

# Harrow Cyclists response to Harrow's Draft Local Implementation Plan 2018

October 2018

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## Q1. Do you recommend any changes to the proposed LIP3 objectives?

We agree with the broad intent of the objectives to improve people's health, increase walking and cycling and reduce car use. We recommend strengthening the objectives as follows:

**Objective 1:** We recommend that 'healthy streets and liveable neighbourhoods' are defined more clearly. The text should specify low levels of traffic on minor roads, segregated cycling facilities on major roads, and safe, convenient pedestrian crossings. Replace the word 'encourage' with 'enable'.

**Objective 2:** Improving cycling safety should also be included in this objective, as Harrow has the second highest rate of cycling casualties in London (see [1]).

**Objective 3:** A target is needed here, e.g. "Increase the number of adults cycling in the borough from x to y, and the number of children cycling in the borough from a to b, in order to improve public health, improve air quality, reduce congestion and reduce the impact of climate change"

**Objective 4:** We suggest rewriting as: "Improve freight servicing and delivery arrangements to reduce congestion and delays on the network, including encouraging consolidation centres and last-mile cargo-cycle or walking delivery of small orders, by limiting motor vehicle access to minor streets and pedestrianised areas."

**Objective 5:** Policies should enable and encourage walking and cycling amongst disabled people, by providing wide, uncluttered footways, places to stop and sit, convenient and safe pedestrian crossings, parking for tricycles and other non-standard bikes, and a good quality cycling network.

**Objective 6:** Encourage the uptake of cargo bikes and electric bikes to replace van journeys.

**Objective 8:** We suggest rewriting as: "Improve transport connectivity by providing bike hubs with secure cycle storage at stations throughout the borough, enabling residents of low PTAL areas to access trains without using a car; provide attractive segregated cycle routes throughout the Harrow and Wealdstone Opportunity Area and particularly between Harrow-on-the-Hill station/Harrow bus station and Harrow & Wealdstone station, which should also receive bike hubs in the first tranche."

**Objective 10.** We suggest adding the aims of improving cycle parking at stations, discouraging car journeys to stations, providing step-free access to tube and rail stations, and prioritising

buses by making some roads bus and cycle only or building new bus lanes (taking space from motor vehicles, and ensuring segregated provision for cycling).

**Objective 11.** We suggest rewriting as: "Prioritise sustainable travel improvements for all new developments to support population growth and housing needs identified in the London Plan and local development framework. Such improvements must include safe cycle routes for residents to transport hubs, healthcare, education and shopping facilities, thereby minimising the use of the private car."

**Objective 13.** We suggest rewriting as: "Keep the transport network in good condition, prioritising the maintenance of routes used by cyclists and pedestrians over those used primarily by the drivers of motor vehicles. Publicise the reporting system for faults in the cycle and pedestrian networks and encourage residents to suggest improvements to them."

We recommend the addition of the following objectives:

**To reduce car ownership**

People who own cars pay the majority of costs (capital outlay, insurance, maintenance) up front, and only a small additional charge for fuel for each journey. This creates an incentive to drive for as many journeys as possible, because the additional cost for each journey is small.

Encouraging residents to hire cars when needed rather than own them outright (by making car clubs available throughout the borough, and making on-street car parking more expensive) will encourage them to use alternative means of transport whenever possible, and will reduce overall costs for most people.

**To remove through motor traffic from minor residential roads**

This can be achieved at low cost (using bollards and one way systems) and is the quickest, most cost-effective way to improve Harrow's streets. It improves air quality, discourages short car journeys and makes the streets safer and more pleasant for walking and cycling.

**To make Harrow one of the best boroughs in London for walking and cycling**

Harrow is known for the wrong reasons - its poor street environments, car dependency and appalling level of diabetes. We would like Harrow to be well known for good reasons instead, to be a leader in urban improvements as Waltham Forest is currently. We want people to enjoy living in Harrow, and for residents to be able to be proud of the borough.

**To ensure long term funding for sustainable investment in walking and cycling**

Progressive improvements to Harrow's streets require much more investment than TfL currently provides - the Netherlands spends at least £20 per person per year on cycling. The LIP should put in place schemes (such as parking charges and road pricing) to generate revenue for ongoing improvements without relying solely on external funding. Such investment will save money in the long term.

## Q2. Do you recommend any changes to the proposed LIP3 policies?

We recommend substantial changes to the policies in the LIP. The existing policies as written are not much different from Harrow's existing policies and will fail to achieve step change improvements in walking and cycling that are essential for the health and wellbeing of people in Harrow.

As documented in the LIP, Harrow has appalling levels of public health and physical inactivity: Over a third of 11-year-olds are overweight and two thirds of adults are overweight, the prevalence of diabetes is second highest in England, Harrow is less active than London and the nation as a whole. Harrow has low levels of cycling, with the lowest rate of cycling to work of any London borough.

The policies are given as a long list, with no hierarchy or prioritisation, making it likely that the most important and transformative policies will be neglected. We recommend the following top priority policies:

1. **Build low traffic neighbourhoods** in areas identified as potential 'permeable neighbourhoods' in TfL's Strategic Cycling Analysis, prioritising higher density areas and those where residents have been particularly affected by rat-running. Motor vehicles should be permitted to enter for access only, with physical measures (e.g. bollards) to stop through traffic. Such schemes in Waltham Forest have reduced motor traffic by 56% within the low-traffic neighbourhood, reduced motor traffic by 14% overall, and increased people's walking by 32 minutes per week and cycling by 9 minutes per week. Increasing everyday physical activity in this way is likely to reduce the incidence of many diseases such as diabetes, heart disease, dementia and cancers.
2. Set the **default speed limit at 20mph**, with higher speeds only on major roads with low pedestrian density and segregated walking and cycling infrastructure. The risk of pedestrian fatality is tenfold higher in a 30mph collision compared to 20mph. The current patchwork arrangement of 20mph zones with speed cushions within an arbitrary distance of a school is inconsistent and confusing, and the reliance on speed cushions as a cheap form of traffic calming is ineffective and dangerous for cyclists. Many outer London boroughs including Waltham Forest and Richmond ([https://www.richmond.gov.uk/consultation\\_on\\_borough\\_wide\\_20mph\\_limit\\_launched](https://www.richmond.gov.uk/consultation_on_borough_wide_20mph_limit_launched)) are implementing a borough-wide 20mph policy, and many inner London boroughs are already 20mph.

