



The Planning Inspectorate

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# **Report to the Secretary of State for Transport**

**by Alan Boyland BEng(Hons) DipTP CEng MICE MCIHT MRTPI**

**an Inspector appointed by the Secretary of State for Transport**

**Date: 44 November 2014**

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**CYCLE TRACKS ACT 1984**

**THE CYCLE TRACKS REGULATIONS 1984**

**THE LONDON BOROUGH OF WANDSWORTH  
(WANDSWORTH COMMON)  
CYCLE TRACKS ORDER 2013**

**THE LONDON BOROUGH OF WANDSWORTH  
(TOOTING BEC AND TOOTING GRAVENY COMMON)  
CYCLE TRACKS ORDER 2013**

Date of Inquiry: 30 September 2014

Ref: DPI/H5960/14/15

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## CASE DETAILS

### Wandsworth Common

- The Order was made on 2 July 2013 under Section 3(1) of the Cycle Tracks Act 1984, and is known as the London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2013.
- The Order was published in July 2013, and at the commencement of the local Inquiry there was one objection outstanding to it.
- The Order, if confirmed, would grant authority to designate various lengths of existing segregated cycle track as unsegregated cycle track.

**Summary of Recommendation: That the Order be confirmed.**

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### Tooting Bec and Tooting Graveney Commons

- The Order was made on 25 June 2013 under Section 3(1) of the Cycle Tracks Act 1984, and is known as the London Borough of Wandsworth (Tooting Bec and Tooting Graveney Common) Cycle Tracks Order 2013.
- The Order was published in July 2013, and at the commencement of the local Inquiry there were three objections outstanding to it.
- The Order, if confirmed, would grant authority to designate various lengths of existing segregated cycle track as unsegregated cycle track.

**Summary of Recommendation: That the Order be confirmed.**

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## 1. PREAMBLE

### Objections

- 1.1 Within the statutory objection period there was one objection relating to both Orders<sup>1</sup> and a further two objections to the Tooting Bec and Tooting Graveney Common ('Tooting Common') Order alone<sup>2</sup>. At the close of the Inquiry none of these had been withdrawn.

### Other representations

- 1.2 Within the statutory objection period there were two expressions of support, one relating to each Order<sup>3</sup>.
- 1.3 Between publication of the notice of the Inquiry and the close of the Inquiry there were 51 further written representations<sup>4</sup> as follows:
- 33 broadly supporting one or both Orders;
  - 15 broadly opposing one or both Orders; and
  - 3 broadly neutral.

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<sup>1</sup> Inquiry doc. OBJ/3

<sup>2</sup> OBJ/1 & OBJ/2

<sup>3</sup> SUP/1 & SUP/2

<sup>4</sup> REP/1 – REP/51

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These numbers do not include the further submissions by those bodies and individuals who had already objected or expressed support during the statutory objection period<sup>5</sup>.

## **The Inquiry**

- 1.4 The Inquiry sat for 1 day on 30 September 2014. I had made an unaccompanied familiarisation visit to the tracks concerned on the previous day. On 1 October 2014 I made a more extended and detailed inspection of the tracks and their surroundings, again unaccompanied.

## **Procedural Matters**

- 1.5 At the Inquiry the Order Making Authority (the Council) confirmed that it had complied with all the statutory formalities, and this was not challenged.
- 1.6 However, in its objection the Open Spaces Society had claimed that it was not clear that the Tooting Common Order as originally published, with a title referring only to Tooting Bec Common, also included Tooting Graveney Common<sup>6</sup>. The Council advised that this reflected the terminology of the previous confirmed Order<sup>7</sup>. Nevertheless, while taking the view that the original Order was not misleading or unclear as the two Commons are now 'to all intents and purposes one', the Council had republished the Order and Notice amended to refer to both. It also extended the objection period, but did not re-advertise the Order as it did not consider this to be necessary<sup>8</sup>.
- 1.7 The Open Spaces Society also claimed in its objection that the Notice was misleading as it suggested that only the 1.5m width of the existing cycle track was to become unsegregated<sup>9</sup>. This is a matter of law, but I recognise that taken literally in isolation it could be interpreted in that way. Nevertheless, it seems to me that the word 'unsegregated' indicates that the whole path would be available to both pedestrians and cyclists. This is consistent with DfT guidance on shared use routes<sup>10</sup>.
- 1.8 No issues were raised in these respects by any other person or body either before or at the Inquiry, and the Open Spaces Society did not pursue these matters at the Inquiry. I am satisfied that no-one's interests were adversely affected.

