

# What are Sutton's key borough traffic reduction objectives?

## 1 Overview

Each London borough is required to develop a Local Implementation Plan (LIP) to set out how the borough will deliver, or implement, the Mayor's Transport Strategy (MTS) at local level. Transport for London (TfL) manages the LIP process on behalf of the Mayor, and allocates money to the London boroughs to spend on projects that support the MTS.

The latest round of LIPs (the 'third round', effective from April 2019) need to reflect the vision and priorities of the new Mayor's Transport Strategy, published in March 2018.

The Mayor's Transport Strategy (GLA, March 2018) sets out three priority areas for action by Transport for London, the London boroughs and other delivery partners. These priorities are:

- Healthy Streets and healthy people, including traffic reduction strategies
- A good public transport experience
- New homes and jobs

In terms of traffic reduction strategies, the Mayor's Transport Strategy is clear in noting that these strategies need to be developed at a borough level and as part of Local Implementation Plans. Despite this requirement, Sutton's draft Third Local Implementation Plan for Consultation (LB of Sutton, November 2018), and the post-consultation, updated, version for Mayoral Approval (February 2019), both report that **"Sutton does not have a separate traffic reduction strategy, but the key borough traffic reduction objectives are set out in the Sustainable Transport Strategy, the Local Plan and the Cycling Strategy"**.

In an attempt to determine what Sutton's traffic reduction objectives are, we have reviewed Sutton's Sustainable Transport Strategy (LB of Sutton, June 2015), Cycling Strategy (LB of Sutton, November 2015), and Sutton Local Plan (LB of Sutton, February 2018). The findings from this review can be summarised as follows:

- **The council's transport vision, as set out in the Sustainable Transport Strategy, includes support for a 'modal hierarchy'. This support could be considered as reflecting a desire to see traffic reduction. However, despite the vision, there is little evidence to suggest that the 'modal hierarchy' has been at the forefront of recent borough transport schemes.**
- **The Cycling Strategy includes a commitment to identify locations where it is appropriate to create reduced or traffic free environments in residential areas. This commitment could be considered as a traffic reduction objective. Nonetheless, despite this pledge, no residential areas within the borough have yet benefited from the creation of a reduced traffic, or traffic free, environment.**

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- **The Local Plan essentially states that development schemes should pay particular regard to assessing the impact of possible increased traffic movements, and that traffic improvement measures should be implemented where necessary to ensure that traffic flow is not unduly affected. This stance would suggest that traffic reduction objectives are not a priority locally. Furthermore, there is little evidence to suggest that active travel is being facilitated, and car use reduced, as a result of recent and current major developments in the borough.**

A conclusion of this review is that Sutton's third Draft Local Implementation Plan does not fully fulfil its remit in terms of introducing a traffic reduction strategy. Consequentially, it is **anticipated that this draft document, in its current format, will not meet with mayoral approval.**

Figure 1 shows an extract from 'Guidance for Borough Officers on Developing the Third Local Implementation Plan' (GLA, March 2018), which has been marked-up to place emphasise on the requirement for boroughs to introduce traffic reduction strategies.

Figure 1: Detail from 'Guidance for Borough Officers on Developing the Third Local Implementation Plan' (March 2018)

### POLICY 25

The boroughs shall prepare and implement Local Implementation Plans (LIPs) containing proposals for the implementation of the Mayor's Transport Strategy in their area. Each LIP should also contain a delivery plan and a monitoring plan.

The priorities that are required to be addressed by the boroughs in their LIPs are:

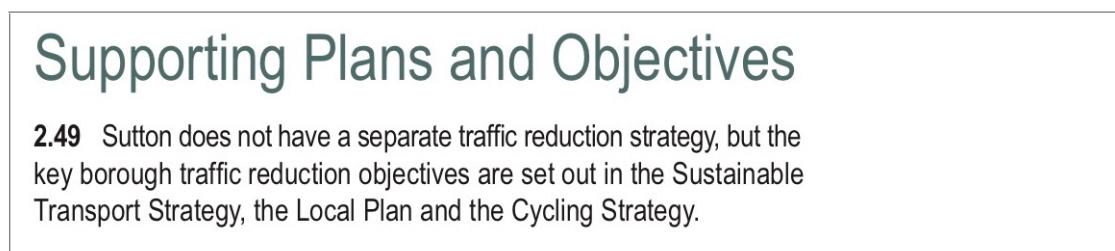
- A contribution to reducing Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041
- The application of the Healthy Streets Approach across all areas of local transport and public realm policy
- The improvement of street environments for people who are walking, cycling and spending time, **including the introduction of traffic reduction strategies**
- The provision of a good public transport experience for those who live in, work in, or visit the borough
- The use of the transport principles of Good Growth to guide the development of new homes and jobs'

## 2 Introduction

Sutton's Draft Third Local Implementation Plan (LIP) for Consultation was published in November 2018 (having been approved by members of the Environment and Neighbourhood Committee at their meeting on 20 September 2018)<sup>1</sup>. The document set out how the borough intends to implement the Mayor's Transport Strategy (GLA, March 2018), covering the period to 2041, at local level<sup>2</sup>.

A requirement of the MTS is for boroughs to prioritise the introduction of traffic reduction strategies, and for these traffic reduction strategies to be developed at a borough level as part of Local Implementation Plans. However, reference to this particular requirement in Sutton's draft Third Local Implementation Plan was rather muted. The document simply made the statement "Sutton does not have a separate traffic reduction strategy, but the key borough traffic reduction objectives are set out in the Sustainable Transport Strategy, the Local Plan and the Cycling Strategy" (Figure 2).

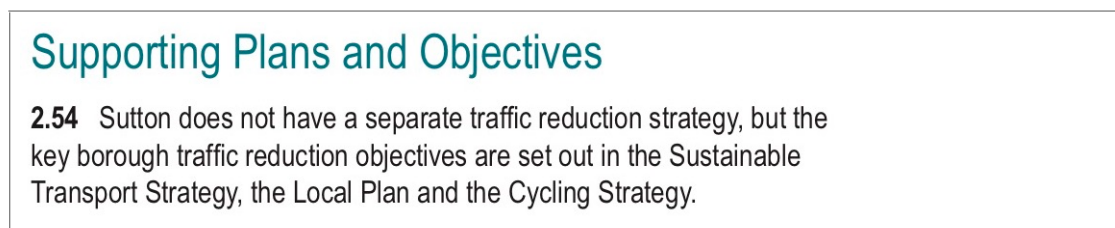
Figure 2: Extract from Sutton's Draft Third LIP for Consultation: November 2018 (page 28)



Get Sutton Cycling responded to the draft Third LIP consultation in December 2018<sup>3</sup>, noting that it would be useful for the borough traffic reduction objectives to be explicitly stated within the final version of Third LIP rather than simply referring to other policy documents. Especially so, given that it was not clear from the referenced policy documents what these key traffic reduction objectives were.

Disappointingly, the subsequently published draft Third Local Implementation Plan for Mayoral Approval (February 2019), released ahead of the Environment and Neighbourhood Committee meeting on 7 March 2019<sup>4</sup>, did not expand on the key traffic reduction objectives. The original sentence remained: "Sutton does not have a separate traffic reduction strategy, but the key borough traffic reduction objectives are set out in the Sustainable Transport Strategy, the Local Plan and the Cycling Strategy" (Figure 3). No other references to the term 'traffic reduction' were included.

Figure 3: Extract from Sutton's Draft Third LIP for Mayoral Approval: February 2019 (page 29)



In an attempt to flesh-out the stated key borough traffic reduction objectives, this report details the findings of a review of the Sustainable Transport Strategy (LB of Sutton, June

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2015)<sup>5</sup>, the Cycling Strategy (LB of Sutton, November 2015)<sup>6</sup> and the Local Plan (LB of Sutton, February 2018)<sup>7</sup>.

## 3 Some rationale and background on the MTS and the third LIP

### 3.1 Projected population growth

London's population is expected to rise from 8.7 million in 2015 to 10.8 million by 2041. The corresponding number of trips made by Londoners is projected to rise from 26.7 million to 33 million. An aim of the Mayor's Transport Strategy (GLA, March 2018) is to change the way people choose to travel so that, by 2041, 80 per cent of all Londoners' trips will be made on foot, by cycle or by public transport (compared to 63 per cent in 2015)<sup>8</sup>. In order to achieve this aim, and so begin to resolve problems in London relating to car dependency (which include poor public health, congestion, and parking stress), one of the priorities to be addressed by the boroughs in their Local Implementation Plans is for the improvement of street environments for people who are walking, cycling and spending time, **including the introduction of traffic reduction strategies. A traffic reduction strategy** is defined as a "borough-led strategy to reduce car and freight traffic at a local level, developed as part of LIPs".

A good overall summary of Sutton's Third LIP, including borough transport objectives, targets, indicators, long-term transport interventions, and population projections, is provided in chapter 3 of the 'Equalities Impact Assessment (EqIA) of Third Local Implementation Plan' (LB of Sutton, November 2018)<sup>9</sup>, a companion document to the LIP.

The EqIA notes that the total resident population of the London Borough of Sutton was estimated at 202,200 in June 2016. The 2011 census gave a resident population of 190,146, an increase of around 10,000 from the 2001 census figure of 179,768. Data produced by the Greater London Authority gives a projected population of 207,378 in 2018, rising to 222,186 in 2031<sup>10</sup>. The borough's Sustainable Transport Strategy had noted in 2015 that "Over the period from 2011 to 2026 Sutton's population is projected to rise by around 27,000 (13.5%), from 199,000 to 226,000. This population increase is already being experienced in Sutton with an increase in the birth rate of 34% since 2001". So, there is some variation in the figures given in the STS (2015) and the EqIA (2018), with the forecast in the latter suggesting a lower rate of population growth than stated in 2015. Nevertheless, all of this indicates that the resident population of Sutton is increasing.