3. **Build segregated cycle routes along major roads**, starting with the top priority routes identified in TfL's Strategic Cycling Analysis [2] such as Pinner Road, Station Road, Parkside Way, Headstone Drive, Imperial Drive and Eastcote Lane.

In addition, some policies are badly written, weak or potentially detrimental and need to be changed.

**“PE19 Where alternative options exist, prevent or deter parking on footways and verges”**

This is very poorly written - it implies that Harrow will not take enforcement action against motorists who park on the footway if they cannot find a nearby parking space.

**“RS22 Work with the Metropolitan Police in using their powers of enforcement to deal with illegal cycling on pavements and footpaths”**

Current guidance to police forces is that they should not take action against people cycling considerately on the footway. People do not cycle on footways if the roads are safe to cycle on. The council endorses cycling on the footway in shared use areas, which are allocated in a haphazard manner with no regard to pedestrian volumes or cyclist convenience (including the busy footway outside North Harrow station, where a segregated cycle path has not been provided in order to maintain road space for cars to overtake buses). Dangerous or inconsiderate cycling is already covered by policy RS17 'Support the police in targeting illegal and non-compliant behaviour that places other road users at risk', so there is no need for RS22 to protect pedestrians (who are at much more risk from cars in any case, even on the footway).

What is particularly bad is that there is no policy to enforce safe driving except near schools (RS7, PE8). Strict enforcement against footway is likely to reduce cycling without increasing safety.

We recommend learning from Ealing's Cycle Plan, which is currently out for consultation [3] and the City of London draft transport strategy [4]. Ealing is a comparable borough to Harrow, but the measures to be taken are more ambitious than in Harrow's Draft LIP and are more likely to be successful. The City of London's strategy has a target to reduce motor traffic by 25% by 2025 and includes a map of the proposed road hierarchy (trunk roads, distributor roads and minor access roads) which will ensure that future developments permit only appropriate motor traffic and provide an appropriate street environment. We recommend that Harrow produces a similar map.

Harrow council should work in partnership with concerned bodies such as Harrow Cyclists, pedestrians' groups, residents' and environmental groups. In order for measures to be effective and for money to be spent where it can do most good, local people should be involved and consulted, as they have in Ealing.

## Additional recommended changes to policies

### Walking

Add the following high-priority policies:

#### **Build better pedestrian crossings**

All desire lines across major roads should have formal pedestrian crossings (signalised or zebra), and delays for pedestrians at signalised crossings should be minimised. Single-stage crossings should be used instead of inconvenient two-stage crossings.

#### **Build better footways**

Footways should be free of clutter, level and wide enough to allow people to walk side by side. If there is car parking along the road, there should be no obstructions on the footway - instead cycle parking, trees and other road furniture should be in between parked cars, on build-outs in the road.

### Cycling

C6 should be strengthened. Car parking spaces should be converted to bike parking where there is demand (such as the installation of 'bike hangar' covered parking for residents in multi-occupancy dwellings). Bike parking should include designated areas for dockless hire bikes, and should be accessible to cargo bikes and other non-standard bikes.

C8 should read 'Review cycle parking at all stations across the borough and ensure that provision meets likely demand'

C12 Building a **high quality comprehensive network of segregated cycle lanes along major roads** is a top priority and is the only way to achieve high levels of cycling. It will complement the low traffic neighbourhoods, creating a dense mesh of cycle routes. Research from the Netherlands has shown that cycle routes need to be provided at a mesh density of 400m for people to naturally choose cycling for most journeys. We suggest modifying the wording: after 'provision add 'along desire lines', and remove 'wherever practicable' - it is essential that all cycle routes are accessible to disabled cyclists; not providing accessible facilities is discriminatory and unacceptable.

We suggest adding a policy of ensuring **sustainable long-term funding for cycling infrastructure** at Dutch levels. Harrow should fund street improvements using income from car parking and road use charges, as well as section 106 money and TfL funds, and should not rely solely on intermittent TfL funding. The Mayoral Transport Strategy is aiming for the majority of journeys in London to be undertaken by walking, cycling or public transport, with only 20% of journeys by car, so priorities in road space allocation should reflect this.

Add a policy of **supporting businesses in switching from vans to cargo bikes**. Cargo bikes can have substantial load carrying capacity, and can effectively replace small vans for many tasks. The council should assist businesses in trying, hiring or buying cargo bikes.

## Schools

S1 We suggest rewriting as "Promote sustainable and healthy travel choices and healthy walking routes to school through the use of school travel planning, travel awareness campaigns, cycle training, School Streets where motor vehicles are banned at school run times; and an improved walking and cycling environment"

## Public transport

PT9 Seek to reduce 'kiss and ride' car trips to stations by making them inaccessible within a 50m radius to all cars except Blue Badge holders, and by making cycle parking sufficient, secure and attractive

## Road safety

RS5/6 Make the **default speed limit in Harrow 20mph**; selected trunk roads may have higher speed limits if necessary and safe (if they have segregated infrastructure for walking and cycling).

