Sustainable Transport Strategy Consultation Responses

Appendix C

Written Comments received

This list contains substantive comments and those where a change to the strategy is proposed. Q = reference to Questionnaire. Page and paragraph numbers refer to the draft version of the Strategy.

Respondent	Comment	Task and Finish Group endorsed response	Recommended change
D	Supports aims, objectives and proposed actions	n/a	n/a
	Pg. 27, Para. 3.26 – considers evidence on relationship between road transport and climate change to be 'overwhelming' rather than just 'considerable'.	Some people still doubt the evidence, but the consensus seems to be that there is a causal link, so we could change this to 'overwhelming'.	Change 'considerable' to 'overwhelming' in second line of para. 3.26.
	Pg. 35 - would like Crossrail 2 added to the Action Plan under Objective 1.	This can be done.	Add Crossrail 2 to the list in the first action in the Action Plan under Objective 1.
В	Support the vision, aims and objectives.	n/a	n/a
D	Pg. 17, Para. 3.9 – TfL have looked at the feasibility / case for extending London Overground to Sutton and consider that it would be detrimental to overall capacity / service levels on the route between Sutton and Central London via West Croydon. Instead they argue more benefits would accrue from TfL taking over the Southern franchise services in south London.	These comments are helpful in the Council's consideration about the strategic benefits of an extension of the London Overground to Sutton. Some further work on options for rail service improvements for Sutton may be beneficial.	No change
	Pg. 20, Para. 3.12 – S106 contributions should continue to be sought towards site specific transport mitigation such as bus network contributions and highway works.	This is referred to in para. 3.12 which is considered sufficient.	No change
	Pg. 20, Para. 3.13 - TfL welcomes the requirement for developers to provide travel plans and would encourage developers to include measures such as car club membership, cycle schemes and travel vouchers through the plans. TfL suggest that the policy makes reference to the Sustainable	The Council's Transport Assessments and Travel Plans SPD sets out the requirements for travel plans in more detail. Reference could be made to this document.	Add reference to the Transport Assessments and Travel Plans SPD under the text on travel plans.

Travel:Active Responsible Safe (STARS) accreditation programme.		
Pg. 21 - TfL would encourage car clubs to be provided in new developments and free membership to be secured through S106 agreements.	This is done where appropriate. We have a SPD on Car Clubs which sets out the requirements for car clubs through the planning system, but the market has changed and it is more difficult to attract car club operators.	No change
Pg. 21 - Parking provision for developments should be provided in accordance with the London Plan along with electric vehicle charging points and blue badge spaces. Where necessary Car Parking Management Plans should also be secured. Parking levels should be kept to a minimum where developments are accessible by public transport and residents should be excluded from applying for parking permits.	These measures are included in the council's Local Plan policies and applied in planning decisions. However the section on Parking does not mention the use of parking provision in new developments to manage demand. Reference could be made to this.	Make reference in para. 3.16 to parking provision in new developments being restraint-based in line with the standards and policies set out in the council's development plan.
Pg. 22, Para. 3.20 – TfL suggests walking signage improvements are part of the Legible London system and should particularly focus on town centres, high streets and transport connections.	The council will use Legible London sign posts where appropriate and will focus particularly on these areas, but this is considered too detailed for the Strategy.	No change
Pg. 23/24, Para. 3.21 – It is essential that sufficient cycle parking is provided in all new developments and in town centre locations.	Cycle parking is listed as an action in the Action Plan, but reference could also be added in this section. Detailed cycle parking standards are covered in the council's Local Plan cycle parking standards.	Add a new action point on cycle parking at end of para. 3.21.
Pg. 23/24, Para. 3.21 – Further details would be welcomed on electric bikes to share with other boroughs.	There are no further details on this policy at the moment.	No change
Pg. 23/24, Para. 3.21 – the Cycle to School Partnership has been cut back and is not being funded in Sutton, however TfL would support routes delivered with other funding.	Reference to the Cycle to School Partnership will be removed / amended.	Remove reference in brackets to Cycle to School Partnership.
Pg. 3.2, Fig. 3.2 – it is unclear how the LCDS has informed the Quietways routes and further detail should be provided on this in a	This detail will be provided in the forthcoming borough cycling delivery strategy.	No change

