Appendix 2 - LBWF Local Implementation Plan – Consultee Comments and Responses

Respondent	Comment	Response
Transport for London	Please provide an explanation as to why car ownership has increased by 7% between 2013 and 2016.	Challenges and opportunities for Section 2 (Borough Transport Objectives) have been updated in response to comment.
	Schools as well as businesses should be referenced in objective 1.	LBWF Overall Objective 1: Shift to culture of sustainable travel has been updated in response to comment.
	Outcome 1: Please identify benefits for walking more clearly in the objectives' commentary.	Challenges and opportunities for Outcome 1 (London's streets will be healthy and more Londoners will travel actively) has been updated in response to comment.
	Outcome 3: Objective 3.4 refers to enabling all residents to access car clubs. This could potentially counteract mode shift measures by attracting existing walking, cycling and public transport trips to car. Proposal 19 of the MTS states that car clubs should be supported when paired with a reduction in parking. This should be clarified in the final draft.	LBWF Objective 3.4 –To deliver a deliver a car club network that supports reduction of car ownership has been updated in response to comment.
	Outcome 6: Please refer to interventions which can address mobility barriers beyond step-free issues (as identified in the challenges section) in the objectives – e.g. providing places to sit for interchange between rail and bus, and busto-bus interchange.	Outcome 6 (Public transport will be safe, affordable and accessible to all) has been updated in response to comment.
	Outcomes 8 and 9: The reference to MTS Policy 23 in the context of outcome 8 is not appropriate. The relevant MTS Policy for outcome 8 is Policy 21 (as used for outcome 9). Please amend this.	Challenges and opportunities for Outcome 8 (Active, efficient and sustainable travel will be the best option in new developments) has been updated in response to comment.
	Outcomes 8 and 9: Please reference freight and servicing	Challenges and opportunities for Outcome 8 and 9 have

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	at new developments in the objectives.	been updated in response to comment.
	General: A 2021 mode share target needs to be set and 2021 targets should be set for all the other outcomes based on the borough data pack trajectories.	2021 modeshare target has been included within ST07 - Borough outcome indicator targets.
Metropolitan Police	The Metropolitan Police have requested that Secured by Design (SBD) conditioning be implemented as a core feature for new builds within the Borough. We have also given advice about encouraging our early involvement with the Liveable Neighbourhoods Scheme that covers both Waltham Forest and Newham. We seek to reiterate this position and explain further below why our involvement, especially at the early design stages, can be integral to the enhancement of the transport improvements planned for Waltham Forest.	Comment noted. The borough will seek to continue to engage actively with the Metropolitan Police in the design and implementation of transport schemes. Outcome 2 has been updated to reflect this.
	In relation to the Crime Prevention aspects of the designs in public or residential areas; any advice given by our Traffic Management Unit (TMU), Counter Terrorism Security Advisors (CTSAs) or British Transport Police (BTP) DOCOs regarding road layout and safety should also be implemented within the plans.	The borough will seek to continue to engage actively with the Metropolitan Police Traffic Management Unit (TMU), Counter Terrorism Security Advisors (CTSAs) or British Transport Police (BTP) DOCOs teams in the design and implementation of transport schemes. Outcome 2 has been updated to reflect this.
	We support the Adopt Vision Zero Objective and the aim to reduce crime and the fear of crime linked to transport systems. However, the data provided relates to injuries caused by vehicles, but does not appear to include any data relating to thefts of/from vehicles or vehicle-enabled crime.	As part of individual projects we do look at local crime statistics where possible to identify hot spots. Through improvements to the public realm this increases community cohesion, ownership and pride, and evidence shows that areas that look and feel better tend to attract less crime and ASB. We consider personal security measures as part of our neighbourhood schemes such as additional CCTV and lighting, which can act as deterrents to crime.

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	The proposed increase in Secure Cycle Hubs across the Borough is welcomed. However careful placement, details of the materials used, access control systems and further crime mitigation factors are all important factors to ensure they remain secure for the lifetime of their build and encourage their regular use.	Security of cycle hubs is a key consideration of the location and design of cycle hubs, and these are applied at the design and implementation stage of implementation.
	Consideration should be given to all public realm lighting, landscaping, footpath width and sightlines (to help improve natural and active surveillance), especially considering that public spaces can suffer from higher levels of Anti-Social Behaviour (ASB) and Violence and Sexual Offences. Open Spaces should be designed to encourage their use by legitimate users, but reduce the opportunity for congregation of or intimidation by large groups and hiding spaces for weapons and drugs.	Security of public spaces is a key consideration of the location and design of cycle hubs, and these are applied at the design and implementation stage of implementation.

