

Sutton 2031: Planning for our future

A response to the April 2016 consultation from Get Sutton Cycling, representing the *London Cycling Campaign* in Sutton

**Local Plan issues and preferred options
Draft Sutton Town Centre Masterplan
Draft London Cancer Hub Development framework**

Consultation reference: https://sutton.citizenspace.com/chief-executives-group/suttons-local-plan-consultation/consult_view (18 February 2016 to 8 April 2016).

Introduction

Due to the extensive nature of the Local Plan documentation, we have focused our response to the consultation on the questions detailed in Section 9 ***Improving Sutton's Sustainable Transport Network***. These questions relate to issues I-35 **Transport Proposals**, I-36 **Transport Impact** and I-37 **Parking**.

It is appreciated that the **Draft Policy on Health and Well-being** features in Section 7 *Serving Sutton's Communities* which links to the promotion of healthy lifestyles. We support the council's intentions to "promote healthy, economic and sustainable alternatives to the car, including cycling and walking". However, people need **to want to cycle** to actually cycle! That inclination will be greater if an active lifestyle is enabled as well as encouraged. This is about making cycling feel safe and inviting for all ages and abilities, so that some short day-to-day journeys can have activity built-in (and be fun too).

The **Draft Policy on Environmental Protection** features in Section 8 *Delivering Sutton's One Planet Targets*. Issue I-34 discusses air quality, and it is noted that in terms of pollution, Wallington and Worcester Park are the worst affected areas in the borough. In 2009, the Sutton Guardian reported: "Pollution levels in Worcester Park, which are already running at alarming rates, would be further increased by the Hamptons development, new figures show"¹. Eight years later, during the first week of 2016, Worcester Park was highlighted as one location of eight across the whole of London likely to exceed nitrogen dioxide (NO₂) in the coming months². With the predicted population growth of 16% in the borough between now and 2031, this dramatically highlights the challenges that are faced. Action is required sooner rather than later. Given that around half of all car journeys in Sutton are less than 5 km, attractive conditions for cycling would have great potential to help to reduce pollution levels and congestion.

¹ *Hampton plans would increase Worcester Park pollution levels, report says (Sutton Guardian), 2 April 2009:* http://www.suttonguardian.co.uk/news/4255388.Hamptons_plans_would_increase_Worcester_Park_pollution_levels/

² *London takes just one week to breach annual air pollution limits (The Guardian) 8 January 2016* <http://www.theguardian.com/environment/2016/jan/08/london-takes-just-one-week-to-breach-annual-air-pollution-limits>.

Before providing some comments on the specific questions in Section 9, we begin with a **summary of our response**. A short section in which we endeavour to provide **some context** follows on from this.

Summary of our response

The role that cycling can play to help meet the challenges in Sutton of delivering new housing, and the infrastructure to support it (including additional schools, employment, improved transport and health facilities) by 2031 **is understated across the Local Plan**, the Sutton Town Centre Masterplan, and the London Cancer Hub Development Framework.

The **Local Plan**, and supporting documentation, **makes little reference** to either the borough's **Sustainable Transport Strategy** (June 2015) or the **Cycling Strategy** (November 2015). **The illustrations** provided in the Sutton Town Centre Masterplan look exciting and spark the imagination, but at the same time **are devoid of any cycling infrastructure**.

All new developments, whether housing, retail, office, industrial, need to be seen as major opportunities for sustainable travel. The **Cancer Hub development** in Belmont, for example, could offer the potential **to develop Brighton Road** into a boulevard **with fully protected cycle tracks**.

Parking has been identified as a **key issue** when it comes to improving Sutton's Sustainable Transport network, and parking is also a key issue directly **linked to cycling** provision. Rethinking parking, in terms of quantity, quality and location will be required if efficient use of contested space is to be achieved. In essence, **people will only want to cycle if there is safe space for cycling**. At the moment, unchallenged use of the **public highway** for **private parking** can be detrimental to the ability of providing that space. There are ways to provide space for parking and space for cycling. It can be done. The degree to which these issues are addressed now, will inevitably determine how we choose to travel in the future.

Unless cycling becomes something that Sutton's residents want to do, then many of the issues outlined in the Local Plan will only become worse over the next fifteen years.

Some context

In March 2013, the Mayor of London, Boris Johnson, unveiled his vision **to make cycling in London safer, more popular, and more normal**³. He declared that "**Cycling will not be treated as niche, marginal, or an after-thought, but as what it is: an integral part of the transport network, with the capital spending, road space and traffic planners' attention benefitting that role**". Now, three years later, and in reference to his achievements in starting to make this vision a reality, he writes: "**My single biggest regret as Mayor is that I did not do it sooner**. Our original painted lanes were revolutionary at the time. But knowing what I do now, we would have blasted ahead with our new segregated cycle lanes from the beginning."⁴. Regret not doing it sooner, is not something that we can afford to say in 2031.