supporting document.		
Pg. 33, Para. 3.36 – the planned public realm improvements should also consider the needs of the visually improved.	Reference will be made to the visually impaired.	Add reference to the 'visually impaired' in 2 nd bullet in para. 3.36.
Pg. 37, Action Plan Obj. 2 – TfL suggests LBS also require Delivery and Servicing Plans and Construction Logistics Plans alongside travel plans through the planning process.	These plans are required and mentioned in Para. 3.28. They are also referred to in the council's Local Development Framework.	No change
Pg. 33 - TfL suggests that LBS requests developers to undertake a pedestrian environment review survey and provide the findings as part of the planning application.	This is a detailed matter for the planning process and will be negotiated with developers on a case by case basis through the pre- application process.	No change
Pg. 48, Para. 5.8 – The target on bus reliability incorrectly states that TfL measures performance only for high frequency routes. TfL measures the percentage of journeys departing on time for low frequency routes, as well as the percentage of lost mileage for all routes.	This will be corrected.	Correct reference to TfL monitoring only high frequency routes in para. 5.8.
Pg. 50, T1.1 – the ambitious cycling targets are welcomed but will require a step change in both provision of infrastructure and non- infrastructure to encourage more cycle trips. Given the step change required to meet the targets, TfL suggest LBS consider developing a Cycling Delivery Strategy setting out prioritisation of interventions.	The Strategy sets out the measures and framework to provide a step change in provision for cycling. In addition, the council is commissioning a Cycling Delivery Strategy.	Make reference to the commissioning of a Cycling Delivery Strategy in the Action Plan under Objective 3.
Pg. 51, Appendix A – bus improvement schemes. While the route extension proposals are relatively short they may still have a high cost to TfL due to vehicle requirements, therefore it would need to be demonstrated that there is sufficient demand and that funding is available. Generally TfL does not seek to extend routes that are already long due to the impact on reliability. Similarly the case for Sunday services and improved services to Surrey would need evidence of demand to justify them.	Comments are noted. The council is developing criteria to assess the schemes listed in Appendix A and others that may come forward. This will be developed as part of the implementation of the Strategy for further discussion with TfL.	Appendix A – list of Local Public Transport Schemes – Add note to sub-heading indicating that the scheme list will be regularly reviewed and updated.

	 Pg. 51, Appendix A – request for X26 to stop at Beddington Plough. TfL has previously responded to requests from the council for this and its position has not changed. Pg. 51, Appendix A – reroute the 463 to serve a 'network hole' in Beddington. TfL require clarification on where this is in order to look into it in more detail. 	The council will continue to press for this stop, which will bring considerable benefits to residents and businesses. TfL approached the council about this 'network hole' about two years ago and have looked into it with the council. The council will continue to	No change No change
	Pg. 51, Appendix A – seek the provision of more dedicated TfL school buses. This would be dependent on the level of usage expected from these new services. Generally TfL would look to run additional buses on the existing network and only run special school services where the bus network is limited. In these cases TfL would assess the case and funding would be required.	raise with TfL. The council will continue to work closely with TfL on the need for extra bus capacity to serve new and expanded schools through regular meetings and the local plan process.	No change
	Appendix A – seek improvements to bus-rail and bus-bus interchange. This is not always practical on longer routes which serve multiple stations. However in certain cases it may be worth retiming low frequency routes to achieve better interchange.	n/a	No change
E	(General) Although the objectives are clear and encouraging, the actions to support them are, in general, too weak and many of the proposals are vague and lack robustness. Therefore this is a strategy that lacks confidence. The council needs to show a commitment to deliver the vision and the final strategy should be promoted widely.	Disagree – the actions in the strategy set out the general framework while the action plan contains more specific actions. Once adopted the strategy will be widely promoted.	No change.
	Pg. 1 - The strategy notes that 50% of car journeys in Sutton are less than 5km and therefore there is considerable scope to increase the proportion made by bicycle. This would benefit the local economy. Cycling makes a positive contribution to the economy, as well as public health, reducing congestion,	Noted – these points are largely already referenced in the strategy. We are not aware of any specific evidence on the benefits of cycling to the economy.	No change