### 3.2 Traffic reduction

The 'Guidance for Borough Officers on Developing the Third Local Implementation Plan' (March 2018)<sup>11</sup>, published to accompany the MTS and assist local authorities with their subsequent LIP submission, notes that "borough policies, plans and programmes, play a key role in achieving the outcomes of the Mayor's Transport Strategy, and that **traffic reduction is essential for the health, sustainability, attractiveness and efficient functioning of the city**. Every London local authority will need to contribute towards it.

Figure 4 and Figure 5 provide some extracts in relation to the phrase 'traffic reduction' in the Mayor's Transport Strategy and the associated document 'Guidance for Borough Officers on Developing the Third Local Implementation Plan' respectively.

Figure 4: Some extracts relating to 'traffic reduction' in the *Mayor's Transport Strategy, Greater London Authority, March 2018*

(Page 20): MTS Policy 1: **"The Mayor, through TfL and the boroughs, and working with stakeholders, will reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel**, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041".

(Page 98): **"Traffic reduction strategies** should be developed at a borough level as part of Local Implementation Plans, with the aim of reducing car and freight traffic levels across London".

(Page 294: Implementation Plan – Outer London) "Borough LIPs' **traffic reduction strategies** will seek to actively reduce traffic levels in town centres, on high streets and other places where people want to be, including by reducing the space allocated to moving and parked cars, to create welcoming environments for people to walk, cycle and spend time in".

(Page 96: Borough traffic reduction strategies – Proposal 23) "The Mayor, through TfL, will work with those boroughs who wish to develop and implement appropriate **traffic demand management** measures, for example local (TfL or borough) road user charging or workplace parking levy schemes, as part of **traffic reduction strategies** where they are consistent with the policies and proposals set out in this strategy".

(Page 96: Borough traffic reduction strategies) "London boroughs will need to think radically about the role of **demand management measures** so as to tackle local traffic and transport challenges and improve local places".

(Pages 33/34) "Outer London high streets, town centres and communities are often traffic dominated, noisy and polluted, which impacts the local economy and residents' quality of life. Approximately one third of CO2 emissions from London's transport is generated by cars in the area, and for the good of current and future residents of this part of the city, **the dominance of motorised transport must be addressed**. Improvements to walking and cycling environments will enable many of the trips currently made by car to be made on foot or by cycle. Measures that reduce car dependency will free up space for essential freight and business trips".

(Page 33): In Outer London "Walking is the first choice for short trips, and buses are important in providing access to town centres, but the car is used for most other travel. **Cycling, however, has huge untapped potential to replace many of the shorter car trips made in outer London**".

(Page 307) "[By 2041] **There will be at least 3 million fewer daily car trips and one quarter of a million fewer cars owned in London**".

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Figure 5: Some extracts relating to 'traffic reduction' in the *Guidance on Developing the Third Local Implementation Plan, Greater London Authority, March 2018*

(Page 28) Chapter Two: Borough transport objectives – Overview. The Mayor's Transport Strategy sets out three priority areas for action by TfL, the London boroughs and other delivery partners. These priorities are:

- Healthy Streets and healthy people, including **traffic reduction strategies**
- A good public transport experience
- New homes and jobs

(Pages 1 and 2) In the Foreword, the guidance notes that borough **traffic reduction strategies** will be a key step towards achieving the aims of the MTS, and the ambition of Vision Zero (where ultimately no one is killed or seriously injured on London's roads), adding that it is hoped "local leadership will see the transformative effect that the Healthy Streets Approach can have on your area".

(Page 37) "**Boroughs will have a major role to play in making London a city where people choose to walk and cycle more often** by improving street environments, including by tackling air pollution. LIPs will need to demonstrate an ambitious approach to increase the proportion of the borough's population who walk or cycle for at least 20 minutes a day to contribute to the aim for all Londoners to achieve this minimum daily active travel level by 2041".

(Page 41; Outcome 3: London's streets will be used more efficiently and have less traffic on them – policy 5) "Boroughs should set out their local strategy and plan for **reducing car traffic and managing freight and servicing traffic** so that it uses the road network efficiently, using their Delivery Plan, and other borough-related policies such as land use policies, development control and parking policies".

### 3.3 Targets for traffic reduction in Sutton

Sutton's third LIP provides a trajectory to 2041 for the expected **reduction** in 'annual vehicle kilometres', and a target **to reduce** the 'number of licensed vehicles owned'<sup>12</sup>. These metrics essentially reflect a specific outcome of the MTS, '**Outcome 3: London's streets will be used more efficiently and have less traffic on them**' (a 10% to 15% reduction in vehicle kilometres, along with 250,000 fewer vehicles owned London-wide). Sutton's specific targets relating to this outcome are reproduced in Table 1a and Table 1b below.



Table 1a: Sutton-specific targets for annual vehicle kilometres

<b>Outcome 3: London's streets will be used more efficiently and have less traffic on them</b>						
Including the following Sutton-specific targets:						
<b>3a: A 10% to 15% reduction in vehicle kilometres by 2041</b>						
Annual vehicle kilometres (millions)						
Observed			Trajectory			
2014	2015	2016	Percentage change by 2021	Percentage change by 2041	2021	2041
615	614	635	0 %	-5 %	614	583
				-10 %	614	553

Table 1b: Sutton-specific targets for the number of licensed vehicles owned

<b>Outcome 3: London's streets will be used more efficiently and have less traffic on them</b>				
Including the following Sutton-specific targets:				
<b>3c: Traffic will fall and congestion kept in check, allowing more efficient operations</b>				
Metric: Number of licensed vehicles owned, by borough				
Observed			Sutton target / trajectory	
2014	2015	2016	2021	2041
91,176	92,461	93,540	90,400	86,900

Sutton's 'borough vision' for 'Outcome 3', as stated in Sutton's draft third LIP, is "to work with TfL, the Mayor and government to improve the public transport offer in the borough and provide a realistic alternative to car travel for short and medium length journeys, in particular commuting and travel to school".

The 'opportunities and actions' associated with 'Outcome 3' include:

- Seeking to reduce the overall need for vehicle ownership, and at the same time mitigate population growth, through planned public realm improvements in Sutton town centre, the delivery of new Quietways and cycle routes, adoption of Healthy Streets principles for local schemes, and car club spaces for new developments.
- The expectation that car usage will be reduced along one of the borough's key employment and commuting corridors through implementation of the Sutton Link tram scheme.
- The potential to improve bus capacity in the borough through a proposed TfL bus reorganisation, to counter the poor public transport accessibility levels currently faced by many residents and businesses, as well as children travelling to and from school.
- The concentration of significant housing growth in areas where there is high public transport accessibility in order to maximise opportunity for low car/no car developments.

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- To maintain and monitor the council's approach to the provision and charging of car parking across the borough in order to ensure this is aligned with the LIP objective to reduce traffic where possible, and support a shift towards lower emission vehicles.

Most significantly perhaps, in terms of enabling active travel in the here and now, is the inclusion of the following opportunity and action:

- To support residents in investigating and implementing measures to reduce through traffic on local roads (e.g. lorries in Beddington)

However, this particular opportunity would be more compelling, and promising, without the addition of the phrase 'e.g. lorries in Beddington'. This reference to lorries in Beddington almost certainly refers to Beddington Lane, and the Beddington North TfL Major Scheme<sup>13</sup>. Beddington Lane is classified as a B-road, and can carry 1,400 vehicles an hour at peak times<sup>14</sup>, so is not 'local' in the same sense as a residential road (which may carry an inappropriate level of traffic) is local. Although the current, ongoing, Beddington North TfL Major Scheme is to include "improved management of heavy goods vehicles (HGVs) going through the village", a restriction on the largest weight lorries in Beddington Village will not result in a reduction in traffic volume that will make cycling on the carriageway through the village any more attractive than it currently is.

In terms of supporting residents in investigating and implementing measures to reduce through traffic on local roads, it is hoped that the council will make the case for, and bring forward, low-traffic neighbourhoods<sup>15</sup>. In doing so, the borough will increase the likelihood of successfully delivering on 'Outcome 3: London's streets will be used more efficiently and have less traffic on them'. This is about being proactive, rather than simply reactive.

A chapter within the third LIP relates to the Delivery Plan. Two projects, out of a total of twenty-three listed schemes included in the Delivery Plan for 2019-2020, refer to residents' concerns about the speed and volume of traffic<sup>16</sup>. The residential roads concerned, Kingsmead Avenue, Worcester Park and Woodstock Avenue, Stonecot Hill, have a total combined length of about 1.3 km. The borough's road network includes 358.7 km of residential (local access) roads<sup>17</sup>. If just a small percentage of these residential roads are used by cut-through traffic, then clearly the current schemes are really only a very small part of a big issue. So why wait for residents to highlight an issue, before doing something about it? **There has never been a better time for local authorities to be proactive**, and use emerging evidence to make the case. Ultimately, of course, how quickly these issues are resolved comes down to political will.

### 3.4 The LIP as a statement of intent

At Sutton Council's Environment and Neighbourhood Committee meeting held on 7 March 2019, which lasted for around two hours and a half hours, only three minutes was given to the agenda item 'Local Implementation Plan Funding Settlement 2019-20'<sup>18</sup>. Considerably more time, possibly not surprisingly, was given to discussing issues around the borough's Parking Strategy. This was unfortunate really, given that parking is linked to the borough transport objectives within the LIP. The disappointingly short amount of time given to discuss the LIP would suggest that committee members were focused more on the LIP as purely an annual spending submission (and seeing this year as no different to any other), and rather less on the third LIP as a statement of intent, an insight into the level of commitment and ambition in helping to deliver towards the new MTS.



Having set the scene, now let's get on with searching for those key borough traffic reduction objectives.

## 4 In search of Sutton's key borough traffic reduction objectives

According to the authors of Sutton's draft Third LIP, **"Sutton does not have a separate traffic reduction strategy, but the key borough traffic reduction objectives are set out in the Sustainable Transport Strategy, the Local Plan and the Cycling Strategy"**.