RS11 Support the police in targeting illegal and non-compliant behaviour that puts cyclists and motorcyclists at risk, using data to focus on the roads with a higher risk of cyclist and motorcyclist collisions. (Harrow has the second highest rate of cycling collisions in London [1]).

RS12 Educate motorised road users on the shared responsibility for safer cycle and motorcycle journeys, through driver and motorcyclist skills training and communications

Ensure that all speed limits are enforced and promote a culture of safe driving within speed limits; protect cycle infrastructure such as cycle lanes and Advanced Stop Lines from illegal waiting, parking and obstruction, by physical means in areas of worst offending

RS22 Remove this policy, as it will deter considerate cycling. Instead, police enforcement activities should be focussed on road users who cause the most harm, i.e. drivers.

## Parking and enforcement

PE19 There should be strict enforcement against parking on footways, on verges or in cycle lanes.

PE20 This policy should be to **regulate all on-street car parking** as a higher priority than motorcycle parking, as motorcycles do not take up as much space. On-street car parking is in

high demand in most parts of Harrow because it is cheap or free, and provision for other modes of transport is poor. Badly parked cars cause danger to cyclists and pedestrians. Harrow needs a borough-wide controlled parking policy, with on street parking charges equivalent to the cost of privately rented parking spaces. This will reduce congestion by improving the availability of car parking spaces (typically 15% of urban traffic consists of motorists looking for a parking space), and reduce the demand for on-street parking. Parking spaces can be converted to environmentally and socially useful functions such as gardens, cycle lanes, bike parking or places to sit and enjoy. Car parking that obstructs cycle lanes must be removed.

An additional policy should be to provide borough-wide **car clubs**, to reduce parking demand by reducing car ownership. This will also reduce motor traffic because people who own cars tend to drive more, as they pay most of the cost up front. Paying per use will encourage people to use modes of transport other than driving, and will save money for most people.

## Social inclusion

Bicycles are a mobility aid and many disabled people find it easier to walk than to cycle. Provision of parking and safe cycling facilities is essential for disabled people.

SI1 We suggest rewriting as "Prioritise in all new schemes the needs of those with mobility difficulties who need to **walk, cycle** or drive to work, shops or other facilities"

SI9 Rewrite as "Ensure convenient car **and cycle** parking for people with disabilities is considered in the development of all parking schemes"

SI11 Rewrite: Ensure adequate provision of blue badge **and adapted cycle parking** is available in all town centres

## Development and regeneration

R15 rewrite as:

In considering planning applications for non-residential development the council will have regard to the specific characteristics of the development including provision made for:

- Operational parking and servicing needs
- Convenient cycle and car-parking for people with disabilities
- Car parking related to shift and unsociable hours working
- Convenient and secure parking for bicycles
- Needs of parking for motorcyclists

## Highway management

An additional policy should be to introduce **road user pricing**, which will discourage car use, reduce congestion and raise revenue for street improvements.

## Changing behaviour

CB2 rewrite as: Promote sustainable and healthy travel choices through the use of school travel planning, travel awareness campaigns, campaigns to educate drivers about safe driving around cyclists, and an improved cycling and walking environment

CB10, CB11 These largely duplicate CB2 and CB9 respectively

CB12 Rewrite as: Review the Harrow Rights of Way Improvement Plan with a view to ensuring that Harrow's parks and open spaces enable people to learn to cycle and use the spaces for safe off-road cycling

CB13 This largely duplicates CB9

Add a policy to **change driver behaviour**: develop a campaign to educate drivers about the importance of safe driving around cyclists and their equal right to road space; reinforce relevant portions of the Highway Code; work with the Metropolitan Police on 'Close-Passing' campaigns and enforcement of Advanced Stop Lines.

Add a policy of organising regular **car-free days**, to provide people with a vision of low-traffic environments and build support for change. Harrow successfully organised a half-marathon which involved closing a number of major roads on a Sunday morning. The principle of car-free streets could be applied much more effectively to free the streets for everyone, not just athletes. Many towns and cities in the UK and abroad are holding regular car-free days (e.g. once a month), encouraging people to enjoy walking and cycling.

## Partnership working

PW9 Rewrite as: Work in partnership with public transport service providers and regulators, seek to ensure that all stations and bus stop locations in the borough are progressively improved to offer a safe, secure and passenger-friendly environment and appropriate 'state-of-the-art' passenger interchanges, including adequate and secure cycle parking

PW10 rewrite as: Work with schools to reduce the number of school trips made by car by introducing School Streets banning motor vehicles at school run times within a 300m radius; liaise with schools regarding suggested highway works required in school locality

PW14 Rewrite as: "Work with the Metropolitan Police to enforce speed limits and take action against footway parking, mobile phone use while driving and unsafe overtaking of cyclists, such as by carrying out 'close pass' initiatives". These have been shown to improve cyclist safety in the West Midlands.

Add a policy of working with **residents and community groups** (such as Harrow Cyclists). Successful street improvement programmes need public involvement, because only they know whether they feel safe or whether routes are convenient. The Manchester Beelines consultations was a set of productive initial planning meetings to ensure that the proposed network meets people's needs. Children and disabled people should also be involved in the design of cycle routes, to ensure that they are suitable for all.