improving employee productivity, delivering goods efficiently, and boosting town centres. Enabling cycling is a cost-effective investment which, as well as helping the economy, improves quality of life and gives people a genuine choice of how to travel. Pg. 35, Action Plan - In relation to the proposed major scheme bid for Beddington Lane, it is essential that any scheme results in cycling infrastructure that is fit for purpose. If the council is serious about ensuring the transport network is developed to support the local economy in a sustainable way [Objective 1] cycling infrastructure of the highest quality that transforms the cycling experience and makes it feel safe and stress-free must always be delivered.	The Beddington Lane bid proposal includes new and improved segregated cycle facilities along the length of the road.	No change
(General) Every new development must be seen as an opportunity to shift the emphasis towards sustainable travel. Recent evidence suggests this is not the case, such as the introduction of a one-way street in a new development in Cheam without an exemption for cyclists. Oversights like this diminish the council's credibility for understanding what helps deliver sustainable transport use.	Through the Sustainable Transport Strategy, the council's proposed Cycling Delivery Strategy, and revised Local Plan, policies and procedures will be put in place to ensure that greater consideration and provision is made for sustainable transport users in new developments and these documents will assist in giving greater priority to sustainable transport.	No change
(General) It is good that Sutton was the first borough in London to develop school travel plans for all its schools. However it is important that these plans are implemented e.g. Glenthorne High School travel plan still has a lack of cycle lanes six years after this was first identified in the plan. This was one of the Get Sutton Cycling 'ward asks' for the Stonecot Ward.	School Travel Plans are a high priority for Sutton and will be implemented as resources allow. Provision of high quality cycle facilities around and at schools is an important element of this and will be picked up in the proposed borough Cycling Delivery Strategy.	No change
Pg. 23 - It is good to see the commitment to implement high quality cycle routes and	The council will ensure that appropriate delivery mechanisms are	No change

measures using best practice designs based on the latest London Cycle Network Design Standards, and to see a reference to the LCC's Space for Cycling initiative. Unfortunately the delivery mechanisms to bring this about do not appear adequate.	in place to facilitate good quality cycle routes and designs, and this will be picked up in the proposed borough Cycling Delivery Strategy.	
Pg. 40 & Fig. 3.2 - Reference to the Green Wrythe Lane to Carshalton Village Quietway is misleading, and involves conversion of the footway to shared use.	Reference to this route being a 'Quietway' will be removed as it not one of TfL's proposed Quietways in the borough.	Remove reference to routes being Quietways unless they are part of the TfL Quietway network to avoid confusion, and amend Figure 3.2 accordingly.
Pg. 39, Action Plan - The group cannot support the development of the Sutton gyratory as a shared space, which is not good for blind people, the aged and infirm. It is not clear who will benefit from this, certainly not pedestrians. Instead, a study into the feasibility of providing segregated cycle paths along the gyratory with separate crossing points for pedestrians and cyclists, would be welcomed, and anything that can be done to make it feel less like a motorway and more like part of a thriving, people-friendly town centre needs to be a priority.	One of the aims of such a scheme would be to improve the public realm and remove the barrier to pedestrian movement from surrounding residential areas to the town centre. The Action Plan indicates that a feasibility study will be undertaken where resources allow to examine this proposal and consultation will be undertaken including with groups representing the blind, aged and disabled.	No change
(General) It would be useful if the final version of the strategy could provide examples of the locations, and types, of intervention that reflect both the Space for Cycling ambitions and the London Cycling Design Standards.	This sort of detail will be provided in the proposed borough Cycling Delivery Strategy.	No change
(General) All council staff who are responsible for the delivery of cycling infrastructure should be fully aware of the latest best practice guidelines and have undertaken full training.	Noted – it is intended that the proposed borough Cycling Delivery Strategy will ensure greater awareness by staff of all available guidance.	No change
(General) Provide a clear and robust Cycling Delivery Strategy showing level of support from councillors.	A separate Cycling Delivery Strategy is being commissioned by the council.	No change
(General) Produce a quarterly report outlining current status of transport projects and	This will be considered but would have staff resource implications. A	Make reference to the annual progress review in para. 4.2.