## **This Report**

- 1.9 This report sets out a brief description of the tracks and their surroundings, followed by the gists of the cases for the Order Making Authority, the objectors and supporters, and the comments made by others (in writing and at the Inquiry). It then sets out my conclusions and recommendations. Lists of those who appeared at the Inquiry and of the Inquiry documents are appended. In footnotes I give references to the elements of the documents on which I have drawn.

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<sup>5</sup> OBJ/2.1, OBJ/3.1, SUP/1.1, SUP 2.1

<sup>6</sup> OBJ/2

<sup>7</sup> The London Borough of Wandsworth (Tooting Bec Common) Cycle Tracks Order 2000 (CD11)

<sup>8</sup> WBC/1 para 5.1.1

<sup>9</sup> OBJ/2

<sup>10</sup> Local Transport Note 1/12 (CD3 para 10.20); WBC/1 para 5.1.2

## **2. DESCRIPTIONS OF THE ROUTES AND THEIR SURROUNDINGS<sup>11</sup>**

- 2.1 The routes are described in the Orders and shown on the Order Plans<sup>12</sup>. For the most part they comprise hard-surfaced paths some 3m wide across mainly open and wooded areas of the Commons, with the existing cycle track being indicated by white line markings, cycle symbols on the track surface (with pedestrian symbols on the remaining part) and regulatory signs indicating that the routes are segregated for use by pedal cycles and pedestrians only. In some places there are additional signs advising that cyclists should give way to pedestrians.

### **Wandsworth Common**

- 2.2 The routes form a rough X-shape, meeting at a footbridge over the railway line in the centre of the Common. East of the railway two legs run north and a little north of east respectively to Bolingbroke Grove. West of the railway one leg runs in a south-westerly direction to near the end of Routh Road then adjacent to that road, breaking at Trinity Road and continuing to Lyford Road. The final leg runs westwards to near the end of Dorlcote Road, alongside that road to Trinity Road then breaking and continuing on the highway to Heathfield Road near Alma Terrace.

### **Tooting Common**

- 2.3 The single route runs roughly south-north from Furzedown Road opposite Furzedown Drive, crossing Tooting Bec Road at its junction with Dr Johnson Avenue then Bedford Hill near its junction with Hillbury Road, skirting part of Culverton Road then passing through two railway underpasses (with the cycle track changing sides beneath one of them) to Emmanuel Road at its junction with Cavendish Road. Part of the route just north of Tooting Bec Road, known locally as Chestnut Walk, has posts fixed in the centre of the path, which I understand to have been previously part of a barrier, the horizontal rails of which have been removed.

## **3. THE CASE FOR THE ORDER MAKING AUTHORITY (THE COUNCIL OF THE LONDON BOROUGH OF WANDSWORTH)**

*The material points<sup>13</sup> are:*

### *Background*

- 3.1 The routes and widths of the two cycle tracks across Wandsworth Common and Tooting Bec and Tooting Graveney Common have been considered by previous Inspectors at earlier Inquiries<sup>14</sup>. The existing Orders, having been made in 2000, were confirmed and implemented in 2006<sup>15</sup>.
- 3.2 When the tracks had been operational for about a year, in accordance with normal good practice they were subject to a review to establish whether the scheme was functioning correctly and whether any

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<sup>11</sup> Based on my own observations and documents as indicated.

<sup>12</sup> DOC/1 parts 2 & 3

<sup>13</sup> Drawn from oral submissions for the Council and evidence as indicated.

<sup>14</sup> WBC/1 paras 2.2-2.9; CDs 12-15 inclusive

<sup>15</sup> WBC/1 paras 2.5 & 2.9-2.10; CDs 10 & 11

improvements were required. The independent consultants Mayer Brown appointed by the Council to carry out the review examined a number of issues including whether the current segregated shared use operation of the cycle routes should continue or be removed in favour of shared unsegregated routes. One of the recommendations was the desegregation of both routes along their entire lengths<sup>16</sup>.

### *Guidance*

3.3 Design principles for cycle tracks have evolved in the last few years. The primary and most up-to-date source documents for cycle facility design are now<sup>17</sup>:

- Local Transport Note (LTN) 1/12 : *Shared Use Routes for Pedestrians and Cyclists* (DfT, September 2012)<sup>18</sup>; and
- Draft *London Cycle Design Guidance* (LCDS) (Mayor of London & TfL, June 2014)<sup>19</sup>.