### Q3. Do you recommend any changes to the LIP3 delivery plan?

We recommend that the existing budget is used to prioritise the construction of **low-traffic filtered neighbourhoods** instead of schemes which do not directly reduce motor traffic volumes, such as cycle Quietways or junction remodelling. These could be called 'Healthy Neighbourhoods' to emphasise their benefits for everyone, not just people who cycle. TfL's Strategic Cycling Analysis [2] recommends locations where filtered neighbourhoods should be built, based on propensity to increase walking and cycling (see below). This includes Kenton, Wealdstone, Greenhill, Raynes Lane and South Harrow, which should be prioritised for removal of through motor traffic.



In Waltham Forest, the low traffic neighbourhoods were implemented as the first part of the mini-Holland scheme, and resulted in significant benefits in terms of air quality [5] and increased walking and cycling [6] within the first few years, which is estimated to provide 6 months increase in life expectancy over the lifetime of a resident [7].

There is no evidence that the Quietway approach has been successful; small amounts of funding to signpost cycle routes along roads without segregation or removal of motor traffic do not attract new cyclists. The better quality Quietways in London (e.g. Quietway 2) have built on

existing filtered streets (such as in Hackney) and are along routes where cycle use is already high. Such measures are unlikely to be sufficient in Harrow.

Harrow should join an increasing number of outer London boroughs (such as Richmond and Waltham Forest) in becoming a **20mph** borough - this substantially reduces the risk of death or serious injury to cyclists and pedestrians, and can be done fairly quickly and cheaply using signage, reinforced by subsequent traffic calming measures where necessary.

**High quality, direct segregated cycle routes along main roads** are essential, but will require funding. This can be generated from parking revenue or TfL grants. The chance of being successful in applications to TfL is higher if they can see that Harrow is serious about reducing motor traffic. TfL's Strategic Cycling Analysis shows which routes have the highest cycling potential (see below); these routes should be prioritised.



## Do you have any other comments?

### General comments

The statistics on health and activity, and quotes on cycling show a borough signally failing on cycling and on resident health.

Although the objectives have broadly the right intent, and quote the Mayor's Transport Strategy, the London Plan, Vision Zero and Healthy Streets, the policies and delivery plan will not achieve the stated objectives. The policies show a borough determined to continue doing business as usual. There is a fixation with motorbikes without any clear justification, no commitment to cycle

tracks along main roads, no clarity on the key Strategic Cycling Analysis Routes and no clarity on how Vision Zero will be achieved.

The document does not acknowledge why Harrow's existing policies have failed in the past (i.e. that there has been a reluctance to cause inconvenience to motorists, as well as lack of funding), and does not make any assessment of quality when describing Harrow's cycle network. It thus fails to explain why Harrow has such a low level of cycling despite a 41km cycle network. Most of Harrow's cycle network is unsafe as it consists of narrow intermittent advisory cycle lanes on busy road, and the small sections that are segregated are inconvenient because they give way to minor roads and accesses.

There is a lack of evidence-based, cost-effective, specific concrete policies in the draft LIP. Evidence is available from numerous research studies in the Netherlands [8] and in Waltham Forest [5–7], on how to create an effective walking and cycling network, and its effects on public health.

### Examples of problems and recommended interventions

<b>Problem</b>	<b>Current intervention, as in current LIP</b>	<b>Desired intervention, with evidence of benefit, as seen in the Netherlands and Waltham Forest</b>
Through traffic on minor roads, making them unpleasant for walking and cycling	Traffic calming (does not reduce volume of traffic, so streets remain unpleasant)	Point closures of roads to entirely exclude through motor traffic from a network of minor roads, creating a 1-2km <sup>2</sup> low-traffic neighbourhood
Low levels of physical activity, high levels of car use for short journeys	Encouragement (not effective, as people choose transport based on availability, cost, and comfort)	Low traffic neighbourhoods, with direct routes not available to motor traffic, discouraging car use for short journeys.
Cycle routes are unsafe, unpleasant or indirect	Signposting minor roads as 'Quietways'	Segregated cycle lanes along major roads, to be incorporated in all new road schemes, and funding sought to create a comprehensive network.
High traffic speeds	Expansion of 20mph zones	Borough-wide default 20mph speed limit, except on specific major roads where a higher limit is safe and appropriate.
High car ownership	Car club in Harrow town centre and other new developments	Comprehensive car clubs throughout Harrow. Comprehensive cycle network to make cycling an option for many journeys.

There are also some omissions and inaccuracies in the background information, which affects the interventions that should be proposed. For example, cycling safety statistics based on the number of casualties are misleading, because the level of cycling is so low. This has been quoted falsely as suggesting that Harrow has a good safety record. More detailed analysis by Dr Rachel Aldred of the university of Westminster used TfL's advanced cycle traffic modelling to estimate cycling flows and correlate them collision locations. She found that Harrow has the second highest rate of cycling casualties in London [1] (see below).

R. Aldred et al.

Accident Analysis and Prevention 117 (2018) 75–84



Fig. 2. Over- and under-representation of injury points, by London borough.

Low-traffic neighbourhoods are low-cost, rapid, high-impact interventions that can simultaneously reduce car use, improve air quality, improve quality of life and increase walking and cycling. The creation of low-traffic neighbourhoods by point closures of minor roads, as in Waltham Forest, should be the key policy in the LIP as it will deliver step change improvements quickly and there is good evidence for its effectiveness.

Road reconstruction to incorporate cycle lanes is another key ingredient to increase cycling, but will require more funding, and in Waltham Forest it took up the majority of the budget (although the early benefits are attributable mainly to the low traffic neighbourhoods). The LIP should mention specific routes for which funding will be sought, based on TfL's Strategic Cycling

Analysis and Harrow's own plan (e.g. the Jubilee Route along Honeypot Lane, the Northern Route along Uxbridge Road, the Heart of Harrow route along Station Road, the Metropolitan Routes along Pinner Road, George V Avenue and Lascelles Avenue, and the cross-Harrow route).

