

Appendix 2: Full comments on Draft Walking and Cycling Action Plan 2021

1. Walking and Cycling

- 1) The commitment to creating **Low Traffic Neighbourhoods** across the Borough is very welcome and will greatly improve the safety and enjoyment of walking and cycling. However, as above, the document should set out the priorities for delivering LTNs e.g. top, high and medium priority LTNs, beyond those already committed to. Each tranche of LTNs to be delivered should be accompanied by a target year for completion (we request an aim of 75 per cent coverage by 2026) including when complete coverage will be achieved. The map should also make it clearer which roads are boundary roads and which are proposed to be filtered. The phase 'minimise disruption to emergency services vehicles' should be re-written, as it ignores that LTNs often provide additional priority to emergency services via camera filters. The policy should also refer to the needs of disabled people, committing to EQIAs as part of all LTNs, look to co-ordinate with accessible footway improvements and provide residents of LTNs with Blue Badge exemptions as appropriate. The Policy (part A) should also be clearer that safety is a key rationale for LTNs, while 9.13 Part 3 should refer to all casualties, not just serious ones.³
- 2) We strongly welcome the plan to introduce School Streets around every primary school in the borough by 2031 and the coordination of this with LTN implementation. An earlier target date, say 2026, would be desirable and secondary schools should be included in the programme. Delivery of good quality walking and cycling infrastructure will be critical to enabling more people to travel safely by foot or cycle all the way to school.
- 3) We suggest **20mph speed limits** be extended to all roads in the Borough, including roads operated by Transport for London. This is critical to achieving Vision Zero by 2041, which should be an explicit aim referred to in Policy 1 of the WCAP. Where necessary, physical design of roads should be changed to reflect this limit, such as road narrowing. This should be complemented with effective enforcement, as well as measures such as advisory speed cameras and speed displays to help encourage compliance.
- 4) We strongly welcome the intention to **reallocate road space** according to the proposed modal hierarchy under Policy 5. However, **this should explicitly apply to kerbside-space as well as space for movement** (as mentioned in 11.40 but not in the policy). If the WCAP achieves its aims, there will be less need to use a car in Haringey, and, in many cases, to own and park one. This must be reflected in the approach set out. While some parking can be re-provided on side-streets, it will not be possible to maintain the current volumes of parking across the borough and achieve the levels of road space reallocation necessary. Furthermore, the availability of parking encourages people to choose to drive, even for short trips, undermining the investment proposed in active travel. Part D of the policy should be rewritten to clarify that re-providing spaces is an option that the Council will consider to support road space reallocation, but not an aim in itself. **The Council should go further than that and fulfil its promise in its 2018 Transport Strategy to produce a Parking Action Plan that can set out how car use and ownership in the borough will be managed and reduced over time.** Without this, the WCAP is unlikely to succeed. This can also provide an opportunity to review consistency between policies, such as the current situation where it is cheaper to park an electric car on-street than it is to park a bicycle, which provides the wrong incentives.

³ Note that slight injuries are more common on back streets, but still deter people from walking and cycling. Research (Aldred, 2019) has found back streets pose more risk per mile than main roads, and significantly more for slight injuries. LTNs are the only practical solution to addressing these safety problems across a whole neighbourhood.

- 5) Plans for Haringey's streets should focus on the right **integration of infrastructure for people walking and people cycling, as well as those using buses**. At a street level, LTN1/20 has relevant guidance and makes clear "shared use" provision on footways and other busy pedestrian areas is rarely acceptable in an urban context and this should be recognised in the WCAP. Where small areas of shared use have to remain, they must be very clearly marked. At a borough-wide level, planning of the cycle network should be co-ordinated with the planning of the bus network, including bus priority schemes.
- 6) We welcome the recognition of **the role new developments can play in providing infrastructure for walking and cycling**. Haringey's new Local Plan should have an explicit requirement in policy to require S106 contributions from developers to pay for active travel infrastructure where they are near schemes identified in the WCAP. This illustrates why it is critical to identify specific schemes - the Council will find it far harder to ask for funding from developers if it hasn't identified what it will spend it on (see suggested maps 1 and 2 below for an approach that would enable more developer contributions). We also note the draft publication of the [Sustainable Transport, Walking and Cycling London Plan Guidance](#) by the Mayor. The WCAP should be reviewed against sections 2.1 and 3.1 to ensure it meets these requirements. In doing so, the WCAP can demonstrate the Local Plan's conformity to the transport policies of the London Plan, which would be tested at a planning examination. It is important that walking is not forgotten about as part of this approach - an example of unfortunate practice is Lawrence Road, which, despite substantial redevelopment, still suffers from poor-quality pavements that are likely inaccessible to wheelchair users. Haringey's new Local Plan should require accessible pavements for all outside all new developments, including repairs to existing footways.
- 7) We strongly welcome the recognition of the importance of walking and cycling to the vitality of Haringey's High Streets and the commitment to making shopping areas pleasant places to walk and spend time. However we do query whether the level of identified spend in the delivery plan would be sufficient to achieve this.

2. Walking

1. We welcome the recommended **walking clusters and corridors** on page 35 of the document as areas likely to see the heaviest footfall. However, it is not clear how these areas will change, nor what, if any, interventions will be made outside these areas, where improvements are also needed. Low traffic neighbourhoods are suggested as an example of intervention, but while these are a necessary step for a better walking environment, they are not sufficient by themselves, and main roads in particular, which may not be appropriate for filtering, still require walking improvements.
2. The WCAP should list a set of improvements for walking, and, as far as possible, indicate (on a map) broadly where these would be implemented and with some indication of order, priority, and/or target dates for completion. These measures should include:
 - a. **Accessible pavements for all:** the WCAP should establish a general principle that all pavements in the borough should be accessible to all, including wheelchair users, blind people and buggy users. As well as even pavements that are free of clutter, the document should also include tactile paving, dropped kerbs on every crossing and a minimum of 2m width being maintained at all times. While Haringey have an ongoing programme of pavement renewal, it is treated as a matter of highway maintenance, historically led by requests from residents. Instead, it should be treated as a strategic transport issue, with the Council proactively identifying the footways causing the biggest problems to the most people. The implementation of LTNs can be used as a chance to review pavement conditions on a neighbourhood by neighbourhood basis outside the identified clusters.