In addition, in April 2014, Sustrans published its latest national design manual *Handbook for cycle-friendly design*<sup>20</sup>. This is also used extensively for design guidance.

3.4 Relevant extracts from the guidance are set out below<sup>21</sup>.

#### DfT LTN 1/12<sup>22</sup> (para 7.6)

*'Previously, it has been considered good practice to segregate shared use routes wherever practicable. This approach appears to have been based on a presumption that there is considerable potential for conflict between pedestrians and cyclists on unsegregated routes. However designers are increasingly being encouraged to take decisions appropriate to the scheme context rather than adopting certain features as a starting position in the design development process.'*

This guidance supports the Council's desegregation strategy in relation to cycle routes on the Commons.

#### DfT LTN 1/12 (para 7.8)

*'Research carried out to inform this LTN - Shared Use Operational Review (Atkins, 2012) - also considered the potential for conflict and compared a number of unsegregated routes segregated by white line. No near misses or collisions were observed. The highest level of interaction observed was marginal conflict, i.e. unplanned interaction where cyclists or pedestrians slowed down or changed direction, but where movement was calm and controlled. It concluded from the observations that there was no evidence to suggest that segregation by white line materially reduces the potential for conflict.'*

This guidance demonstrates that conflicts on unsegregated routes are more perceived than actual.

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<sup>16</sup> WBC/1 para 2.11; CDs 16 & 17

<sup>17</sup> WBC/1 para 3.1

<sup>18</sup> CD3

<sup>19</sup> CD1

<sup>20</sup> CD2

<sup>21</sup> WBC/1 para 3.3

<sup>22</sup> CD3

Draft TfL LCDS<sup>23</sup> (para 5.5.10)

*'Pedestrian-dominated areas should look different from the carriageway or dedicated cycle infrastructure, to encourage cyclists to behave in a way that minimises conflict.'*

This advice shows that by desegregation and removal of the central tactile line the paths would look less like a cyclist's 'super highway' and more like a pedestrian path, and so be likely to encourage lower speeds and more courteous cycling thus reducing the chances of conflict. This is borne out by the video, shown by Mr Clyne as part of his evidence, of conditions on Chestnut Walk, Tooting Common on a busy summer day before the path there was segregated.

Draft LCDS (para 5.6.15 - Degrees of separation)

*'While separating pedestrians and cyclists is desirable in most cases, this is not an order of preference. Circumstances often dictate that sharing is a better option than partial forms of separation, particularly where flows are low.'*

The Mayer Brown surveys show that recorded pedestrian and cycle flows are classified as either low or medium on the Commons<sup>24</sup>.

Draft LCDS (para 5.6.20 - Partial separation of users)

*'Space will tend to dictate whether separating users is feasible. For low flows of both pedestrians and cyclists, at least 3m width should be available, which allows for 1.5m for each user. For high flows 3m [for each] is desirable - so, for high flows of both users, 6m would be required. If sufficient width is not available, shared use may be a better option.'*

The existing total path width on both Commons is 3m; this demonstrates that unsegregated use is preferable on the Commons due to width constraints.

Sustrans - Handbook for cycle-friendly design<sup>25</sup>

*'In Sustrans' experience there are significant advantages with unsegregated paths where the width is shared by all users, particularly on traffic free routes away from the road. Unsegregated routes maximise usable width and minimise maintenance requirements and sign/line clutter.'*

This guidance supports the Council's desegregation strategy in relation to cycle routes on the Commons.

- 3.5 The proposed removal of the tactile white line would greatly improve the visual impact of the cycle routes across both Commons. This issue was raised at the 2001 Public Inquiry as many objectors considered the tactile line to be unreasonably intrusive. Furthermore, many cyclists have complained that the tactile line can become slippery when wet. Desegregation of the cycle routes would also result in a significant reduced maintenance requirement as both the tactile white line and the

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<sup>23</sup> CD1

<sup>24</sup> CD16, figures on p.14 and Appendix A; CD17, figures on p.12 and Appendix C

<sup>25</sup> CD2, p.24 under the heading *Traffic free routes 3 - Segregation of cyclists and pedestrians*

cycle/pedestrian symbols along each section of the route to inform and remind users of the routes would not be required<sup>26</sup>.

