Extension of diffusion tube network. **THIS ALL NEEDS TO TAKE PLACE ACROSS BROADER AREA**

5.52 The council will continue to offer to a full range of bikeability training to both adults and children to increase personal confidence and safety, including for those who may wish to return to cycling after a long absence. This will run alongside other road safety education programmes. It would also like to trial pre-bikeability training for children with special educational needs to improve physical activity. **BIKEABILITY IS JUST ONE ELEMENT; SAFE CYCLE ROUTES ARE KEY**