Surprisingly, perhaps, the phrase 'traffic reduction' is absent from all three documents. However, the word 'traffic' does appear no less than forty-one times in the Sustainable Transport Strategy (June 2015), around twenty-two times in the Cycling Strategy (November 2015), and has eighty appearances in the Local Plan (February 2018).

Do these references to 'traffic' tell us anything about the borough's traffic reduction objectives? Is there anything else within the Sustainable Transport Strategy, the Cycling Strategy and the Local Plan that could be interpreted as a key traffic reduction objective? Essentially, by simply referring to these policy documents in its draft third LIP, documents that predate the MTS, is the council providing recognition that traffic reduction is essential for the health, sustainability, attractiveness and efficient functioning of London as a whole?

The conclusion drawn, as will be seen, is that the key policy documents to which the Draft Third LIP refers are not particularly forthcoming in terms of traffic reduction objectives. Consequently, we would like to see borough traffic reduction objectives, as part of a traffic reduction strategy, clearly stated in Sutton's next Sustainable Transport Strategy (expected in 2020).

### 4.1 Traffic reduction and the Sustainable Transport Strategy

The Sustainable Transport Strategy (June 2015) provides the council's transport vision:

"Transport policy and provision within the borough should contribute to a more sustainable future, a better and safer environment, economic prosperity, improved quality of life and greater equality".

The Strategy notes that the council's commitment to sustainability will result in the creation of safer and more 'liveable' streets that provide for both movement (particularly by sustainable modes of transport) and an enhanced 'place' function. In order to realise this vision, the Strategy will seek to 're-balance' streets to **reduce the dominance of motor vehicles and to give greater priority to pedestrians, cyclists, public transport users and local residents over through traffic**, while maintaining an appropriate level of movement on main roads and taking account of the needs of all road users. Furthermore, in support of the vision, the council declares **support for a 'modal hierarchy'** (Road User Hierarchy), which puts sustainable modes of transport above less sustainable modes and prioritises roads users accordingly. **The inclusion of the 'modal hierarchy' could suggest a desire for traffic reduction.**

In order to measure the success of the Strategy in achieving its objectives, seven indicators are provided for monitoring purposes. These indicators are 'Mode Share'; 'Road Traffic Casualties'; 'Bus Service Reliability'; 'CO<sub>2</sub> emissions'; 'Air Quality'; 'Travel to School by Sustainable Transport' and 'Staff Travel'. Targets for each indicator had been adopted

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through the Sutton Transport Plan 2010 (LIP) and One Planet Sutton Strategy. Consequently, for the 2018 LIP to refer to the Sustainable Transport Strategy as the way forward is not particularly aspirational.

### 4.1.1 Using planning policy to reduce car use

The strategy details six main objectives. All six of these objectives broadly look to encourage and facilitate more journeys by public transport, walking and cycling, by various means. One of these objectives, objective 2, relates to reducing car use, with the title “**Reducing car use** and the need to travel through the appropriate location of new development, travel planning and travel awareness campaigns”.

One stated outcome of objective 2 is “to discourage car use and encourage greater use of sustainable transport”, and that this will be achieved through use of the planning system. The Strategy notes that existing **planning policies will be applied to ensure** all major trip-generating developments are located in areas of higher public transport accessibility. Furthermore, these planning policies will ensure **all major new developments are accessible by, and make provision for, sustainable forms of transport, particularly walking and cycling**. In addition, restraint-based parking standards will be used to ensure an appropriate level of parking is provided in new developments. Importantly, the council will use the **Community Infrastructure Levy (CIL)**, collected from new developments, for transport infrastructure. More immediately, the council will promote travel plans; support schools in developing and implementing school travel plans; implement travel awareness and smarter travel campaigns; continue to support car clubs; use its Parking Policy to further its aims to improve road safety, and facilities for disabled people, pedestrians and cyclists.

When it comes to planning policies, the Sutton Local Plan is the place to look. As will be seen later in this review, the latest Local Plan (February 2018) has very little to say about borough traffic reduction objectives. A main focus of the Local Plan appears to be to ensure that development schemes pay particular regard to assessing the impact of **possible increased traffic movements** and that traffic improvement measures are implemented where necessary.

As for the council collecting CIL from new developments for transport infrastructure, it is not known how much funding, if any, had been raised in this way since 2015. What is known, is that in 2015 almost £400 million was being pumped into Sutton town centre to deliver a series of key projects to create thousands of new homes and jobs as well as deliver major transport improvements over the next five years<sup>19</sup>.

Recent key projects in Sutton town centre have included a new Sainsbury's superstore (as part of a mixed-use development) situated close to the town centre, and the Sutton Point tower development (comprising residential, retail, office and hotel space) close to Sutton station. The superstore, completed in December 2016, includes a car park offering free parking for up to two hours, along with additional carriageway space provided on the High Street to access the car park through a signalised controlled junction. Public realm improvements have been made, although the opportunity was not taken to remodel and upgrade a path along the western side of the site to facilitate improved access by cycle. Some cycle parking has been provided, but most of this is only accessible through the car park. Meanwhile, at the Sutton Point development, situated on the one-way, three-lane, gyratory, some uncovered cycle parking stands have also been installed in the grounds.

However, it looks as though, on completion of the work in early 2019, cycling in the vicinity of the development is set to remain as unpleasant and challenging as it has been at any period in the last forty years.

By failing to provide improved accessibility to either of these major developments by sustainable modes “particularly walking and cycling”, both the superstore and the tower developments have essentially failed the full remit of the borough’s Sustainable Transport Strategy. Opportunities have been lost.

#### 4.1.2 Improving air quality by reducing traffic levels

‘Traffic’ is mentioned throughout the STS. The top reference appears in the phrase **‘traffic levels’** (no fewer than seven times). Promisingly, one of these references to ‘traffic levels’ expands to **‘reducing traffic levels’**. This phrase appears within a stated commitment by the council in support of an objective to reduce the harmful effects of transport on health and the environment and its contribution to climate change (Objective 4). The commitment reads “The council will implement measures to improve air quality in the borough through **reducing traffic levels**, encouraging more fuel efficient driving techniques and greater use of zero and low emission vehicles”.

Again, all very promising. However, no explanation is provided as to how traffic levels are to be reduced. Reference is made to the Air Quality Action Plan (AQAP) from 2013, which “includes a number of measures aimed at tackling air pollution”<sup>20</sup>, and that “the council intends to work closely with employers and developers through the travel planning process to encourage them to provide electric charging points at existing and new developments, in order to encourage the take up of electric vehicles”. But moving from petrol and diesel vehicles to electric-powered vehicles, whilst improving air quality locally, can hardly be described as an aspiration that will deliver on traffic reduction. The outlined actions to deliver on improved air quality include a continuing commitment to monitor the air quality (obviously), and the implementation of measures to reduce the environmental impact of freight deliveries and air quality (through reducing traffic speeds and congestion to smooth driving, and introducing cleaner vehicles). The health benefits of walking and cycling are to be promoted through smarter travel and public health travel awareness campaigns, and one organised, themed, cycle tour of the borough is to be undertaken each year during the summer months. These actions can hardly be described as particularly ambitious traffic reduction objectives.

#### 4.1.3 An awful lot of traffic

The second highest reference to ‘traffic’ in the STS, appearing a total of five times, is **‘traffic congestion’**, with **‘traffic casualties’** appearing three times. Then **‘traffic management’**, **‘traffic dominance’**, **‘traffic noise’**, **‘traffic casualty rates’**, **‘traffic calming’** and **‘traffic collisions’** each appear twice. There is individual reference to a **‘traffic survey’**, **‘traffic growth’**, and then **‘reduction in traffic’**. This mention of reduction in traffic is in reference to a Department for Transport National Road Traffic Survey that reports a reduction in overall traffic levels within the borough of 15.4 per cent between 2003 and 2013 (from 715 million vehicle-km to 605 million vehicle-km), noting this is likely as a result of the economic downturn in 2007-2008. Other one-off mentions of ‘traffic’ appear as **‘traffic bottlenecks’**, **‘school traffic’**, **‘population growth and traffic’**, **‘traffic and congestion growth’**, **‘local motor traffic’**, **‘non-local motor traffic’**, **‘traffic movement’**, **‘industrial traffic’**, **‘traffic flow’**, **‘traffic signals’**, **‘traffic and public realm schemes’**, **‘motor traffic’**, **‘traffic scheme’**, **‘less trafficked local roads’**, **‘traffic pollution’**, **‘growth in the volume of traffic’**, and **‘speeding traffic’** and the phrase discussed previously **through motor traffic’**.

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All that 'traffic' in the Sustainable Transport Strategy, but no specific mention of 'traffic reduction'.

### 4.1.4 Less trafficked local roads

The phrase '**less trafficked local roads**' sounds promising, but actually it is just a reference to roads that carry less traffic than some other roads. The sentence in question reads: "The Mayor of London's focus is now on developing more commuter cycle routes such as cycle superhighways and other similar routes supported by Quietways which are **less trafficked local roads** available 24 hours a day", and invites the reader to view the 'Proposed Cycle Route Network' map for Sutton. Although the indicated "cycle route network" includes roads that carry less traffic than A-roads, many of the highlighted local roads that form part of the so-called cycle network carry in excess of 500 vehicles an hour during peak times. With this volume of traffic, these 'less trafficked local roads' will never be appealing places for most people to feel safe and comfortable for cycling.

### 4.1.5 Summarising the STS and traffic reduction

**The council's transport vision, as set out in the Sustainable Transport Strategy, which includes support for a 'modal hierarchy', could be considered as reflecting a desire to see traffic reduction.** However, nearly four years after the adoption by the council of the STS, it is difficult to see any evidence that the council's support for the 'modal hierarchy', or the council's stated desire to reduce the dominance of motor vehicles, has actually made any real differences to the transport schemes that have subsequently been developed in the borough.