*Response to objections*

- 3.6 The objections are unsubstantiated and largely relate to matters considered and dismissed at previous Inquiries and through confirmation of the existing Orders.
- 3.7 The routes follow the desire line(s) of cyclists. While Chestnut Walk is popular with pedestrians, there is no practical alternative. It is acknowledged that the ideal solution would be the creation of entirely separate paths for cyclists over both Commons, as some have suggested. However, this is not practicable due to the legal issues and disproportionate costs involved with appropriating common land for such use, and would itself be likely to face strong opposition. The latest guidance from the DfT, TfL and Sustrans all points to unsegregated use in this situation<sup>27</sup>.
- 3.8 Similarly, while unpublished draft TfL/Sustrans guidance<sup>28</sup> recommends a 4.5m path width for unsegregated shared use paths, the 3m width available along the existing paths does comply with the desirable minimum. Again, space constraints make widening impracticable<sup>29</sup>.
- 3.9 Contrary to assertions that the cycle routes are not enforced, the Metropolitan Police patrol and enforce them under contract with the Council<sup>30</sup>.
- 3.10 While the current Wandsworth Cycling Strategy<sup>31</sup> does seek segregated cycle tracks where possible, it acknowledges that shared use may be considered where there are space constraints. In any event, the strategy is being updated in line with current and emerging design practice as outlined above<sup>32</sup>.
- 3.11 Contrary to the claim by one objector<sup>33</sup>, Sustrans supports the desegregation strategy on the Commons, both in principle in its Handbook<sup>34</sup> as indicated above and specifically through its statements of support for these Orders<sup>35</sup>.
- 3.12 Current DfT, TfL and Sustrans design guidance does not highlight particular safety problems in practice for hearing-impaired, visually-impaired or disabled pedestrians using shared unsegregated facilities. There is evidence that cyclists ride faster on segregated paths (many of them in excess of the 12mph speed limit set by bye-laws covering Greater London

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<sup>26</sup> WBC/1 paras 4.1 & 4.2

<sup>27</sup> WBC/1 section 5.1.3

<sup>28</sup> CD4 - draft *London Cycling Design Standards*, appx 4 (Off-highway design guidance), fig.D.4 p.11

<sup>29</sup> WBC/1 section 5.1.3 and oral evidence

<sup>30</sup> WBC/1 section 5.1.3 & para 5.3.1 and oral evidence

<sup>31</sup> CD7

<sup>32</sup> WBC/1 section 5.2 item 1

<sup>33</sup> OBJ/3

<sup>34</sup> CD2

<sup>35</sup> SUP/1; SUP/1.1; WBC/1 section 5.2 item 2

Parks<sup>36</sup>). The expectation is that speeds would be lower on unsegregated paths<sup>37</sup>.

3.13 *Manual for Streets*, cited by an objector with regard to segregation and path widths, is not normally used as a source of guidance for cycle facility design in situations such as this. DfT, TfL and Sustrans guidance as above is more directly relevant<sup>38</sup>.

3.14 It is clear from the case put at the Inquiry for the Open Spaces Society that it seeks removal of cyclists from the Commons and wider paths. However, the Society accepted that the present situation is unsustainable. On that basis its position should be given little weight.

#### *Support*

3.15 The proposals provided for in the Orders have the support of the majority of those who have made representations. The scope of the support is wide-ranging and includes both the Wandsworth and Tooting Commons Management Advisory Committees (MACs), Sustrans, the Friends of Tooting Common, Wandsworth Cycling Campaign, the Metropolitan Police and users of the paths and cycle tracks as pedestrians and/or cyclists. The Wandsworth Access Group/Organisation raised no objection to the proposals<sup>39</sup>.

3.16 Tooting MAC told the Inquiry that it is important the culture of the Commons is recognised and the issue is how best to share the width available. It is aware of the anecdotal evidence that separation has caused specific problems because no one knows what the lines are there for, and suggested that it fails to work because it is complicated. The white line causes cyclists to act in a proprietorial and aggressive manner, and precludes use of the existing paths by disabled cyclists. Furthermore people are also randomly crossing the path which is dangerous when cyclists are cycling too fast<sup>40</sup>.