One outcome of this cycling vision, in relation to some **outer London** boroughs, has been the 'mini-Holland' programme. **'Mini-Hollands' are multi-million pound schemes to build high quality cycle tracks, reduce rat-running and make it feel much safer and far more**

³ Mayor's Vision for Cycling in London (March 2013) GLA

⁴ Human Streets: The Mayor's Vision for Cycling in London three years on (March 2016) GLA

enjoyable for people of all ages and abilities to walk or cycle to the shops, school, or just for fun. Our neighbours in the Royal Borough of Kingston-upon-Thames are already benefitting from substantial 'mini-Holland' funding, with cycle track construction starting on Portsmouth Road this year, 2016. So that is **happening right now, in 2016**. Clearly, for such programmes not even to be included in a vision looking ahead fifteen years, especially for a borough that claims it wants to be London's most sustainable suburb, would be a travesty.

It is also worth noting that many more people are choosing to cycle in central London, where a third of all vehicles on the road during the morning rush hour are now bicycles. **Targets** for increasing cycling mode share in our borough were set in the Sustainable Transport Strategy. In the short term (2017) the target is 2.2%, rising to 4% in the longer term (by 2025). All from a baseline of 1% (2009-2012 average). We believe the longer-term target for Sutton is not aspirational enough, as set out in our response to the cycling strategy consultation in 2015⁵.

Section 9: Improving Sutton's Sustainable Transport Network

I-35 Transport Proposals – strategic transport schemes

Before we answer this section, we would just like to suggest that the four projects detailed here (under 'Strategic Schemes') appear to be more specific than strategic. Conversely, the item in regard to cycling detailed under the section that follows ('General Schemes') could be considered more strategic than general.

Q69 (Q35a) Do you support the following strategic transport scheme - A highway scheme to realign and reconstruct Beddington Lane and provide improved pedestrian and cycle facilities (See Proposed Site Allocation S100)

Yes, but needs to go a lot further. For more on our views for Beddington Lane, see our report *A cycle tour of Beddington*⁶. All future highway schemes need to comply with the Cycling Level of Service⁷, at a minimum score of 70%.

Q70 (Q35b) Do you support the following strategic transport scheme - A traffic management scheme in Carshalton to address traffic and safety issues, involving the possible diversion of HGVs in a westbound direction via Ruskin Road to relieve congestion on the A232 at the ponds (See Proposed Site Allocation S101)

This could be beneficial, but the bigger picture needs addressing. All future highway schemes need to comply with the Cycling Level of Service, at a minimum score of 70%. The opportunity needs to be taken to extend this over a wider area.

Q71 (Q35c) Do you support the following strategic transport scheme - A new road between the High Street at Burnell Road to Marshalls Road at Lewis Road, to allow a sustainable transport-only corridor between Crown Road and Marshalls Road (See Proposed Site Allocation S102)

See response to Q70 (Q35b)

⁵ Time to make the case and rise to the challenges (September 2015)

<https://getsuttoncycling.org.uk/2015/09/15/time-to-make-the-case-and-rise-to-the-challenges/>

⁶ A cycle tour of Beddington (February 2016) Get Sutton Cycling <http://getsuttoncycling.org.uk/2016/02/18/a-cycle-tour-of-beddington-village/>

⁷ Cycling Level of Service tools <http://lcc.org.uk/pages/clos>

Q72 (Q35d) Do you support the following strategic transport scheme - A new road linking Brighton Road with Grove Road to enable part pedestrianisation of the High Street between the station and Grove Road (see Proposed Site Allocation S103)

See response to Q70 (Q35b)

I-35 Transport Proposals – general transport schemes

Q76 (Q35h) Do you support the following transport scheme - Improvements to walking and cycling facilities, e.g. new cycle and shared use paths, improved footways and crossings and new cycle “Quietways”

We clearly support improvements to walking and cycling facilities, but our ambition extends beyond simply providing “new cycle and shared use paths” and “improved footways and crossings”. The expectation is for the delivery of cycling infrastructure that will make a difference.

“Quietways” need to be “quiet” (again, CLoS score of at least 70%). This is likely only to be achieved through re-assessing what our residential streets are actually for. ‘Mini-Holland’ schemes offer great potential too.

There is the expectation that the council will meet the objectives set out in both the Sustainable Transport Strategy (June 2015) and the Cycling Strategy (November 2015).

Q77 (Q--) Are there any other schemes or proposals that you consider should be included?

Yes, extensive. See *Space for Cycling: actions points for Sutton*⁸, and *Major schemes for TfL roads to be presented to councillors*⁹ for examples.