Specific borough traffic reduction objectives are not easily identifiable in the Strategy. Emphasis is placed on the appropriate location of new major developments, travel planning and travel awareness campaigns. Nevertheless, the completion of recent major developments close to Sutton town centre would suggest that **opportunities to make provision for active travel, as the first and obvious choice at these locations, are still not being fully taken.**

Finally, it is noted that at Sutton Council's Environment and Neighbourhood Committee meeting, held on 28 June 2018, there was a recommendation to members to instruct officers to start work on a replacement Sustainable Transport Strategy to take effect from 2020. It is good to know that this updated Strategy is to be given the status of a Supplementary Planning Document. It is hoped that the Strategy will clearly define a traffic reduction strategy for the borough, outline how traffic reduction objectives are going to be met, and provide evidence that the borough is capable of delivery.

## 4.2 Traffic reduction and the Cycling Strategy

Moving on to the borough's Cycling Strategy (November 2015). What does the Cycling Strategy have to say about traffic reduction objectives?

The word 'traffic' or 'trafficked' appears twenty-two times in the document. The first occurrence appears in the 'Foreword', where Cllr. Jill Whitehead, Chair of the Environment and Neighbourhood Committee at the time, writes: "The benefits of cycling are well documented, including the benefits to air quality, climate change, public health and well-being, productivity, travel cost savings, congestion and **traffic noise** and the local economy".

Then in Section 1: 'Introduction', Cllr. Ruth Dombey, Council Leader, says: "With more and more cars on our roads, **traffic** and parking **problems** are increasing and the quality of the air we breathe is deteriorating. We can't carry on like this".

#### 4.2.1 Policy and guidance

The next six mentions of 'traffic' in the Cycling Strategy appear in Section 2, 'Context', sub-section 'Policy'. Firstly, there is reference to the Mayor of London's 'Vision for Cycling' (published by the GLA in 2013 during the administration of Boris Johnson)<sup>21</sup>, with "Better places for everyone: moving towards a 'village in a city' with more trees, better pedestrian environment and **less traffic**". Then reference is made to eight of the twenty guiding principles detailed in the London Cycling Design Standards (TfL, 2014)<sup>22</sup>. These include "Cycling is now mass transport and must be treated as such"; "Facilities must be designed to accommodate a large number of cyclists"; "Bicycles should be treated as vehicles, not pedestrians". Two of the other guiding principles referred to in the Cycling Strategy mention traffic: "Cyclists need separate space from volume **motor traffic**", and "Separation can be achieved using **low-traffic streets**".

Finally, in the context and policy section of the Cycling Strategy, reference is made to the Transport Vision set out for the borough in the Sustainable Transport Strategy. Here **traffic congestion** and **traffic dominance** in town centres are highlighted as key transport challenges relevant to cycling. Reference is also made to the **road user hierarchy**, and how the hierarchy prioritises consideration of pedestrians and cyclists above local and non-local motorised **traffic**.

So, the context section of the Cycling Strategy sets the scene in terms of less traffic, low-traffic streets, and the prioritisation of vulnerable road users over motorised traffic. All good. The question is, though, to what degree does this context get carried forward into the core of the strategy?

#### 4.2.2 Traffic and the Plan for Cycling

Section 3 of the Cycling Strategy, 'Our plan for cycling', is structured according to six objectives, with an associated 'Action Plan' in Section 4. The word 'traffic' or 'trafficked' appears twelve times across three of the six stated objectives.

In Objective 1 '**Make Sutton a more attractive borough for cycling and create a high quality cycle route network**', the word appears once when 'Quietways' are detailed as short to medium term opportunities, and are defined as "a cross-London network of high-quality guided routes on **low-traffic** back streets". (But, as already mentioned when discussing the Sustainable Transport Strategy, the proposed 'Quietways' are destined for streets that carry over 500 vehicles an hour at peak times, streets that can hardly be described as 'low-traffic' back streets).

Then in Objective 2 '**Make Sutton a safer borough for cycling**', the word 'traffic' appears seven times in various phrases. **Traffic calming** is mentioned three times and **traffic speed(s)** is mentioned twice. Traffic volume is also mentioned, and with it a reference to reducing traffic volume: "These interventions [area-based interventions within neighbourhoods], such as traffic calming and 20mph zones, deliver packages of measures to **reduce traffic volumes** and speeds through residential areas to create environments suitable for cycling".



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This is the closest so far to traffic reduction, and sounds slightly more promising when further backed up with “We will also work with local stakeholders to identify opportunities for further **'low-traffic zones'** where through-access by car is restricted and **low-traffic neighbourhoods** are created, which maintain cycle and pedestrian access”. This commitment transfers to an action, within the strategy's Action Plan, which is specified as the item **'Filtered permeability'** with a description to “**identify locations where it is appropriate to create reduced or traffic free environments in residential areas, which favour cycling**”. This is much more like it. Although, as far as we are aware, in the three years since the publication of the Cycling Strategy in November 2015, there have been no specific discussions or proposals around 'low-traffic zones' (with the exception of one informal residential survey carried out during the summer of 2017 in the Benhill Wood Road and Grennell Road area to the north of Sutton town centre in relation to a proposed 'Quietway') and none have been delivered or introduced<sup>23</sup>.

**Nevertheless, a commitment to identify locations where it is appropriate to create reduced or traffic free environments in residential areas, or create 'low-traffic' zones with filtered permeability, can definitely be considered a traffic reduction objective.**

This just leaves one further mention of traffic in 'Our plan for cycling', and this is in Objective 4 **'Encourage safe and considerate behaviour by all road users'**. “We will... identify any locations, particularly junctions, on **heavily trafficked arterial routes** within the borough at which segregation is the most viable option for ensuring safe interactions between cyclists and traffic, and identify what kind of segregation is required”. This appears as the action 'Segregated routes' in the action plan. The only known progress on this, in the three intervening years, is the development of the Beddington North TfL Major Scheme. This is set to deliver an enhanced cycle path, separate from vehicular traffic, adjacent to an extended section of Beddington Lane in the east of the borough close to the boundary with Croydon. However, in our response to a consultation on this scheme in July 2017, when we asked for the improvements to the proposals at the Marlowe Way ('Asda') junction so as to avoid cyclists having to navigate tight ninety-degree turns and manoeuvres, our suggestions were not incorporated in to the final proposals<sup>24</sup>. So, yes, very good that infrastructure for cycling, separate from vehicular traffic, is being provided as part of the Beddington North TfL Major Scheme. Disappointing, though, that this is not being facilitated to the highest standards.

Whilst on the subject of infrastructure for cycling, separate from vehicular traffic (but not shared with those on foot), it is good to note that the updated Draft Third LIP for Mayoral Approval (February 2019) does not rule out the provision of protected space for cyclists in the borough, the opposite of which was hinted at in the draft consultation document<sup>25</sup>.

Beyond explicitly mentioning the word traffic, is there anything in the Cycling Strategy that suggests there are objectives around traffic reduction? **Objective 3 'Encourage a shift from the car to cycling for shorter journeys'** notes: “New major developments within the borough present an opportunity to secure funding for improvements to the local transport infrastructure, including improved provision for cyclists”. To further deliver on objective 3, the council notes: “The schools expansion project presents a further opportunity to secure funding to encourage cycling to school, making sure that good quality facilities for cycling are there from the outset. We will work with new schools and schools undergoing major expansions to ensure that safe cycling routes to schools are identified, as well as secure, well-sited and covered cycle parking”.



### 4.2.3 Are opportunities being taken?

Given the recognition that major developments within the borough present opportunities to secure funding to encourage a shift from the car to cycling for shorter journeys (and so deliver on traffic reduction), are these opportunities actually being taken?

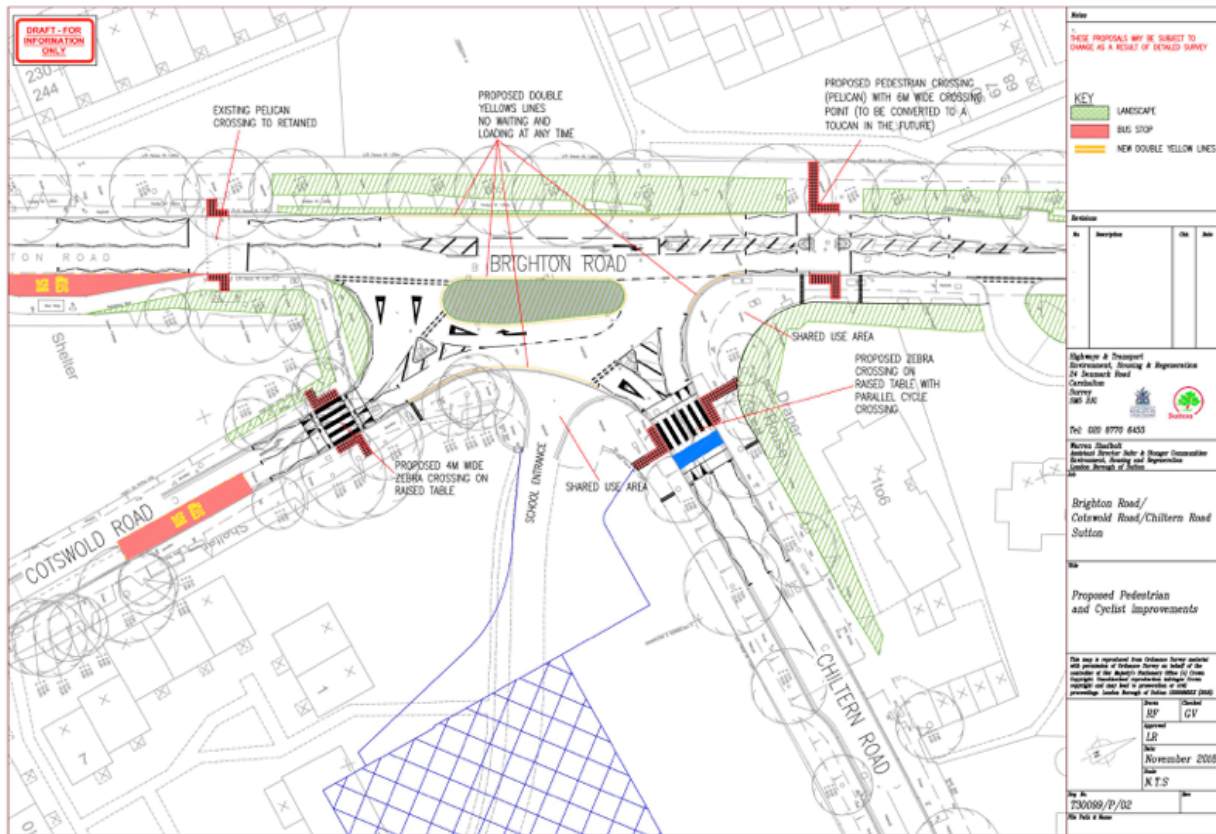
In the review of the Sustainable Transport Strategy, two key projects within Sutton town centre were cited as examples where the opportunity to improve accessibility by cycle had not been provided. But it is not just in Sutton town centre where opportunities are being lost. A major new development currently under construction in Hackbridge is also set to deliver next to nothing for cycling<sup>26</sup>.