3.17 The evidence is that most users are using both sides of the path already. Tooting MAC has concluded that desegregation would result in improvement, with cyclists riding more carefully if there were no white line. The Wandsworth Society and many local residents supported this view. Local residents sum up the position thus:

- *'I have regularly been shouted at myself for straying over the white lines';*
- *'There is not a shadow of a doubt to anyone used to using the common that cycling lanes made it more, not less dangerous, particularly to small children.'*
- *'Unfortunately giving the cyclist a lane has made them feel that they have the right to cycle stupidly fast and give way to nobody';* and

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<sup>36</sup> CD8

<sup>37</sup> WBC/1 section 5.2 items 3 & 5-7; *ibid* para 5.3.1

<sup>38</sup> WBC/1 section 5.2 item 4

<sup>39</sup> WBC/1 para 6.3

<sup>40</sup> Oral submissions

- *'I am hoping that the white lines will be removed ... we are always very intimidated by the speed of some of the cyclists'.<sup>41</sup>*

### *Conclusions*

- 3.18 On balance the advantages of desegregation very much outweigh the disadvantages. The Secretary of State is asked to confirm the Orders.

## **4. THE CASES FOR THE SUPPORTERS<sup>42</sup>**

*The material points are:*

### **Sustrans<sup>43</sup>**

- 4.1 The proposal to convert the Wandsworth Common cycle track (which forms part of the *Avenue Verte* route from London to Paris and is a popular resource for cyclists) to an unsegregated path is welcomed. Sustrans has found that segregated routes can lead to higher cycling speeds, territorial behaviour by both pedestrians and cyclists, conflict between users and higher levels of non-compliance especially where people walk in groups. Unsegregated 'shared use' paths by contrast can encourage more responsible behaviour and slower cycling speeds, which is key in such popular locations, may be cheaper to construct and maintain and require fewer signs and markings.
- 4.2 For unsegregated routes the guidance points to a preferred minimum width of 3m. For segregated routes paths need to be wider – a preferred minimum of 7m (2 x 3.5m), with an acceptable minimum of 4.5m and an absolute minimum of 3.5m but only over short lengths and with substantial levels of non-compliance expected.

### **Tooting Commons MAC<sup>44</sup>**

- 4.3 The MAC broadly agrees with the principle of the Tooting Common Order. There are many pedestrians and cyclists sharing the same space and, while many cyclists enjoy a quiet route across the Common and act considerably towards other users, there is evidence that segregation engenders feelings of propriety in a small but significant minority of them, which is a problem for many other users.
- 4.4 It is not a question of being pro- or anti-cycling on the Common, and removal of the cycle track is not being sought or proposed as some people seem to think. However the options are limited. They are to stick with the present situation, which evidence shows to be unsatisfactory in many respects; to dig up the Common to make a separate cycle track, which the MAC does not support; or to secure a design that engenders good social behaviour. The proposed unsegregated, shared use design would encourage everyone to negotiate. Counter-intuitively it would be better and safer than the existing situation, and there are many examples of

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<sup>41</sup> Oral submissions

<sup>42</sup> Those who made representations during the statutory period for objections.

<sup>43</sup> Written representations - SUP/1 (Wandsworth Common Order) & SUP/1.1 (both Orders)

<sup>44</sup> SUP/2; SUP/2.1 & oral evidence/submissions re Tooting Common Order (The MAC also made further detailed points regarding surfacing and signage, but these are outside the ambit of the Order).

shared paths working well, for example along the Thames. The MAC favours the last option.

## **5. THE CASES FOR THE OBJECTORS<sup>45</sup>**

*The material points are:*

### **Tania Shishkin<sup>46</sup>**

- 5.1 Neither option (segregated or unsegregated) is ideal, but segregation has definitely brought improvements. The majority of pedestrians keep to the pedestrian path and there are fewer accidents this way. If there are complaints about the speed or aggression of cyclists, not having cycle paths would not help. The roads are dangerous and it is pleasant to cycle through the park.

### **Open Spaces Society<sup>47</sup>**

- 5.2 The issue lies in the unsuitability of the path, especially in Chestnut Walk, for joint use by cyclists and pedestrians, irrespective of whether or not the path is segregated. Confining the many pedestrians who use this stretch at busy times to a 1.5m strip is ludicrous and impractical.
- 5.3 The operational review conducted for the Council following complaints soon after the route became operational recommended as its 'preferred approach for the long-term' a new, separate facility for cyclists across Tooting Bec Common.
- 5.4 What is now being proposed was put to Wandsworth Councillors as being in line with the new draft TfL/Sustrans guidance on joint use paths<sup>48</sup>, but it is not. For unsegregated shared use paths the draft guidance recommends a width of 4.5m for unbounded paths and 5.0-5.2m for a bounded path. The Tooting Common route, which is bounded in parts, is 3m wide - the 'desirable minimum' in the guidance. This allows for 2 cyclists to pass comfortably or for a cyclist and 2 pedestrians to pass, but is totally inadequate for the very heavy flows at certain places and times. The width falls woefully short of the most basic recommendation.
- 5.5 Of particular concern in this respect is Chestnut Walk, where various facilities and the sheltered promenade are strong attractions<sup>49</sup>. In the real world, as illustrated by the video recordings of users of the Walk before it was segregated, pedestrians tend to walk erratically along and across the path in such situations. The path is not just a thoroughfare, it is a playground. The guidance upon which the Council relies does not reflect the complex nature of real world usage.

