



9th January 2022

Dear Cllr Hakata,

This letter is a joint response to Haringey's consultation on its draft Walking and Cycling Action Plan from the following organisations:

- Haringey Living Streets
- Haringey Cycling Campaign
- Friends of the Earth Tottenham & Wood Green
- Muswell Hill Sustainability Group
- Haringey Clean Air Group

We welcome the publication of this document and its intent to transform Haringey into 'a borough where walking and cycling will be the default choice of travel'. An ambitious, coherent and implementable plan is critical to urgently tackling the climate emergency, enabling residents to lead healthy, active lives and supporting the sustainable delivery of new homes in the borough. In particular, **we strongly welcome the application of the modal hierarchy proposed, and the overall direction of policies 1-5.**

However, to turn this plan into a reality, **we believe the document needs to be much clearer about what needs to be delivered, where and when.** While the analysis provided is valuable, it should be provided in a supporting evidence document or an appendix, while the action plan should focus more on what action will be taken. In particular, **the document should set out:**

- **The Council's short, medium and longer-term priorities for walking and cycling improvements across the borough:** While the indicated level of ambition is strongly welcome, it is not currently supported by a clear sense of where delivery needs to start. While walking measures can be hyper local, the WCAP should do more to identify specific interventions, both within the identified 'clusters' and outside of them. LTN and cycleways maps should be prioritised e.g. with differentiation between top, high and medium priority schemes. This should make it clear for all on which streets the Council intends to deliver change, based on their high-level feasibility, needs of different modes and conversations with TfL and local stakeholders. Suggested Map 1 below gives an example of how this could be done for a borough-wide cycle network. The WCAP should include a similar map based on the Council's assessments and stakeholder views.
- **Assessment of quality and type of intervention to provide a joined-up network of safe and convenient cycle routes:** the document includes existing 'signed' cycleways and treats them as given, regardless of their quality. In reality, many of these links are nowhere near sufficient quality to enable everyone to cycle safely. Instead, the document should categorise different cycle connections e.g. physical segregation, traffic filtering or junction improvement. Suggested Map 2 below gives an example of how this could be done. The WCAP should include a similar map based on the Council's assessments and stakeholder views.

- **An active and sustainable transport network for 2022-2026:** We know that Haringey's streets cannot be transformed overnight. While the WCAP should set out a complete vision for active travel across the borough, it should also set out aspirations for the first Council term in which it would apply, namely 2022-26. This should include target years for schemes, and a map showing all the changes proposed for these four years, focusing on where there are the greatest opportunities and potential benefits. This would give a concrete basis for councillors to seek a mandate via the 2022 borough elections and give residents a chance to judge how well the Council has delivered by 2026 (at which point the delivery plan can be reviewed and updated). This should set out how the previously agreed £5m budget for walking and cycling should be spent, ideally wholly over the course of 2022-26.

We have summarised the changes to the document we wish to see in Appendix 1 below, and set out our full comments in Appendix 2. We would be happy to discuss further any points raised in this response.

We also would like to comment on the Council's [proposed budget](#) on which it is currently consulting. As the online survey does not allow for organisational submissions, please treat this paragraph as our formal response. **The budget must align with the ambitions of the WCAP if these plans are to be meaningful.** As drafted, we strongly welcome the proposed £8m spend on road casualty reductions but are alarmed by the proposal to spend more than twice this (£20m) on "investment in highway assets." We request a breakdown of how much of this would be for resurfacing road space for cars compared to improving pavements, crossings etc., as well as more detail on the legal requirements¹ and economic benefits² used to justify this decision.

Kind regards,

Haringey Living Streets
Haringey Cycling Campaign
Friends of the Earth Tottenham & Wood Green
Muswell Hill Sustainability Group
Haringey Clean Air Group

¹ If this is based on the Council's network management duty under the Traffic Management Act 2004, it should be noted the Act reads: "*It is the duty of a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives: (a) securing the expeditious movement of traffic on the authority's road network...*" The expeditious movement of traffic (which explicitly includes pedestrians and cyclists in the Act/Guidance respectively) therefore can be balanced against other aims, including those of the WCAP.

² Note that the DfT study quoted will be based on national rather than London-specific data and assumptions. Indeed, one such [study](#) used by [DfT guidance](#) explicitly *excludes London*. They may also assume that faster journey times for drivers generates a social benefit, which is not the case in London if they encourage more people to drive as a result.