Previously Harrow has used modelling to predict the need for motor traffic capacity but ignored walking and cycling, with the result that the redeveloped Goodwill junction near the Kodak development will contain multiple motor vehicle lanes but no space for cycling. Walking and cycling should be included in models and prioritised in new developments, and it would be good to estimate how many car journeys may be replaced by cycling along new segregated cycle routes.

## Specific comments

Executive summary - Page 6

There is not much detail on how the LIP will achieve its objectives, and how it will overcome limitations of Harrow's previous transport policies which have resulted in the current situation. 'Liveable Neighbourhood' is just the name of a funding scheme - we recommend specifying the interventions it would fund in Harrow (e.g. segregated cycle lanes along major roads and redesign of major junctions).

1.3.2 Page 8 - list of consultees

It is disappointing that Harrow Cyclists is not listed as an official consultee, even though cycling should be a key aspect of the policy.

2.2.33

It is disappointing that the description of Harrow's existing cycle network is so cursory. A much more detailed account is needed to explain why the current network does not encourage or enable many people to cycle in Harrow. The total length of 41km makes it seem quite extensive, but the majority is aspirational and does not meet even minimum design standards. The short sections of segregated cycle path do not form a coherent network and are of poor quality, giving way to accesses and minor side roads. The limitations of the existing network must be made clear both in the text and on the map.

It would also be worth including a historical description of the thinking behind the existing cycle network. For example:

"Harrow has a network of old-style signed cycle routes totalling 41km and including most major roads and desire lines. However, none of these lanes conforms to London Cycling Design Standards. Most are on the carriageway with no physical separation, allow parking in the lanes and come to an end before crucial junctions. The off-road Belmont Trail is impassable by cycle for much of its length. These routes have therefore unfortunately not encouraged people to cycle in the borough.

A few sections of route (Rayners Lane, North Harrow and Alexandra Avenue) have segregated two-way cycle paths along the road, built using space from the verge or wide footway as part of LCN+. These are visible, direct and provide protection for cyclists from motor vehicles. However, these routes are fragmented and discontinuous, and give way to minor roads and accesses, so they are inconvenient to use.

The overall poor quality of cycle routes has not encouraged people to cycle in Harrow.

A network of high quality segregated cycle routes along main roads was proposed as part of Harrow's 'mini-Holland' bid in 2013, and TfL carried out initial investigations along some of the routes, but this has not been taken any further. Instead, over the past few years, TfL and Harrow Council have developed designs for cycle 'Quietways' along minor roads, with minor interventions such as new crossings and signage, but no removal of motor traffic.”

Figure 4, page 19

Major roads are marked as 'Overland'

Figure 6, page 21

The blue Piccadilly Line is the same colour as a cycle lane, which is confusing. There are many inaccuracies on the map - the Roxeth Green Avenue cycle track is missing, the Belmont Trail is incomplete and much of it is a muddy track unsuitable for road bikes, the Brookshill section is partly shared footway instead of a cycle lane, and most of the routes marked as 'cycle lanes' do not meet minimum design standards. They typically have intermittent advisory cycle lanes blocked by parked cars, sometimes only on one side of the road. It would be more informative to categorise the routes by Cycling Level of Service, or to mark the cycle lanes as 'signed cycle routes without segregation'. Only the red sections are usable by most people, and even on these segregated routes the design is often poor, with the cycle track giving way to every side road.

2.2.35 Public Transport Accessibility Level (PTAL) - we recommend adding that there is significant scope to increase access to public transport for people living in PTAL areas 0-2 (a high proportion of the borough), by using a bicycle to travel to stations and bus stops.

2.3.1 Why is the cycling rate so low in Harrow? The reason that the 'ongoing efforts to improve cycling provision' have been ineffective is that there has been a reluctance to inconvenience motorists even slightly. There has been no reallocation of road space from driving to segregated cycle lanes, no meaningful cycling provision when roads have been redesigned, and no removal of through traffic from minor roads. It is important to state these reasons for past failures here, in order to be able to address them in this LIP.

We recommend rewriting as: "Harrow is committed to changing the transport mix in the borough and increasing the amount of active travel. The current level of cycling in the borough is low. A

key barrier to cycling, especially for women, older people, people with disabilities and children, is driver behaviour: mobile phone use, aggressive, impatient and abusive behaviour towards people on bicycles, hooting and shouting at people on bicycles in front of their car, close-passing and stopping at traffic lights in Advanced Stop Lanes. Significant changes will be needed to driver behaviour before Harrow residents, especially the most vulnerable, consider that it is safe to cycle on non-segregated roads. Harrow was ranked the lowest of the 33 London boroughs for residents who cycle to work in the 2011 census.”

2.3.3 'Liveable neighbourhoods' and 'Neighbourhoods of the future' are names of funding schemes, and do not define the interventions that will be funded not well defined. This paragraph should state the actual interventions that will be delivered, such as filtered neighbourhoods and segregated cycle tracks along main roads.

Reliance on electric vehicles is misplaced. Although electric vehicles are non-polluting at point of use, fossil fuels are used to generate electricity and energy is used to build these vehicles; even sustainable sources of electricity such as wind power require infrastructure, the production of which uses energy. Therefore, self-generated power ie. Cycling and walking are much more sustainable and should be prioritised over electric vehicles.

2.3.10 Given the budgetary constraints, Harrow should prioritise the most cost-effective intervention, i.e. those that simultaneously improve transport, health and community spirit. An excellent example is to restrict motor traffic in residential areas, which discourages short car journeys, reduces traffic (reducing pollution, noise and danger), and creates pleasant streets that are better for walking, cycling and socialising.