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<sup>45</sup> Those who made representations during the statutory period for objections.

<sup>46</sup> OBJ/1 (written representation re Tooting Common Order)

<sup>47</sup> OBJ/2; OBJ/2.1 & oral evidence/submissions re Tooting Common Order. (The Society's procedural concerns are reported in section 1 of this Report.)

<sup>48</sup> CD4, table D.4

<sup>49</sup> OBJ/2.1 photos at appx JC1

- 5.6 Moreover, contrary to assurances given to Councillors that the guidance was unlikely to change significantly, TfL has advised<sup>50</sup> that it is likely to change significantly in the final published version.
- 5.7 Chestnut Walk is more than just a footpath and should be treated as such. Removal of the white line would be no more than a stop-gap solution to an increasingly unsustainable situation. And it is likely to become more so as a strategy recently submitted to the Council includes creation of a Waterloo-Croydon route passing through the Commons<sup>51</sup>. There is no evidence that the Council has had regard to increasing usage in promoting these Orders.
- 5.8 The Council has no proposals to manage cycling speeds, and neither it nor the Police have the resources to provide effective monitoring and control. In the current economic climate it would be unrealistic to rely on policing to address problems on the paths.
- 5.9 Neither the existing segregated track nor the proposed desegregated one is a sustainable solution. A separate facility is required.

### **Simon Shields<sup>52</sup>**

- 5.10 Guidance and policy make it clear that unsegregated paths are not suitable for busy, urban areas like Wandsworth. The policy in the Council's own *Wandsworth Cycling Strategy 2011-2016* has been ignored. This states that cycle tracks will be segregated where possible, with shared use being considered only with regard to the suitability of the space for both pedestrians and cyclists and with utmost regard to the convenience and safety of pedestrians<sup>53</sup>.
- 5.11 It is incorrect to say that Sustrans supports unsegregated paths; its guidance in *Traffic Free Paths*<sup>54</sup> states that raised white line delineators can be used to segregate users in busier areas. *Manual for Streets* recommends physical separation of cycle tracks from footways/footpaths where there is sufficient space.
- 5.12 DfT report *Inclusive Mobility*<sup>55</sup> recommends physical segregation where a cycle track runs alongside a footway or a footpath or, where this is not possible, separation by a tactile line. DfT guidance LTN 2/04 makes it clear that paths should be segregated if there are high flows of users or high use by disabled people or the width is sufficient. All three criteria are met here, which is why the tracks were segregated.
- 5.13 There is a secondary school for deaf children, the only one in London, and adult education centre for deaf people in close proximity to Wandsworth Common. A number of the pupils have Usher Syndrome, which causes both deafness and sight impairment. The UK's largest retirement home is also located close to Wandsworth Common. The proposed changes would have a

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<sup>50</sup> Supporting evidence not submitted

<sup>51</sup> OBJ/2.1 appx JC7 para 22.1

<sup>52</sup> OBJ/3; OBJ/3.1 (re both Orders)

<sup>53</sup> CD7 & appx to OBJ/3.1, policy LIP49

<sup>54</sup> Not submitted

<sup>55</sup> Undated; not submitted

- disproportionate impact on people with sensory and mobility impairments, and many older and disabled residents.
- 5.14 Research by the Royal National Institute for the Blind (RNIB)<sup>56</sup> points to the dangers of unsegregated paths for blind and partially-sighted people. This and research for the Guide Dogs for the Blind Association disproves the claim in the Mayer Brown review for the Council that the risks to partially-sighted/blind people is no greater on unsegregated paths than on segregated ones<sup>57</sup>.
- 5.15 The fear of being struck by cyclists is a significant concern for many disabled people. They are often less able to see cyclists approaching, especially from behind, and less able to take any necessary avoiding action quickly than other pedestrians. Many now avoid the Commons altogether as a result of this. There is no apparent evidence of access officers and groups representing blind or deaf people being involved in the process for this scheme.
- 5.16 Since the Mayer Brown review was undertaken, the volume of cyclists using the Commons has increased significantly and it is almost certain to increase further. The report states that unsegregated paths cause cyclists to travel more slowly, but did not cite any evidence for this. It also called for the paths to be widened but noted that this would lead to increased cycle speeds, without explaining the apparent contradiction.
- 5.17 95% of users of the paths, when asked, oppose the proposed desegregation, and many disabled people would be forced out of the Commons if it were introduced.