	outwardly promote to the public.	progress review on the STS will be produced annually and this could provide an update on projects.	
	(General) Feature sustainable transport in all correspondence to residents and display the road user hierarchy on the home page of the council website.	Consideration will be given to ways of enhancing the publicity the council gives to sustainable transport.	No change
	(General) Provide clear data relating to targets on a regular basis.	This will be provided in the annual STS progress review. Key indicators are also provided as part of the Councils' monitoring reports to TfL	No change
	(General) Liaise with other London boroughs on projects to share knowledge and experience, and with TfL on their projects.	The council liaises closely with neighbouring boroughs through the South London Partnership (SLP) and TfL through established networks.	Add a new para. after para. 2.3 to refer to working in partnership with local boroughs and SLP.
A	(General) The document needs to point out that it is in line with national, regional and local transport policies.	Reference could be made to this in the Introduction.	Include a new para. after para. 1.2 setting out how the Strategy relates to the wider policy context.
	Pg. 7 - Under 'Walking and Cycling' it needs to mention trips to school.	Reference could be made to this.	Make reference to school trips / modal share under Walking in para. 2.9 and Cycling in para. 2.11.
	Pg. 9 - High car ownership can result from a low PTAL score – would be useful to compare the maps, rather than compare Sutton to London average.	Reference could be made to the effect that there appears to be a relationship between car ownership and PTALs.	Add a sentence to para. 2.15 on the link between car ownership levels and PTALs.
	Pg. 9 - Under para. 2.13 add poor public transport.	This could be added.	Add a new bullet about relatively poor public transport in parts of the borough.
	Pg. 10 & 11, Paras. 2.16 & 2.19 refer to congestion. It would be useful to map and quantify this.	Congestion is difficult to map and quantify as it tends to vary on a daily basis. This could be looked at as part of the Roads Task Force work.	No change
	Pg. 10, Para. 2.17 – where are pedestrian and cycle accidents focussed.	This is too detailed for the Strategy but will be looked at as part of the Action Plan and Cycling Delivery Strategy.	No change
	Pg. 16 - Needs to say something about not penalising local businesses as a preamble to Objective 1.	Para. 3.8 mentions meeting the needs of the local economy and providing for freight and deliveries.	No change

	There is no intention to penalise local businesses.	
Pg. 17, Para. 3.9 – this is the first mention of working collaboratively with another borough – this should be more upfront.	Para. 1.3 mentions that the Strategy provides the basis for partnerships and co-operation. However specific reference could be made to working in partnership with other boroughs.	Add a new para. after para. 2.3 to refer to working in partnership with other boroughs and SLP.
Pg. 17, Para. 3.10 – these roads proposals will have enormous funding implications. There needs to be a section on funding.	This is a strategy document and therefore does not address issues of funding. These are addressed in the LIP.	No change
Pg. 19, Para. 3.12 – most of these actions are being done already – perhaps this needs making clearer.	The introduction does say 'continue to apply'. The Strategy is a way of reinforcing these requirements.	No change
Pg. 20, Para. 3.12 – there is already a Community Infrastructure Plan in place to spend CIL money, and S106 money has almost dried up so this is no longer a realistic major funding source.	Para. 3.12 states that most transport funding will continue to come from TfL. However, transport schemes can be considered for CIL funding and the council can still seek S106 payments for works to mitigate any transport impacts arising from the development	No change
Pg. 20, Paras. 3.13 and 3.14 – There is a group carrying out Travel Plans and Travel Awareness – this section needs to be expanded to include some of the current initiatives.	Consideration will be given to expanding this section.	Expand text in para. 3.13 to say more about travel plans and school travel plans.
Pg. 28, Para. 3.28 seems weak.	Consideration will be given to strengthening this section.	Add a new bullet on the work the council is doing with Industrial Areas and fleet operators, especially in Beddington Industrial Area.
Pg. 29, Paras. 3.29 – 3.31 – sounds as if we are inactive which is not the case. Perhaps the current tasks are why we have such a good accident record.	This section is as much about perceived danger as actual, as perceived danger discourages people from walking and cyclingand it is about ensuring road safety schemes give a higher priority to sustainable modes of transport.	Add 'continue to' before the first bullet action under para. 3.30.
Pg. 30 - The police have concerns over 20mph so this needs care.	The police have said they support 20mph limits. However the council	Add 'self enforcing' before '20mph zones'.