2.3.14 Reducing the rate of cycling casualties (currently second worst in London), increasing walking (as well as cycling), and reducing motor traffic should also be listed as key concerns.

2.4.24 Harrow has very low levels of walking and cycling despite the promotional activities listed in this paragraph. This is because such activities are ineffective without improvements in infrastructure, namely removal of through motor traffic from minor roads (which makes them safe, pleasant and convenient for walking and cycling, and also discourages short car journeys by making them longer) and segregated cycle tracks along major roads and at junctions.

2.4.25 The infrastructure improvements in this paragraph do not go far enough to enable and encourage active travel. Expansion of 20mph zones is insufficient; many towns and London boroughs are now adopting 20mph as the default speed limit across the entire borough. Higher speeds are dangerous for pedestrians and cyclists, and children are unable to judge speeds higher than 20mph. Higher speeds should be the exception rather than the rule, and only applied where safe on major roads with segregated provision for walking and cycling. Harrow should also ensure better enforcement of speed limits and parking regulations. Harrow should encourage conversion of on-street car parking spaces to uses that have greater environmental and community benefit.

2.4.26 It is disappointing that this paragraph prioritises driving and car parking for people with disabilities, with no mention of providing cycling facilities for disabled people. Adapted bikes, wheelchairs and mobility scooters can be essential mobility aids for disabled people. Cycle paths should be smooth, wide and continuous, suitable for mobility scooters and all types of bicycles. Footways should be wide and uncluttered, with trees, bike parking and electric charging points located on buildouts between parked cars where possible. Residential bike parking should accommodate specialist and cargo bikes. Public transport should also be accessible to people with disabilities, with step-free access at all tube and train stations.

2.4.28 The casualty rate in Harrow is not low - the number of casualties are low because walking and cycling levels are low. Analysis by Dr Rachel Aldred of the University of Westminster, accounting for walking and cycling rates, shows that Harrow has the second highest rate of cycling casualties in London [1], and is in the middle ranking among London boroughs for pedestrian casualties [9].

2.4.36 Accident statistics data is likely to be unhelpful, as the most dangerous roads deter people from walking or cycling and may not have high casualty rates. Instead, roads should be consistently designed to safe principles, following the London Cycling Design Standard. Harrow has many dangerous road features such as speed cushions (which encourage cyclists and motorists to swerve, and have no effect on slowing larger cars), narrow cycle lanes (which encourage dangerous overtaking), traffic island pinch points (which cause motorist-cyclist conflict) and lack of cycle track priority over side roads. Some main roads have wide sections that encourage fast driving and overtaking; restricting road space for motorists and narrowing the lanes can create safe space for cycling as well as make the road safer. Harrow should adopt a borough-wide default 20mph speed limit, with traffic calming measures built where necessary, rather than permitting dangerously high speeds because there has not yet been funding to build traffic calming measures. Many outer London boroughs including Waltham Forest and Richmond are taking this approach.

2.4.37 People tend to cycle on the footway if there is too much traffic on the road and safe cycling facilities are not provided, and given that Harrow is one of the most dangerous boroughs for cycling, this is not surprising. Considerate cycling on footways does not pose a danger to pedestrians, and there is no benefit to be gained from rigorous enforcement because it is more likely to discourage people from cycling altogether, and pedestrians are much more at risk from motor vehicles. Guidance to police officers is that discretion should be exercised, and people should not be prosecuted for cycling considerately on footways if the road is unsafe to cycle on. Harrow's own policy on footway cycling is inconsistent - cycling is bizarrely permitted on some very busy footways which have been recently constructed without segregated cycling facilities, such as outside North Harrow Station. There should be much stricter enforcement of motoring offences, with more speed cameras and patrols to deter motorists from parking on footways or overtaking cyclists too closely.

2.4.39 Road use charging and a comprehensive cycle network can reduce congestion. There will be no change in attitude towards modes of transport without a change in infrastructure or cost.

2.4.44 Car clubs should be provided throughout the entire borough, not just in central Harrow.

2.4.55 The most effective measures to reduce congestion are to make other modes of transport more attractive than driving (i.e. building segregated cycle lanes) and increase the cost of driving and parking. Reducing traffic volumes on local roads is important, and has an immediate benefit for air quality, walking and public health, but cycle lanes along major roads are also essential for cycling to be able to realistically replace longer car journeys.

2.4.57 The statements 'Ensure that charges for parking support the economic vitality of all town centres' and 'maintain price competitiveness with comparable privately operated car parks' imply that car parking charges will be kept artificially low in order to encourage people to visit by car. This is the exact opposite of what is required - town centres are unpleasant because of high levels of traffic attracted by cheap parking. Better walking and cycling facilities and public transport will improve accessibility of town centres without increasing motor traffic. Parking charges should reflect demand at a particular location, to ensure that there are always spare spaces available, so that motorists do not have to drive further to look for parking. The most accessible car parking spaces (typically those on the street) should be the most expensive because they will be in highest demand.

Insert first bullet point:

Ensure that accessible parking is available for bicycles, cargo bikes and adapted cycles in convenient places in all shopping centres, encouraging residents to make short shopping journeys by bicycle and helping to revitalise local centres

The statement 'Where alternative options exist, prevent or deter parking on footways and verges' is a very weak policy - parking on footways and verges is illegal, dangerous and damages the footways, and should be rigorously enforced at all times. This statement will be used by motorists to justify parking on the footway if they cannot find a parking space. It contrasts with the heavy-handed approach against 'illegal' footway cycling in 2.4.37, where in most cases safe 'alternative options' (i.e. cycle paths) do not exist.