## **6. OTHER REPRESENTATIONS<sup>58</sup>**

### **Broadly in support of the Orders**

- 6.1 Cycle lanes have made the Commons more, not less, dangerous.
- 6.2 A segregated path gives cyclists, particularly commuters, a mistaken sense of ownership and exclusivity. They seem to be unaware that they must still give way to pedestrians. This leads to speeding, aggression, friction between cyclists and pedestrians, and antisocial behaviour. The paths across the Commons are not roads/thoroughfares, and should not be used as such.
- 6.3 The existing path is too narrow for segregated use. Removal of street furniture encourages people to be more considerate and improves safety. Similarly, desegregation would not remove the right of cyclists to use the paths, but would require all users to share them and to be aware of and considerate towards other users as they were before the paths were segregated.

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<sup>56</sup> Not submitted

<sup>57</sup> OBJ/3 points 3 & 6

<sup>58</sup> Inspector's notes: Based on written representations (REP/1-51) and oral evidence/submissions at the Inquiry. In view of the number of representations, many making similar points, I report them by topic to avoid repetition and do not attribute them individually. Due to the variety of sources, they are not necessarily consistent with each other. I do not report on matters that are outside the ambit of the Orders. I differentiate between the Orders only where points made are clearly relevant to only one of them.

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- 6.4 The current situation causes confusion for users. Young children and dogs do not recognise the markings or their significance, which causes danger to them and to cyclists. Visually impaired people cannot tell which side of the white line is for pedestrians and which for cyclists. There are many near misses involving not just young children and dogs but also adults using the Commons for their intended purpose – enjoyment. It is only a matter of time before there is a serious accident. Cyclists should not expect dogs being exercised and children playing on the Commons to be kept as closely controlled as they would be on a busy street.
  - 6.5 Given the limited width of the path, segregation leaves inadequate space for users in wheelchairs or with pushchairs, causing other pedestrians to cross into the paths of cyclists.
  - 6.6 On the segregated path, pedestrians have to walk in single file which is unsociable.
  - 6.7 Segregations and the white lines give a dangerous false sense of security to cyclists. There may not be many reported accidents but there is much anecdotal evidence of near misses and a perceived sense of danger to pedestrians on the paths.
  - 6.8 The raised white lines themselves are dangerous. They are a trip hazard and, when newly-installed, were particularly slippery; this contributed to several falls and injuries.
  - 6.9 The white lines are unsightly and detract from the informal open land ambience of the Commons.
  - 6.10 Most paths on Clapham Common are desegregated. There the mixing of cyclists and pedestrians is safe, effective and does not cause significant problems for either group.
  - 6.11 The balance between landscape/biodiversity and recreational use is best struck by desegregating the paths.
  - 6.12 Policies change as we learn more. Since the existing Orders were drawn up Sustrans and DfT have moved away from segregation; it is no longer the default. Desegregation is in line with contemporary guidance which shows that it leads to better behaviour and so is safer. It also enables de-cluttering through removal of signs and surface markings.
  - 6.13 The paths were intended to be shared between all users of the Commons. Whereas separate cycle lanes on roads are there to protect cyclists from traffic, on the Commons safety would be improved by their absence. The white lines should be removed, and appropriate signage be installed to make it clear that the paths were for shared use but pedestrians have priority.
  - 6.14 At present there is a widely-held misconception about the paths. Pedestrians may use the whole width of the path, but cyclists are confined to the 1.5m cycle track. Desegregation would make the arrangement clearer.
  - 6.15 The costs involved in removing the lines would be less than those for widening of the paths to conform to standards for segregated use.
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- 6.16 The Council's consultation process was transparent and fair to all who participated. The decision was soundly-based and reflected relevant guidance and officers' recommendations.
- 6.17 The views of local users of the Commons should not be subordinated to the interests of the wider community of cyclists who value the Commons only as a safe through-route.
- 6.18 People signing the petition opposing the Orders<sup>59</sup> were concerned that the Council was proposing to stop cycling along these routes. It would be wrong to divert cyclists off the Commons; nobody would want this.