I-36 Transport Impact

Q78 (Q36) Do you agree with the draft policy on Managing and Mitigating the Impact of new Development and Promoting Sustainable Transport? If not, please give details

Yes, completely. Promoting means to promote, and promotion needs support. As far as we are aware, neither the borough’s Sustainable Transport Strategy (June 2015) nor the borough’s Cycling Strategy (November 2015) have been actively promoted within the Council or with the residents of Sutton of those who work, study or have businesses in Sutton. The fact that the Sutton Town Centre Masterplan excludes cycling infrastructure (beyond the outdated toucan crossings) would suggest that the hypothesis, that the strategy has not been promoted or discussed with the Council, is supported.

⁸ Space for Cycling: action points for Sutton (June 2014) <http://getsuttoncycling.org.uk/2014/07/03/space-for-cycling-action-points-for-sutton/>

⁹ Major schemes for TfL roads to be presented to councillors (October 2015) <http://getsuttoncycling.org.uk/2015/10/25/major-cycling-schemes-for-tfl-roads-to-be-presented-to-councillors/>

I-37 Parking

Q79 (Q37a) Do you agree that the amount of car parking provided in a new development should be directly related to how accessible it is by public transport?

Statistical analysis has shown that higher levels of public transport accessibility is one factor most closely associated with lower than average car ownership¹⁰. Consequently, relating the amount of car parking provided in a new development with how accessible that development is by public transport would seem an appropriate mechanism.

Car parks can be quite demanding on space, especially when access to them is factored in, so providing this space is often detrimental on the overall public realm. Intensification of development needs to go hand in hand with shops, employment opportunities and recreation facilities.

Q80 (Q37b) Do you agree that in Sutton Town Centre and other accessible locations, the council should consider allowing developments with limited or no off-street parking where certain conditions are met?

Yes. However, non-car owning households require support in other ways beyond convenience of public transport. Initiatives could include, for example, offering free (and easy to arrange) collections of bulky items for disposal that households with a car can more readily take to the reuse and recycling centre.

Developments with no, or limited, car parking, should offer the added benefit of more living space for the same cost. For example, 100m² and no car parking, or 75m² and a car-parking space.

Q81 (Q37c) Do you agree that in areas with poor access to public transport, the council should consider allowing additional on-site car parking provided that it can be justified? Please feel free to provide additional comments.

Even in areas with poor access to public transport, increasing parking spaces should be an action of last resort. These areas are arguably not the best places for further development anyway, unless options for car-clubs, and improved walking and cycling links to transport routes, along with a robust cycle network, are facilitated.

In conclusion

Many transport and health issues can be solved by increasing cycling. Establishing conditions where cycling is safe and appealing is about creating a cleaner, greener, healthier London. If more people were able to cycle it would benefit us all, not just those who currently cycle, or want to cycle.

We would like Sutton to have more inspiring and vibrant public spaces, where communities across the borough can come alive and thrive. A borough where different modes of transport work together to create an environment that is good for us and good for Sutton, free from congestion, as well as air and noise pollution.

¹⁰ Roads Task Force Technical Note 12 "How many cars are there in London and who owns them?" (2013) Transport for London

From Beddington to Worcester Park, and from Belmont to Rosehill, by 2031 Sutton could be a borough where it's normal for everyone to travel more sustainably every day, and the culture of sustainable travel is celebrated.

The journey beyond 2014
Planning
 A less timid approach (1)



London Borough of Sutton Local Development Framework
 Supplementary Planning Document
 North Sutton Sites Draft Planning Brief
 May 2012



Who writes this stuff?

“Crown Road/High Street are part of a network of Borough cycle routes and are seen as an important link to the town centre and any proposals to alter the highway must improve, where possible, cycle connectivity and integrate with existing cycle facilities.”

Paragraph 6.11 North Sutton Sites Draft Planning Brief, May 2012

PS: If you are going to say something like this, it has to be true. Can we honestly say that Crown Road and the High Street are part of a network of cycle routes?

Sutton Cycle Summit 2014
35

The journey beyond 2014
Planning
 A less timid approach (2)



London Borough of Sutton Local Development Framework
 Supplementary Planning Document
 North Sutton Sites Draft Planning Brief
 May 2012



Re-written as shown below could help us get that future “mini-Holland” type funding. It shows commitment, an understanding, and a desire to achieve.

“Crown Road/High Street are part of a network of Borough cycle routes and are seen as an important link to the town centre. This development is an exciting opportunity to improve cycle connectivity and to integrate with existing cycle facilities, and this will be reflected in any proposals to alter the highway.”

This advice is freely given. No consultation fee required!

Sutton Cycle Summit 2014
36

Charles Martin, on behalf of Get Sutton Cycling, 7 April 2016