As for the schools' expansion project presenting a further opportunity to secure funding and ensure that safe cycling routes to schools are identified from the outset, as put forward in the Cycling Strategy, where is the evidence that this is actually happening?

In Belmont, to the south of the borough, a new secondary school is under construction adjacent to the proposed London Cancer Hub. The Harris Academy Sutton will, no doubt, include cycle parking provision when it moves to its new permanent site later in 2019 (similar to Stanley Park High School, which relocated to its present site in 2012, but which since September 2018 has required students who cycle to school to display a cycle number plate<sup>27</sup>). However, beyond the immediate school gates of the Harris Academy Sutton, around the busy Brighton Road, Chiltern Road, Cotswold Road intersection<sup>28</sup>, the only physical plans proposed out on the street are sections of shared footways linked by parallel crossings (Figure 6). An improvement, yes, but arguably no more of an improvement than would have been delivered without a Cycling Strategy, or a Sustainable Transport Strategy, in place.

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Figure 6: Consultation plan for Brighton Road, Cotswold Road and Chiltern Road in Belmont.  
Statement of reasons: "To progress to statutory consultation and notices and installation of the improved crossing points for the new school in Belmont".  
*LB of Sutton, January 2019*



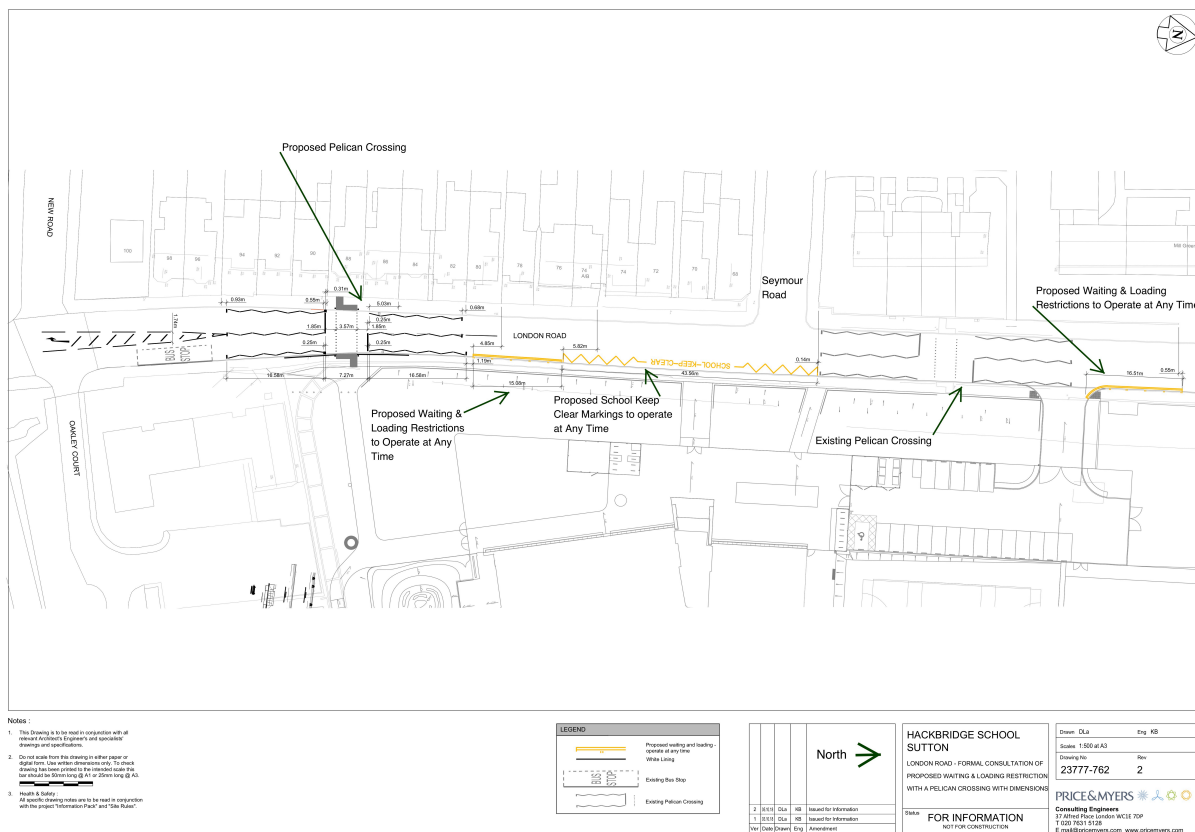
Meanwhile, on the other side of the borough, Hackbridge Primary School is expanding to a new site on the busy London Road (A237)<sup>29</sup>. Staff and children can look forward to the installation of a pelican crossing, some changes to parking (waiting and loading) and zigzag lines. The footway outside the school looks set to remain as a very narrow and constrained space (Figure 7). Is this the best that can be done to encourage a shift from the car to cycling (or walking) for shorter journeys? Is the full opportunity, afforded by this new development, actually being taken? What would this proposal have looked like had the Cycling Strategy not been published?

It is difficult to see how the proposals for the new schools at either Belmont or for Hackbridge reflect the borough's adopted 'modal-hierarchy', let alone reflect any aspiration to see a reduction in traffic.

Figure 7: Consultation plan for London Road, Hackbridge.

"The London Borough of Sutton are proposing to make Traffic Management Orders the effect of which is to introduce 'at any time' waiting & loading restrictions including school keep clear markings in London Road, Hackbridge outside the new Hackbridge Primary School development and also installation of a Pelican Crossing at the same location".

*LB of Sutton, February 2019*



In concluding the review of the Cycling Strategy, one specific traffic reduction objective has been identified. This objective could be summarised as follows: It is proposed to identify neighbourhoods where it is appropriate to create reduced or traffic free environments in residential areas, or create 'low-traffic' zones with filtered permeability.

Moving on to the Sutton Local Plan, what does this have to say about traffic reduction?

### 4.3 Traffic reduction and the Local Plan

The Sutton Local Plan 2016-2031 was adopted in February 2018<sup>30</sup>. Its purpose is to set out and deliver the council's long-term aims and aspirations for the borough, and to provide a consistent basis for deciding planning applications. in terms of new regeneration areas; new housing development; retail, office and industrial development and employment opportunities; infrastructure provision; protection of green space; reducing pollution and climate change and improving transport<sup>31</sup>. To quote from the Sutton Planning Policy Team (1 March 2018)<sup>32</sup>, "the Local Plan carries full weight in the consideration of planning applications".

It should be noted that this latest version of Sutton's Local Plan was adopted two years after the release of the current London Plan (March 2016) and three months after the

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publication, in December 2017, of the Consultation Draft on a new London Plan. As such, the Sutton Local Plan was almost immediately outdated at the time of its publication. It is hoped that the document will be updated to reflect the new London Plan, publication of which is expected later in 2019<sup>33</sup>.

At almost four-hundred pages, the Sutton Local Plan is by far the longest of the three policy documents referred to in the borough's draft third LIP as a document that sets out the key borough traffic reduction objectives. Perhaps not surprisingly, therefore, the word 'traffic' appears more times in the Local Plan (ninety occurrences) than in the Sustainable Transport Strategy and the Cycling Strategy put together. However, phrases such as 'traffic reduction' or 'reduction in traffic' are absent from the document.

### 4.3.1 Pass the buck, and then move the goal posts?

In its introduction, the Sutton Local Plan notes that a principle influence on the Local Plan is the council's overarching strategy document, the **Sutton Corporate Plan 2014/15 - 2018/19**<sup>34</sup>. The Sutton Corporate Plan details seven priorities, one of which is 'Making Sutton more attractive and sustainable to build on our reputation as a green borough' with an associated action 'Encourage greater use of sustainable modes of transport through our Sustainable Transport Strategy'. One of the linked key measures of success for this objective is '**Reduce the % of journeys that are taken by car**' (although no measure or target for this objective is given). As already discussed, the objectives set out in the STS do not specifically relate to traffic reduction<sup>35</sup> and there are no traffic reduction targets. Nevertheless, as the Sutton Local Plan references the Sutton Corporate Plan, a Plan that declares a reduction in the percentage of journeys taken by car would be an indicator of success, perhaps the Local Plan could be considered as a policy document that includes (or alludes to) having borough traffic reduction objectives? Or is it all a bit nebulous? Well, yes, if for no other reason than that particular Corporate Plan (2014/15 to 2018/19) no longer applies.

What happened to the Sutton Corporate Plan 2014/15 – 2018/19 anyway? Were the priorities it espoused reviewed and reported on? One recent search for Corporate Plan on the Sutton Council website returned a page that declared the decision status 'abandoned' for a new corporate plan for the period 2018-2022. Another search returned the 'Satisfaction and Performance' area of the website, with included a link to other 'plans' one of which being the Sustainable Transport Strategy. So around we go.