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	We would recommend the following Objective to be included within the Local Implementation Plan:  "Ensuring Safety and Security through Design: The design and layout of the physical environment and physical building security is key to creating safe environments and reducing crime and disorder. Designing Out Crime Accreditation (via the Secured by Design or the Secured Environments Scheme) and the incorporation of its principles should be integral to the process. Evidence outlining this and discussion with the relevant Designing Out Crime Officer, Transport Management Unit Officer and Counter Terrorism Security Adviser should form part of planning any new development, town centres, public spaces, transport hubs and streets at the earliest opportunity."	Comment noted. Additional objective will be added to Outcome 2 to include comments.
	Would like to see a reference to 'motor traffic reduction measures' in the spreadsheet line on Lloyd Park area	Proforma A spreadsheet details that the Lloyds Park scheme states that proposals to reduce traffic volume and speed are to be investigated.
London Cycling Campaign	Porosity (there is no mention in the LIP). Assessment of active travel severance due to major roads: the solution is more and better pedestrian & cycle crossings of main roads, especially between filtered areas if we are to reap the full benefits of the MH infrastructure in terms of increased cycling modal share.	The borough is committed to delivering improvements to the walking and cycling network, as shown on the network maps. As part of the ongoing development of this network the Council will continue to use established tools such as area porosity, Cycle route mesh density and TfL's emerging cycle route quality criteria to determine where specific schemes and interventions are required.  Overcoming main road severance is clearly essential to

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		delivering this network, and identifying where new and improved crossings are required will form part of the detailed scheme development process for individual projects. Specific details, such as location and type of new crossings, will be assessed based on the location and constraints of schemes.
		As detailed in Outcome 1, the borough is committed to introducing new high quality cycle infrastructure as well as improving the quality of existing cycle infrastructure in the borough.
	Crossovers where physical/visual priority is inadequate and we risk unnecessary cycle casualties and adverse publicity which could impact public perception of cycling as adequately safe to deliver a substantail modal shift. Quite a few examples such as sections of Lea Bridge Rd (Lammas Rd, Rigg Approach, Heyrbidge Way - including HGV risks), both sides of new Ferry Lane tracks, Whipps Cross Rd Hollow Ponds car park crossovers)	The Council has developed a set of standard and highly regarded design principles for key walking and cycling infrastructure, such as side road junction treatments, but each and every location is assessed individually and on its own merits as part of the detailed design process on each project to ensure an appropriate solution is adopted. Where large numbers/proportion of HGV's movements are expected in and out of side roads (due to the presence of industrial premises, etc) and these cannot realistically be reduced in the short term, the Council must take practical access, maintenance and material durability issues into consideration when determining the appropriate design solution. Where previous schemes have been introduced and design decisions have been made primarily due to budgetary considerations these will be reviewed and updated wherever possible, and provision has been made within the delivery plan to do this on several routes. Where further adjustments and improvements first require a change in traffic composition,

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		these will be reviewed as opportunities arise.
	Measures to address or mitigate against loss of physical protection - Forest Rd around Century Rd, Palmerstone Rd junction.	Several of these are currently under further investigation by the Council with a view to progressing adjustments to address the issues raised. These may be funded in the future through TfL LIP funding or through other funding opportunities.
	Improving attractiveness of walking - reallocating carriageway space, decluttering footways of street furniture. For the latter, the 20mph rollout offers huge potential in the south of the borough for a better pedestrian experience. At the Healthy Streets conference one presentation focussed on how you needed minimum footway widths of 2.5m to make walking really attractive.	Challenges and opportunities for Outcome 1 (London's streets will be healthy and more Londoners will travel actively) has been updated in response to comment. Commitment to roll out of 20mph is made within the LIP.  The Council are committed to improving the pedestrian experience in the borough through interventions such as decluttering and footway widening. Specific details, such as widths, will be assessed based on the location and constraints of schemes.
	Alternatives to Car Use and Ownership: could add in the expansion of the hanger programme, ground anchors for cargo bike parking	Improvement in cycle parking across the borough has been included within Outcome 1. This includes expansion of hanger programme, and delivering cargo bike and accessible bike parking.
	Potential to deal with several issues with one go - workplace parking levy/reductions/restrictions led by action on WF council itself, but also local PCT sites - hospital, GPs and schools etc. In other words, commitment to work with local public bodies to lead by example?	Comment noted, and added to commentary in Outcome 3.

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MET Police Road Safety Team	The Metropolitan Police Service is committed to Vision Zero, making the roads even safer and reducing the numbers of people killed and seriously injured. We will continue to work closely with Waltham Forest Council.	