	(General) There should be a section on funding	only supports self-enforcing 20mph zones or limits. Funding is a matter for the LIP and	No change
	as all actions have funding implications which could be exorbitant.	not this strategy.	
С	(General) Suggest a more appropriate title for the document would be Sustainable <i>Travel</i> Strategy as not everyone requires transport.	This was originally considered as a title for the Strategy but it was decided to change it to Transport Strategy as it covers transport as well as travel, including goods transport.	No change
	(Q) Objective 5 – Improving the safety and security of road users is already a statutory requirement and not an optional aspiration.	This Objective is not inconsistent with the statutory requirement and simply reinforces it.	No change
	(Q) Q3 3.1.1 – Disagree with proposed Tramlink extension – would cause congestion and be disruptive. Tram lines are dangerous for cyclists and silent trams a hazard for pedestrians.	Noted. In a consultation held in summer 2014, 84% of respondents supported a Tramlink extension. However, should a Tramlink extension be funded, LB Sutton would work with TfL at the detailed design stage with the aim of ensuring the tram is safely integrated with cyclists and pedestrians.	No change
	(Q) 3.2.1 – If improving the road network means building new roads, it is known that this can result in an increase in traffic.	There are no proposals at present for new roads, apart from residential roads in new developments.	No change
	(Q) 3.2.2 – introduce 20mph areas for the villages sited on the A232 i.e. Carshalton and Cheam, and Sutton gyratory.	This is something that could be promoted to TfL as these centres are on the TLRN.	No change
	 (Q) 3.2.3 – A certain amount of congestion slows traffic until all residential areas are included in 20mph areas. Vehicles travelling at 20mph can drive closer together so reducing congestion. Speeding traffic is already a serious problem in residential streets, leading to poor driving, impatience and collisions. 	Noted. However, congestion is not ideal as it delays buses, and to some extent cyclists, and exacerbates air pollution. The council will continue to introduce 20mph zones / limits where there is resident support and funding allows.	No change
	Pg. 26, Para. 3.24 and 3.25 – the entry and exit of HGVs should be restricted entirely via Coomber Way.	The council is looking at ways to ensure HGVs use Coomber Way rather than Beddington Lane where possible.	No change

P29, Para. 3.30 – it is disappointing that 20mph zones are envisaged whereas 20mph areas are safer as they have no chicanes or humps. On page 30 there is also an out-dated reference to 20mph zones.	The council believes that 20mph zones / limits are only effective with traffic calming measures so they are self-enforcing.	No change
(Q) Q4, 4.1 – travelling by car must be made more inconvenient. New developments must be provided with a shop, community facilities and a petrol station to reduce the need to travel. New developments must allow for pedestrians and cyclists to access and travel through while limiting motor travel. Page 19, Objective 2 – insert 'except for cyclists and pedestrians'.	The council seeks to encourage and facilitate sustainable transport use through the planning system for new developments so as to provide an alternative to car use. Travel plans also assist in this regard. Whilst efforts are made to provide retail and community facilities in new developments this will depend on the scale of the development and the financial viability of such facilities.	Add 'especially by car' after 'reduce the need to travel' in first bullet in para. 3.12.
(Q) Q5, 5.1 – 20mph areas without traffic calming features must be introduced for all residential areas and around schools. Publicity to encourage obedience will make these areas safer for all.	The council believes that 20mph zones / limits are only effective with traffic calming measures. However the council will work with the police to encourage compliance.	No change.
(General) Ensure good surfaces for pavements. It is important that dropped kerbs allow for good pedestrian sight lines in all directions. Reduce waiting times at light controlled pedestrian crossings. Reduce litter and ensure wheelie bins are not left on pavements.	The council seeks to maintain footway surfaces in a good condition but funding for this is limited. Good sight lines are provided as far as possible. TfL control signal timings but the council can request adjustments where necessary. A clean and uncluttered public realm is also a high priority for the council.	No change
(Q) 5.2 – Ensure good road surfaces, drivers trained to respect all road users, more publicity for cycle training for all.	The council seeks to maintain carriageway surfaces in a good condition but funding for this is limited. The council seeks to promote road safety to drivers and will be working with young drivers in particular to ensure good driving standards. The council continues to provide free cycle training for all	No change