It would appear that the latest five-year plan for Sutton is now embraced in 'Ambitious for Sutton 2018-2023'<sup>36</sup>. Unlike its predecessor, this latest plan does not define key success measures (such as 'reduce the % of journeys that are taken by car'), but describes themes and programmes that will guide the council to focus on residents' priorities. So out goes the measure 'reduce the % of journeys that are taken by car', and in comes the ambition to 'Implement selective road improvement schemes to reduce congestion and benefit all road users across the borough'. A change in emphasis that would suggest the desire to achieve a reduction in overall traffic has been somewhat diluted.

### 4.3.2 Challenges, Visions and Objectives

The 'Challenges, Visions and Objectives' section of the Sutton Local Plan 2016-2031 headlines thirty trends. These trends include: 'the population is increasing'; 'car ownership is high but steady'; 'Sutton's commuting to the wider south-east is increasing'; 'the percentage of people cycling to work is low but rising slightly'; 'the percentage of people

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walking to work is falling'. Two of the five key challenges are identified as 'How to manage change on town centre high streets' and 'How to meet transport and other infrastructure needs to support growth'.

The Sutton Local Plan Vision notes: "By 2031, many more new homes will have been built to provide for Sutton's growing population"; "Moving about Sutton will have become easier, quicker and more comfortable", and "The borough's cycle network will be more extensive and safer making short trips by bicycle much more attractive and it will be safer and more pleasant to walk to different destinations within the borough".

To deliver on this vision, twenty-two objectives are listed. Three of these relate to Sutton's Linkages: 'To improve public transport within the borough and across south London, and secure improvements to the road network to address the impacts of new development where necessary'; 'To enhance cycle routes'; 'To improve footpaths and encourage walking'.

Forty 'Planning Policies' are cited within the Sutton Local Plan, with strong emphasis on the development of the **London Cancer Hub** in Belmont, a kilometre or so south of Sutton station (as Policy 2), and regeneration of **Sutton town centre** (as Policy 3).

#### 4.3.3 London Cancer Hub

According to the Local Plan the **London Cancer Hub** development (a £350million life-science campus, with the total transformation from Sutton Hospital site expected to cost in excess of £1billion over the lifetime of the project<sup>37</sup>, and projected to ultimately contribute £1.2billion to the UK economy each year<sup>38</sup>) could see the number of people working on the site increase from the current 3,000 to around 9,500 (although this figure was nearer 11,500 in the **Sutton 2031** documentation of April 2016). "Making the case for better public transport and connectivity within the site, securing investment in infrastructure, enabling sustainable transport, better traffic and parking management in and around the site", is cited in the Local Plan as a transport benefit of the project.

In support of this benefit, a list of possible transport improvement measures is provided for each 'development wave' of the London Cancer Hub. In wave 1, these include "Improvements to four road junctions in the immediate vicinity" and "Cycling improvements from Sutton Town Centre along Brighton Road". It would be good to think that these 'cycling improvements' would deliver protected space for cycling on Brighton Road, but that sort of improvement appears to be way beyond the thinking associated with this major site. In development wave 2 there is only talk of "Improvements to six road junctions further from the development site" and a "Review of pedestrian, cycling and bus requirements".

Nothing about traffic reduction for this site in the Local Plan, although TfL's 'London Cancer Hub, transport issues and options report' (one of the documents forming the evidence development framework)<sup>39</sup> notes that measures should be adopted to discourage car use, including "restricting parking permits for those who are commuting by car from a location where the site can be accessed within a reasonable timescale by walking, cycling or public transport" and that it is "likely that the amount of parking on site will need to be restricted to ensure the mode share targets proposed for development can be achieved". The issues and options report goes on to note "car use [to and from the site] is expected to increase even with the mode share targets proposed".



### 4.3.4 Sutton town centre

Local Plan strategic objectives associated with **Sutton town centre** include 'To enhance cycle routes', and 'To improve footpaths and encourage walking'. Okay, but not particularly aspirational. It is certainly the case that considerably more than this will be required in any proposals the council develops in relation to a Liveable Neighbourhood funding bid submission. Thankfully, in terms of infrastructure, the plan notes the council will "work to improve east-west pedestrian and cycle movements" and "seek to transform the existing gyratory system to make the roads less traffic dominated". Nevertheless, terminology such as "work to improve" and "seek to transform", especially when used in reference to strategic objectives, does not give any great confidence that anything is about to change. "Work to..." and "seek to..." lack determination, and use of these phrases suggests an element of "we will try, but can't guarantee we will succeed".

### 4.3.5 Traffic reduction, or traffic growth?

So, what does the Sutton Local Plan have to say about the key borough traffic reduction objectives? The answer is pretty much nothing. In fact, the opposite could be said to be true. **There is mention of 'zero traffic growth'** (in reference to the London Plan 2016). There are also phrases such as "dependent on future traffic growth" (in relation to a traffic management scheme in Carshalton and the possibility of diverting westbound HGVs via Ruskin Road to relieve congestion and improve safety on the A232 at Carshalton ponds), and "[the] existing problem but will be influenced by **the level of traffic growth**" in relation to a parking and loading review and the borough's parking strategy.

### 4.3.6 Traffic flow appears to be the priority

A closer look at references to 'traffic' in the Local Plan, in a similar way to the analysis of the Sustainable Transport Strategy and the Cycling Strategy, finds that the top reference to 'traffic' appears in the phrase '**traffic flow**' (no fewer than thirty-one times). 'Traffic flow' features in such sentences as: "The council will work with Transport for London to relieve **traffic flow**" (with reference to Carshalton), and "The council would like to see measures which improve **traffic flow** around **Rosehill roundabout**".

But the most often use of the phrase '**traffic flow**' is within the 'Site Allocations' (Policy 40) section of the document. Each site allocation profile includes the heading "Any development scheme should pay particular regard to..". For many of the sites there is a variant on the phrase "Ensuring **traffic flow** onto the road network is not unduly affected". A summary of these references to 'traffic flow' is given in Table 2. In a nutshell, the Local Plan's relationship with traffic, per se, could be summed-up in the sentence:

**"Any development scheme should pay particular regard to assessing the impact of possible increased traffic movements and implementing traffic improvement measures where necessary".**



Table 2: Traffic related phrases used in the Site Allocations (Policy 40) section of the Sutton Local Plan in sentences that begin “Any development scheme should pay particular regard to....”:

Ensuring the <b>traffic flow</b> on	Cheam Road	is not unduly affected
Ensuring the <b>traffic flow</b> to	London Road	is not unduly affected by any increase in vehicular movements
Ensuring <b>traffic flow</b> to	Rose Hill	
Ensuring <b>traffic flow</b> onto	A237	
Ensuring <b>traffic flow</b> on	the road network	
Ensuring <b>traffic flow</b> on	Denmark Road	
Ensuring that <b>traffic flow</b> to	Fellowes Road	
	Hawthorn Road	
	the local roads network	
	Carshalton Road	
	Wrythe Lane	
	Westmead Road	
	Stafford Road	
	Radcliff Gardens	
	Brighton Road	
	Homeland Drive	
	Mill Green Lane	
Ensuring safe access to the site from	Stafford Road	and that <b>traffic flow</b> is not unduly affected
Ensuring safe access onto	Malden Road	

All this raises the question, what exactly is the mechanism behind “ensuring traffic flow is not unduly affected” anyway? Could it refer to making sure that the carriageway is wide enough for the anticipated volume of traffic generated by the re-development? Of perhaps it could mean posting a 40mph speed limit to, from, and within the car park of a site to avoid dilly-dallying on the premises?

#### 4.3.7 A lot of traffic

In addition to ‘traffic flow’, the other phrases used in the Local Plan that include the word ‘traffic’ are summarised, against the number of times they occur, in Table 3. Again, all that mention of ‘traffic’, but nothing about traffic reduction! Where, exactly, are the traffic reduction objectives?

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Table 3: Summary of phrases that include the word 'traffic' in the Sutton Local Plan, against the number of occurrences

Phrase	Number of occurrences
Traffic flow	31
Traffic management	12
Traffic growth (Dependent on future / the level of / zero car)	8
Traffic congestion	5
Traffic dominance	5
Traffic improvement measures / improvements	4
Traffic movement(s)	3
Traffic levels	2
Traffic issues	2
General traffic (Removal of / divert)	2
Traffic noise	2
Traffic junction	1
Traffic route	1
In the event of traffic	1
(generate) traffic	1
Traffic (not impacting on surrounding area)	1
(Improving access for) traffic	1
Extraneous traffic	1
Traffic modelling	1
(Heat generated by...) traffic	1
Traffic / environmental problem	1
(cater for) increased traffic	1

It would appear that when it comes to traffic, the Local Plan is essentially all about assessing the impact of developments in relation to possible increased traffic movements, and then implementing traffic improvement measures to ensure that the traffic flow on any road in the borough is not unduly affected. Not quite the same as having traffic reduction objectives.

## 5 Conclusions

The Mayor's Transport Strategy (March 2018) has an overarching aim for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, compared to 63% today. In response to the Mayor's Transport Strategy, and the requirement that London boroughs plan for reducing car traffic, Sutton's draft third Local Implementation Plan admits that the borough does not have a separate traffic reduction strategy but that the key borough traffic reduction objectives are set out in other policy documents (the Sustainable Transport Strategy, the Cycling Strategy, and the Local Plan).

Sutton's Sustainable Transport Strategy (LB of Sutton, June 2015), Cycling Strategy (LB of Sutton, November 2015), and Sutton Local Plan (LB of Sutton, February 2018) have been reviewed in an attempt to identify the borough's key traffic reduction objectives.

Sutton's draft third LIP includes trajectories for 2041 (baseline 2015) that reflect the MTS targets for a reduction in annual vehicle kilometres, of between 10% and 15%, and a reduction in the number of vehicles owned of around 6,500 (commensurate with a target of 250,000 fewer vehicles owned London-wide). This is set against an expected rise in Sutton's resident population from 202,200 in 2016 to 222,200 in 2031.