2.4.64 See earlier comments under 2.3.3 on the 'greenness of electric vehicles – they are only pollution-free at the point of use, not in electricity generation or manufacture and their use does nothing to ease congestion or make it safer to cycle and walk.

2.4.86 second bullet point rewrite as:

In the development of parking schemes, the council will ensure convenient car and cycle parking for people with disabilities is provided

2.4.103 Ensuring cycle design standards - it is not acceptable for provision for tricycles and trailers to be included only 'wherever practicable'. Such policy is discriminatory; people of all abilities have the right to be able to use cycling infrastructure.

3.5.3 Liveable Neighbourhoods Table 7: There is no plan to include Pinner in the list of Liveable Neighbourhoods. As this is one of the most cohesive communities in the borough, but is beset by school run traffic, and rat-running on routes such as Paines Lane and Albury/Evelyn Drive, action should be taken to provide filtered permeability and remove through traffic.

3.7.3 Reference to the northern route Uxbridge Road area should include a commitment to segregated cycle routes compliant with LCDS. The current reference gives no indication of the type of measures proposed.

3.12.1 Table 11: Overarching mode share aim – changing the transport mix

Londoners' trips to be on foot, by cycle or by public transport

The target of 50% from a base of 48% is very unambitious. The mode shares should be broken up by walk, cycle and public transport to be meaningful and allow measurement of success. If around 31% of Harrow's residents work within the borough, a target should be that at least half of those who currently drive to work within Harrow (a maximum half-hour cycle to any part of the borough) will use cycling, walking or public transport by 2025.

Outcome 1 - Londoners to do at least the 20 minutes of active travel they need to stay healthy each day.

Commentary: This will not be achieved by cycle training, which has been available to date in Harrow and has not achieved change. It will be achieved by the borough's campaigning to drivers about correct driving around cyclists, so that people feel safe to cycle; and by providing segregated infrastructure to LCDS on main roads.

Londoners have access to a safe and pleasant cycle network: commentary suggests that the Quietway schemes will achieve this. Harrow Cyclists has consistently advised that the Quietways are substandard and will only encourage a small number of people to cycle more. They do not lead to useful destinations, and some streets such as Vaughan Road are far from quiet.

Outcome 2 - Deaths and serious injuries from all road collisions to be eliminated from our streets

There is no mention of driver training, only cycle training. Driver behaviour is the single most important cause of accidents to cyclists, and people's fear of cycling. The plan must address driver behaviour in order to be successful.

Outcome 3 - Reduce the volume of traffic in London.

The target given is a 0% increase by 2021, when the metric requires a 10-15% reduction. This is unacceptable. Increased walking, cycling and bus priority initiatives must bring about a reduction, which should have a measurable target.

Reduce car ownership in London – a measurable target should be used.

## Comments on Strategic Environmental Assessment and objectives

2.b. Rewrite as:

Making the borough a default 20mph zone, with defined exceptions for routes where a higher limit will not discourage walking or cycling; provided that segregated cycling routes are installed on such routes.

c. Rewrite 'encouraging' as 'enabling'

d. rewrite as:

Promoting health walks and permitting considerate cycling through Harrow's green spaces, especially on paved/asphalted paths through parks, enabling children and adults to learn how to cycle in safety.

f. Rewrite as:

Introducing driver education campaigns to promote safe driving around cyclists and reinforce the Highway Code.

4. Rewrite as:

Reduce inequality and social exclusion by

[a and b stet]

c. Providing safe cycle routes along all major desire lines and a borough-wide 20mph default speed limit, giving flexibility to the 20% of Harrow residents on low pay, and the 24% of Harrow residents without access to a car, to reach better employment opportunities at low cost by cycle, including taking on shift work when public transport is unavailable.

d. Providing cycle hangars in areas of multiple-occupancy housing such as Greenhill and Wealdstone wards, which also have high levels of deprivation and unemployment, enabling residents to store their cycle safely and get to work reliably.

e. Banning the use of 'Cycles Dismount' signs, which discriminate against cyclists with disabilities; ensuring that where road works are necessary, access to the cycle and pavement network is prioritised over convenience for drivers of motor vehicles.

5. Reduce air pollution and reduce traffic emissions by:

Ensuring that it is more attractive to cycle or walk for journeys of less than 1 mile than to drive a car, using both 'carrots' and sticks'.

h. rewrite as:

Reducing the need to travel by motor vehicle by requiring property developers to include cycle storage in, and fund cycle routes from, developments to reach transport, healthcare, education and shopping facilities and to limit the use of land for car parking.

i. Rewrite as:

Creating School Streets where motor vehicles are banned within a 300m radius of a school for one hour around school run times, thus enabling teachers, parents and children to walk, scoot or cycle to school.

6. Mitigate...

c. rewrite as:

Reducing travel by motor vehicle by x % - [there is a need to set a measurable target based on current figures]

8. Promote recycling by...

c. Supporting the development of a non-profit bicycle refurbishment/recycling scheme which will enable Harrow residents to buy bicycles at low cost.

10. c rewrite as :

promoting appropriate streetscape improvements, including reducing unnecessary street clutter and ensuring that charging points are sited on the public highway rather than in pedestrian and cycling space.

## Comments on Equality Impact Assessment

### **Summarise the impact of your proposal on groups with protected characteristics**

We suggest rewriting as follows: "There are wider benefits to all members of the public, but creating Healthy Streets will especially benefit people with protected characteristics.