	subject to resources, and will	
	promote this as appropriate.	
(General) Reduce the number of no-entry and	The council will review one-way and	No change
one-way streets for all, especially cyclists.	no-entry streets as part of area-wide	
	reviews and introduce 'except	
	cyclists' plates to allow contra-flow	
	cycling where safe to do so. This will	
	be addressed in the proposed	
	borough Cycling Delivery Strategy.	
A number of specific suggestions for cyclists.	These specific suggestions will be	No change
	picked up in the proposed borough	
	Cycling Delivery Strategy.	
Pg. 23, Para. 3.21 – add 'suitable secure cycle	Reference will be made to cycle	Add reference to cycle parking at end
parking facilities close to all destinations' - this	parking.	of second para. in 3.21.
is as important as car parking (Para. 3.16).		
(Q) 5.3 – bus drivers should be trained to	This is the responsibility of TfL and	No change
respect all road users.	the bus operators, but where	
	necessary the council takes up driver	
	training issues with them.	
(General) 20mph areas are needed to help all	The council will continue to introduce	No change
who move slowly.	20mph zones / limits where there is	
	resident support and funding allows.	
(General) Thorough training of young drivers	Subject to continued resources the	No change
before and after test is passed.	council will be working with young	
	drivers in particular to ensure good	
	driving standards.	
(General) More opportunities for 'exchanging	The council will continue to arrange	No change
places' with HGV cabs. Work to provide lower	'exchanging places' events in	
windscreens to improve lorry drivers' visibility.	conjunction with the Police and TfL.	
	TfL has been lobbying the European	
	Union to seek lower cabs for HGVs.	
(General) More cross border bus routes,	The council will continue to make the	No change
especially beyond Epsom.	case for improved cross-border bus	
	routes into Surrey, including to	
	Epsom General Hospital. This is	
	covered in para. 3.9.	
(Q) Q6, 6.5 – remind road users that there are	Noted. This will be done through the	No change
already silent vehicles i.e. pedal cyclists,	council's road safety work.	
therefore electric vehicles should be left to		

travel silently.		
(Q) Q7, 7.2 – Return Sutton's two ring roads to two-way – this will make the town centre more friendly for pedestrians, cyclists and bus passengers – the latter will be able to alight closer to the shops.	The council is not proposing to return the gyratory to two-way but will look at how it can be made more pedestrian and cycle-friendly through the work on the Local Plan.	No change
(Q) Q7, 7.4 – Neighbourhood policing has increased the presence of police on the street to some extent, however more police are required to be seen more frequently for reassurance and to show that they are approachable by all.	Noted. This is a matter for the local police.	No change
(Q) Q8, 8.1 – Wheeling gullies are required for all flights of steps at stations without lifts and on the pedestrian bridge at Angel Hill.	Noted. The council will consider the installation of wheeling gullies where appropriate and feasible. This will be picked up in the proposed borough Cycling Delivery Strategy.	No change
(Q) Q8, 8.4 – dropped and flush kerbs must give good sight lines in all directions for all road users.	Noted	No change
Pg. 8, Para. 2.12 – add a reference to the excessive speeds of some drivers, particularly in residential areas. Also in para. 2.17 and the summary on pg. 12. Inappropriate speed does not appear until pg. 30.	This paragraph is about car ownership but reference will be made to speeding in paragraph 2.17.	Add reference to perceptions of safety and speeding in para. 2.17 (page 10).
Pg. 33 – references to 'the High Street' should be changed to 'shopping centres' as there are only three 'High Streets' in the borough.	Noted – alternative wording could be used here such as 'town and local centres' in the main bullet point.	Change references to 'High Streets' to 'town and local centres' in the main bullet point.
Pg. 33 – to ensure a high quality of cycle stands adopt the TfL design. The type in Sutton High Street is inadequate and causes obstruction.	Noted. Reference to existing design guidance on cycle parking / stands could be included in the proposed borough Cycling Delivery Strategy.	No change
Pg. 41 – disagree with publishing a cycle guide as TfL's maps are sufficient and regularly updated. Add publicity for 'Gear up' which is ideal for timid cyclists and those with disabilities or ailments.	Whilst TfL's cycle maps are good and regularly updated, the council considers that a borough-specific	Make reference to accessible cycling in para. 3.21.

	Pg. 42 – refer to Belmont for Avenue School monitoring station.	Avenue School is one of the 21 additional monitoring locations referred to.	No change
	Pg. 44 – amend 20mph zones to 'areas'.	The recognised terms for 20mph are 'zones' or 'limits'.	No change