The LIP details some long-term transport schemes, including the Sutton Link (tram or Bus Rapid Transit) project, several Sutton town centre schemes and the London Cancer Hub development. The main drivers for achieving any reduction in car ownership, and car use, are the Sutton Link project, and the concentration of housing development in locations where transport accessibility is currently high.

In the short and immediate term, LIP schemes appear to reflect the borough's ongoing stance of being reactive rather than proactive. For the first year of the third LIP, 2019-2020, the speed and volume of traffic is to be investigated in just two locations. These locations represent about one-third of one percent of the entire borough street network, and the schemes are only being included due to the concern to residents at this point in time. This would suggest a business as usual scenario, seemingly ignoring the impact that cut-through traffic is having on many residential areas of the borough (and has been having for a considerable time).

The council's support of a Road User Hierarchy which prioritises consideration of cyclists and pedestrians above local and non-local motorised traffic, as identified in the Sustainable Transport Strategy and again referred to in the Cycling Strategy, could be considered as reflecting a desire to see traffic reduction. However, there is little evidence that this 'modal hierarchy' is actually being used in the borough's transport schemes.

The indicators outlined in the Sustainable Transport Strategy (which include 'mode share', 'road traffic casualties', and 'air quality') were adopted through the Sutton Transport Plan (LIP) dating from 2010. For the 2018 LIP to refer to the STS as the way forward is not, therefore, particularly aspirational.

The Cycling Strategy provides the context in terms of less traffic, low-traffic streets, and the prioritisation of vulnerable road users over motorised traffic. A traffic reduction objective has been identified in the strategy, and this relates to identifying residential neighbourhoods where it would be appropriate to create reduced or traffic free environments using filtered permeability. However, with the exception of one residential

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survey carried out during the summer of 2017, north of Sutton town centre in relation to a proposed 'Quietway', there have been no specific discussions or proposals around 'low-traffic zones' in the borough since the publication of the Cycling Strategy over three years ago. Certainly, no reduced or traffic free environments have been delivered or introduced during this time.

The Local Plan essentially states that development schemes should pay particular regard to assessing the impact of possible increased traffic movements and implement traffic improvement measures where necessary. It is difficult to see how this equates to having traffic reduction objectives. There is little evidence to suggest that active travel is being facilitated, and car use reduced, as a result of recent and current major developments in the borough. Opportunities, for whatever reason, appear not to be taken.

The council's support for a 'modal hierarchy', and a commitment to identify locations where it is appropriate to create reduced or traffic free environments in residential areas, as outlined in the policy documents that are identified in the draft third LIP as setting out the borough's key traffic reduction objectives, is recognised. Nevertheless, it is not felt that these objectives are stated prominently enough within the draft third LIP and, without an additional commitment to demonstrate a more proactive engagement with residents to make the case, do not go far enough towards establishing a traffic reduction strategy for the borough. Consequently, it is anticipated that the draft third LIP, in its current format, will not meet with mayoral approval.

Our recommendations for an approved third LIP would be for it to commit to a traffic reduction strategy for the borough, and to include clearly stated traffic reduction objectives. Such objectives could include use of the 'modal hierarchy' and proposals for low-traffic neighbourhoods in the short term. A commitment to work with neighbouring authorities and TfL to understand best practice is also essential, along with evidence of an ability to deliver.

Measures that reduce car dependency, and so free up space for essential freight, business trips, and public transport traffic, as well as help create a healthier community, are more likely to be realised if the focus is on making active travel the easiest choice for short journeys by more people. Of course, if later in 2019 the Chancellor of the Exchequer announces a freeze on fuel duty for the tenth consecutive year, it is likely that the idea of making alternatives to the car more attractive will get a little more challenging. As to where that will take traffic reduction, despite the current endeavours of the Mayor of London, Transport for London, the London boroughs and other delivery partners, only time will tell.

Charles Martin  
On behalf of Get Sutton Cycling, a Sutton borough group of the London Cycling Campaign  
May 2019

## Notes

<sup>1</sup> London Borough of Sutton (2018). **Third Local Implementation Plan – Draft for Consultation (November 2018)**: Environment and Neighbourhood Committee, 20 September 2018 <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5029&Ver=4>>:

Item 14 Sutton Local Implementation Plan '(6) Local Implementation Plan – Appendix A' <[https://moderngov.sutton.gov.uk/documents/s61606/6 Local Implementation Plan - Appendix A.pdf](https://moderngov.sutton.gov.uk/documents/s61606/6%20Local%20Implementation%20Plan%20-%20Appendix%20A.pdf)> (PDF).

<sup>2</sup> Greater London Authority (2018). **Mayor's Transport Strategy 2018** <<https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018>>; Transport for London (2019). **'Guidance for Borough Officers on Developing the Third Local Implementation Plan'** <<https://tfl.gov.uk/info-for/boroughs/local-implementation-plans-for-the-associated>>.

<sup>3</sup> Get Sutton Cycling (2018). **'Our response to Sutton's draft LIP3 consultation'**, <<https://getsuttoncycling.org.uk/2018/12/19/our-response-to-suttons-draft-lip3-consultation/>> 19 December 2018

<sup>4</sup> London Borough of Sutton (2019). **Third Local Implementation Plan – Draft for Mayoral Approval (February 2019)** Environment and Neighbourhood Committee, 7 March 2019: <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5047&Ver=4>> Item 42 Local Implementation Plan Funding Settlement 2019/20 'Local Implementation Plan Funding Settlement 2019-20 – Appendix A' <[https://moderngov.sutton.gov.uk/documents/s64799/Local Implementation Plan Funding Settlement 2019-20 - Appendix A.pdf](https://moderngov.sutton.gov.uk/documents/s64799/Local%20Implementation%20Plan%20Funding%20Settlement%202019-20%20-%20Appendix%20A.pdf)> (PDF).

<sup>5</sup> London Borough of Sutton (2015). **Sustainable Transport Strategy (June 2015)**: <[https://www.sutton.gov.uk/downloads/download/656/sustainable\\_transport\\_strategy\\_documents](https://www.sutton.gov.uk/downloads/download/656/sustainable_transport_strategy_documents)>

<sup>6</sup> London Borough of Sutton (2015). **Cycling Strategy (November 2015)**: <[https://www.sutton.gov.uk/downloads/download/656/sustainable\\_transport\\_strategy\\_documents](https://www.sutton.gov.uk/downloads/download/656/sustainable_transport_strategy_documents)>

<sup>7</sup> London Borough of Sutton (2018). **Sutton Local Plan (February 2018)**: <[https://www.sutton.gov.uk/info/200464/planning\\_policy/1521/local\\_plan\\_adopted\\_2018](https://www.sutton.gov.uk/info/200464/planning_policy/1521/local_plan_adopted_2018)>

<sup>8</sup> London Borough of Sutton (2015). Sustainable Transport Strategy (LB of Sutton, June 2015) <[https://www.sutton.gov.uk/downloads/download/656/sustainable\\_transport\\_strategy\\_documents](https://www.sutton.gov.uk/downloads/download/656/sustainable_transport_strategy_documents)> notes that the 2009/10-2011/12 baseline average mode share for cycling (1%), walking (28%) and public transport (16%) giving a combined share of 45%. The short-term (2017) target is given as 49.4% (2.2%, 29.6%, 17.6% respectively) and in the long term (2025) to 56% (4%, 32%, 20% respectively). In June 2018, the date to achieve a mode share target for cycling of 2.2% was changed from 2017 to 2020 with no explanation given. (See **'(6) Update on Sustainable Transport Strategy – Appendix C'** (PDF) as reported at the **Environment and Neighbourhood Committee 28 June 2018** <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5022&Ver=4>>)

<sup>9</sup> London Borough of Sutton (2018). **Equalities Impact Assessment (EqIA) of Third Local Implementation Plan (LIP) Draft for Consultation (November 2018)**: <[https://moderngov.sutton.gov.uk/documents/s64800/Local Implementation Plan Funding Settlement 2019-20 - Appendix C.pdf](https://moderngov.sutton.gov.uk/documents/s64800/Local%20Implementation%20Plan%20Funding%20Settlement%202019-20%20-%20Appendix%20C.pdf)>

<sup>10</sup> London Borough of Sutton (2019). **Population Projections** <<https://data.sutton.gov.uk/population/>> (accessed 19 April 2019)

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<sup>11</sup> Greater London Authority (2018). **Guidance for Borough Officers on Developing the Third Local Implementation Plan** <<https://tfl.gov.uk/info-for/boroughs/local-implementation-plans>>.

<sup>12</sup> Greater London Authority (2018). **Mayor's Transport Strategy 2018** (page 39) "**Outcome 3:** London's streets will be used more efficiently and have less traffic on them".

<sup>13</sup> London Borough of Sutton. '**Beddington North TfL Major Scheme**', <[https://www.sutton.gov.uk/info/200264/streets\\_roads\\_and\\_highways/1739/beddington\\_north\\_tfl\\_major\\_scheme](https://www.sutton.gov.uk/info/200264/streets_roads_and_highways/1739/beddington_north_tfl_major_scheme)> (accessed 14 May 2019)

<sup>14</sup> **Beddington Lane traffic count** (2017). From a one-hour traffic count (Get Sutton Cycling, 13 June 2017, 07:49 to 08:49), Beddington Lane, north of Guy Road: 1,403 motor vehicles, 14 pedal cycles

<sup>15</sup> London Cycling Campaign / Living Streets (2018) '**Low Traffic Neighbourhoods: An Introduction For Policy Makers**' and '**A Guide To Low Traffic Neighbourhoods**' <<https://lcc.org.uk/pages/low-traffic-neighbourhoods>>

<sup>16</sup> London Borough of Sutton (2019). **Third Local Implementation Plan – Draft for Mayoral Approval (February 2019)** <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5047&Ver=4>> **Section Three: The Delivery and Investment Plan**, Table ST01: Linkages between LIP Projects and Programmes and the Mayor's Transport Strategy outcomes. Project/Programme 8: Sparrow Farm Road Area "...concerns about the speed and volume of traffic using Kingsmead Avenue" (Worcester Park, Nonsuch ward); Project/Programme 9: Woodstock Avenue Area "concerns from residents about the speed and volume of traffic using Woodstock Avenue as a cut through to the A24 London Road" (Stonecot Hill, Stonecot ward). Also see '**First sight of 'Healthy Streets' proposals for Sutton**', Get Sutton Cycling, 12 September 2018: <<https://getsuttoncycling.org.uk/2018/09/12/first-sight-of-healthy-streets-proposals-for-sutton/>>

<sup>17</sup> London Borough of Sutton (2019). **Third Local Implementation Plan – Draft for Mayoral Approval (February 2019)** <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5047&Ver=4>> **Section Two: Borough Transport Objectives**, paragraph 2.33.