Danger from, and fear of, traffic are particular problems for women, people with mobility issues, learning difficulties or more vulnerable road users such as the elderly and children. Removing through traffic from residential streets will allow them more freedom to get out, whether this is on foot, by mobility scooter or cycle. Providing better cycle parking at stations will allow them to access public transport more easily. Creating 'school streets' where motor vehicles are banned at school run time will allow children to walk, scoot or cycle to school more easily. Improving the cycle infrastructure through providing accessible segregated cycle lanes and accessible filtering

into safe neighbourhoods will particularly benefit people with disabilities who use non-standard cycles, such as tricycles and handcycles.

Reduction in motor traffic will benefit people with protected characteristics through disincentives to use private cars and increased cycling and walking, which will achieve improved air quality. Benefits will also come from more dropped kerbs; better parking for people with disabilities whether using scooters, cycles or cars; easier road crossing facilities, increased provision of seating, Shopmobility, travel training and travel planning support.”

### **Assessing Impact**

The link to Borough Profile data does not work. A working link should be used.

### **Age**

Rewrite as follows: “14.9% of Harrow’s residents are 65 or older.. As with most areas in the country, the borough has an aging population. It is expected that the number of residents aged 65 plus will increase by nearly 42% and those aged 85 plus could increase by over 62% by 2029. In order to support Harrow’s residents into a healthy old age, it is essential that the transport plan encourage active travel for elderly people. In the Netherlands the over-60s account for about half of the growth in bicycle use for recreational purposes, on the one hand because the overall health situation of this age group has improved, and on the other, because the introduction of electric bicycles has fostered the use of bicycles among seniors [10].

Providing safer neighbourhoods by banning through traffic, and cycling infrastructure on main roads to London Cycle Design Standards, will benefit elderly people by allowing them to access shops, activities, healthcare and transport, and use e-bikes where necessary.

Increased provision of healthy streets suitable for improved access for all; including improved road safety, additional seating, an improved environment for walking and cycling and general environmental improvements.

Health Walks will continue. All new initiatives and facilities will be publicised through to road users aged 60+ by targeting community groups, day centres and social clubs, facilitating bespoke workshops and presentations and providing road safety literature.”

### **Disability**

Healthy streets will benefit people with impaired mobility and learning difficulties.

Disabled cyclists will no longer have to fear the use of ‘Cycles Dismount’ signs. Many disabled people cannot dismount. Current cycling facilities will be reviewed, and new facilities created, which allow people with non-standard cycles such as tricycles and handcycles to use them. Advice will be taken from Wheels for Wellbeing <https://wheelsforwellbeing.org.uk>

For people with disabilities using public transport, we will work with TfL and other landowners to ensure that they can park non-standard cycles at all Harrow stations by

For those people with disabilities using cars, we will provide appropriately located Blue Badge parking spaces.

Healthy streets reviews to include appropriate dropped kerbs and improved road crossings suitable for those with visual or auditory impairments.

Reducing motor vehicle use will improve air quality, benefitting people with respiratory disorders including asthma, COPD, emphysema and bronchitis.

Increased provision of healthy streets suitable for improved access for all; including improved road safety, additional seating, an improved environment for walking and cycling and general environmental improvements.

Independent travel and cycle training will be supported for people with learning difficulties.

### **Pregnancy/Maternity**

Rewrite as follows: "Exercise in pregnancy is important for the health of mother and baby. Obesity in pregnancy is increasing, and potentially harmful. The effect of motor traffic is the same for pregnant women and mothers as recorded below under 'gender.' – women disproportionately fear motor traffic. Therefore, dangerous traffic conditions have a particular impact on pregnant women and mothers wishing to cycle with their children. Enabling pregnant women and mothers to access healthcare by cycle through the provision of safe convenient cycling facilities will benefit both mothers and children."

### **Race/Ethnicity**

Rewrite as follows: "Walking and cycling have wide benefits for all members of the public. However, 37.7% of Harrow's population are Asian/Asian British or 'Other Asian'. People of South Asian descent suffer disproportionately from diabetes [11]. Harrow has the second highest diabetes rate in the country at around 10% of the population. This has a huge impact on Harrow residents' health and wellbeing, as well as local costs for health and social care. Exercise is a key component of controlling diabetes [12]."

Enabling people of South Asian descent, and all other diabetes sufferers, to cycle in their daily life instead of driving a car will have a disproportionate impact on public health for this group. All the targeted interventions which increase cycling and walking numbers will benefit this group."

### **Gender**

The experience of British Cycling's Breeze network, which enables women to access cycling, shows that women are less willing to engage with traffic than men, and their freedom to cycle is therefore especially restricted by current road and traffic conditions in Harrow. This also means

that they are unlikely to encourage their children to cycle. Poor quality unsegregated painted lanes for cycling, which allow parking in the lanes, are not effective in engaging this group. A joined-up network of protected space for cycling and a 20mph speed limit across the borough are needed. This is a significant Equality Impact. Providing cycle infrastructure to London Cycle Design Standards will particularly benefit women, who comprise more than 50% of the Harrow population.

### **Cumulative Impact**

Rewrite as follows: "The cumulative impact of this policy and other major policies combine to have a significant beneficial impact on people in the Age, Disability, Pregnancy/Maternity, Race/Ethnicity and Gender protected characteristic groupings."

### **Any other impact**

Rewrite as follows: "The policy has the potential for significant wider benefits to the health agenda and enabling people to take up active travel."

### **Public Sector Equality Duty**

Rewrite second para of response to the question as follows: "The proposed LIP3 will advance the equality of opportunity for people in the Age, Disability, Pregnancy/Maternity, Race/Ethnicity and Gender groups by improving their health and freedom of action, enabling easier access to the transport network and access to all employment, entertainment and services thereby improving quality of life. The policy will support vulnerable road users such as women, children, the elderly and those with mobility and learning disabilities."

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