<sup>18</sup> London Borough of Sutton (2019). **Environment and Neighbourhood Committee 7 March 2019** <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5047&Ver=4>>

<sup>19</sup> London Borough of Sutton (2016). **BID Matters Newsletter 2**, Successful Sutton, June 2015 (ISSUU) <[https://issuu.com/successfultutton/docs/bid\\_matters\\_newsletter\\_edition\\_2\\_-\\_](https://issuu.com/successfultutton/docs/bid_matters_newsletter_edition_2_-_)>. The BID Matters Newsletter 2 is also referenced to in 'Why didn't Sutton submit a bid for Liveable Neighbourhood funding at the first opportunity? Get Sutton Cycling (7 January 2017) <<https://getsuttoncycling.org.uk/2018/01/07/why-didnt-sutton-submit-a-bid-for-liveable-neighbourhoods-funding-at-the-first-opportunity/>>

<sup>20</sup> London Borough of Sutton (2019). A new and updated **Air Quality Action Plan (2019-2023)** was presented to the Environment and Neighbourhood Committee on 7 March 2019 (Item 39, appendix D): <<https://moderngov.sutton.gov.uk/ieListDocuments.aspx?CId=452&MId=5047&Ver=4>> (the same meeting that included the presentation for the Third Local Implementation Plan, Draft for Mayoral Approval).

<sup>21</sup> Greater London Authority (2013) **Mayor's Vision for Cycling** (March 2013): <<https://www.london.gov.uk/what-we-do/transport/cycling-and-walking/mayors-vision-cycling>>. The document, as a PDF: '[Mayor's Vision for Cycling](#)'.

<sup>22</sup> Transport for London (2014, with update 2016). **London Cycling Design Standards** (November 2014), see TfL Street Toolkit <<https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>>.



<sup>23</sup> Things are potentially set to change in that regard soon, however, with discussions with residents in relation to the proposed Morden to Sutton Quietway expected in April 2019. (There were informal discussions in the immediate neighbourhood of the proposed Quietway close to Sutton town centre during the summer of 2017 when residents were asked for their views of the area, and the streets they lived in, with a particular focus on travel choices, road traffic and the quality of local streets. There were 250 responses to the survey, and this found that “65% of respondents think there is too much traffic in the area, and that traffic is too fast”. See, London Borough of Sutton **Quietways Highways Survey** <<https://www.sutton.gov.uk/quietways>> (accessed 14 May 2019)).

<sup>24</sup> Get Sutton Cycling (2018). ‘**Beddington North TfL Major Scheme: going ahead as planned**’, published, January 2018 <<https://getsuttoncycling.org.uk/2018/01/11/beddington-north-tfl-major-scheme-going-ahead-as-planned/>>

<sup>25</sup> In our response to the consultation on the Third LIP Draft for Consultation, November 2018 (**‘Our response to Sutton’s draft LIP3 consultation’** Get Sutton Cycling, December 2018 <<https://getsuttoncycling.org.uk/2018/12/19/our-response-to-suttons-draft-lip3-consultation/>>), we took issue with the phrase “...likely measures instead of segregating cyclists” (paragraph 2.37, page 18). We were concerned that this implied protected space for cycling was not likely to be provided, and highlighted that this was at odds with the borough’s Cycling Strategy. Possibly as a result of our comments, the wording in the updated Draft Third LIP Consultation for Mayoral Approval, February 2019, is subtly different. It reads “..likely measures, including where segregating cyclists is impractical due to roadspace constraints” (paragraph 2.43, page 20).

<sup>26</sup> Get Sutton Cycling (2016). ‘**Felnex redevelopment – an acid test for cycling**’, June 2016 <<https://getsuttoncycling.org.uk/2016/06/24/felnex/>>

<sup>27</sup> Get Sutton Cycling (2018). ‘**Number plates for students who cycle to and from Stanley Park High**’, October 2018 <<https://getsuttoncycling.org.uk/2018/10/02/number-plates-for-students-who-cycle-to-and-from-stanley-park-high/>>

<sup>28</sup> **Brighton Road traffic count** (2017). Traffic counts carried out by Get Sutton Cycling during peak periods on weekday mornings in July 2017 (prior to the opening of the new school Harris Sutton Academy (year 7) in September 2018), indicated that Brighton Road carried around 1,500 vehicles an hour, and Chiltern Road around 650 vehicles an hour, at these times.

<sup>29</sup> **London Road traffic count** (2017). Traffic counts carried out by Get Sutton Cycling during a late afternoon period on a weekday in June 2017 suggest that around 1,400 vehicles an hour use London Road at these times.

<sup>30</sup> London Borough of Sutton (2018). **Sutton Local Plan (February 2018)**: <[https://www.sutton.gov.uk/info/200464/planning\\_policy/1521/local\\_plan\\_adopted\\_2018](https://www.sutton.gov.uk/info/200464/planning_policy/1521/local_plan_adopted_2018)>

<sup>31</sup> London Borough of Sutton (2018). **Ambitious for Sutton 2018-2023**, November 2018: “Implementation of the Local Plan” is one of twenty-nine commitments associated with ‘Being Active Citizens’ so that “all residents live healthy lifestyles and are enabled to be economically, socially and physically active”. <<https://moderngov.sutton.gov.uk/documents/s60425/Commissioning%20and%20Financial%20Planning%201920%20to%202122%20-%20Appendix%20B.pdf>>

<sup>32</sup> Extract from an email, with subject ‘**Adoption of the Sutton Local Plan**’, 1 March 2018, from the Planning Policy Team, LB of Sutton, sent to stakeholders: “I am writing to inform you that the Sutton Local Plan was adopted by Full Council on 26 February [2018]. The Local Plan sets out the planning strategy and policies for the London Borough of Sutton until 2031 and includes an appendix, which details the land designations which will appear on the Policies Map. As it is now adopted, the Local Plan carries full weight in the consideration of planning applications”. [www.sutton.gov.uk/localplan](http://www.sutton.gov.uk/localplan).

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<sup>33</sup> Greater London Authority (2019). **Draft London Plan 2019**, Policy T1 Strategic approach to transport, notes that "Development Plans and development proposals should support the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041", and "...an integrated strategic approach to transport is needed, with an **ambitious aim to reduce Londoners' dependency on cars** in favour of increased walking, cycling and public transport use. Without this shift away from car use, London cannot continue to grow sustainably". < <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0> > accessed 14 April 2019.

<sup>34</sup> London Borough of Sutton (2019). **Sutton's Corporate Plan 2014/15 - 2018/19** (accessed 8 May 2019) <[https://www.sutton.gov.uk/downloads/file/1298/suttons\\_corporate\\_plan\\_201415\\_-\\_201819](https://www.sutton.gov.uk/downloads/file/1298/suttons_corporate_plan_201415_-_201819)>.

<sup>35</sup> London Borough of Sutton (2015). **Sustainable Transport Strategy** (LB of Sutton, June 2015) <[https://www.sutton.gov.uk/downloads/download/656/sustainable\\_transport\\_strategy\\_documents](https://www.sutton.gov.uk/downloads/download/656/sustainable_transport_strategy_documents)>: Objective 1 includes the action: "Implement **selective road improvement schemes** to reduce congestion and benefit all road users e.g. Beddington Lane". Objective 2 includes an outcome "to reduce the number of pupils being driven to school and encourage greater use of sustainable transport", by developing and promoting **school travel plans**. Objective 4 has a focus on pollution, "to implement measures set out in the Air Quality Action Plan focusing on pollution 'hot spots' e.g. **reduce speeds and congestion, smoother driving**, cleaner vehicles".

<sup>36</sup> London Borough of Sutton (2018). '**Ambitious for Sutton 2018-2023**' (LB of Sutton, November 2018): "Implementation of the Local Plan" is one of twenty-nine commitments associated with 'Being Active Citizens' so that "all residents live healthy lifestyles and are enabled to be economically, socially and physically active". <<https://moderngov.sutton.gov.uk/documents/s60425/Commissioning%20and%20Financial%20Planning%201920%20to%202122%20-%20Appendix%20B.pdf>>

<sup>37</sup> Transport for London (2016). '**London Cancer Hub: transport issues and options report**', TfL, August 2016 <<https://tfl.gov.uk/corporate/transparency/freedom-of-information/foi-request-detail?referenceId=FOI-1169-1718>> (accessed 2 April 2019)

<sup>38</sup> Building Better Healthcare (2019). '**Land deal makes London cancer hub a reality**' Building Better Healthcare, 19 January 2019 <[https://www.buildingbetterhealthcare.co.uk/news/article\\_page/Land\\_deal\\_makes\\_London\\_cancer\\_hub\\_a\\_reality/150524](https://www.buildingbetterhealthcare.co.uk/news/article_page/Land_deal_makes_London_cancer_hub_a_reality/150524)>

<sup>39</sup> Transport for London (2016). '**London Cancer Hub: transport issues and options report**', TfL, August 2016 <<https://tfl.gov.uk/corporate/transparency/freedom-of-information/foi-request-detail?referenceId=FOI-1169-1718>> (accessed 2 April 2019)