### **Broadly opposing the Orders**

- 6.19 Walking is being encouraged by the Government for exercise and pleasure (many people jog for these reasons too) and for trips such as to school. People require space where they can do this unhindered, safely and without fear.
- 6.20 Children and dogs move erratically, they do not read signs or respond to bells. They should be able to run freely and safely on the Commons.
- 6.21 Cycling lanes are useful in countering the view of many dog walkers that the Commons are intended only for them.
- 6.22 The Commons are very well used at weekends, especially around Chestnut Walk. It would be dangerous for all users to get around without some sort of path for cyclists, especially for children learning to ride bikes. They may be forced to use the grass or even to go around the Commons on the road, which would be dangerous.
- 6.23 The number of cyclists using the routes through the Commons has increased significantly in recent years and seems likely to increase further, especially if they become parts of strategic routes.
- 6.24 On footpaths pedestrians 'negotiate' with each other to avoid collisions. Cyclists on the other hand challenge pedestrians for space, changing direction only minimally and passing very close at speed, especially from behind, and showing no regard for the safety of pedestrians and themselves. They assume a moral right to ride fast regardless of anyone else, act aggressively towards anyone in their way and are abusive when challenged. This is frightening, particularly for the young, old and people with disabilities.
- 6.25 Most cyclists understand the reason for the lines and are considerate and travel at reasonable speed on the Commons.
- 6.26 Segregation has benefitted pedestrians and cyclists alike. It informs each group where it is safest to be, and most users adhere to it. The paths should remain as they are, or the cycling and pedestrian parts of the paths should be differentiated by colour or surfacing.
- 6.27 Removal of the lines would lead to confusion amongst users and an increase in 'incidents' between pedestrians and cyclists. It might be the first step to banning all cycling on the Commons.

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<sup>59</sup> OBJ/3

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- 6.28 Removing segregation would reinforce the message that it is socially acceptable to cycle on footways and in pedestrian areas.
- 6.29 It would be better to keep cyclists off the Commons altogether.
- 6.30 Segregated paths are the only safe and practical solution when cyclists and pedestrians, including those who are young, old, less able or sight-challenged, use paths in close proximity.
- 6.31 The existing rules regarding cycling on the Commons and to protect legitimate users are not being enforced.
- 6.32 Cycle tracks are very helpful for children travelling to school and for leisure.
- 6.33 Cyclists should be prohibited from using the Commons.
- 6.34 If cyclists are to continue to be allowed to ride on the paths, then keeping the segregation/white lines is the lesser of two evils. Having no clear right of way would be a recipe for accidents.
- 6.35 Before any decision is made to desegregate the paths, the existing regulations must be enforced rigorously and cyclists forced to ride considerately. Only then can a judgement be made on whether sharing paths is appropriate, an entirely separate route should be created or cycling on the Commons should be banned.
- 6.36 The London Mayor's *Cycling Strategy*, DfT's *Inclusive Mobility*, the RNIB's *Put Pedestrians First* and the Council's *Wandsworth Cycling Strategy* all agree that shared paths should be segregated where possible.
- 6.37 A survey of pedestrians and cyclists using the path, appended to a report to the Council on the proposals<sup>60</sup>, clearly shows general satisfaction with the present arrangement.

*The Report continues on the next page*

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<sup>60</sup> CD18 appx C

## 7. CONCLUSIONS<sup>61</sup>

### Introduction

- 7.1 The scope of my conclusions and recommendations is necessarily limited. The Cycle Tracks Act 1984 provides<sup>62</sup> that the Secretary of State may confirm the Orders as made or with modifications, and it follows that alternatively he may not confirm them. The extent to which an Order may be modified is for the Secretary of State to decide. However, in the interests of fairness substantial changes, particularly where new or extended provisions are involved, normally require publication of a new Order by the promoter.
- 7.2 If the Orders that are the subject of this Report are confirmed, their provisions will come into effect, replacing the existing Orders. If they are not confirmed, the existing Orders will continue to have effect unless subsequently revoked by further Order(s).
- 7.3 Either way, it would remain open to the Council to bring forward further Orders regarding the arrangements for cycling on the Commons, subject of course to the statutory procedures. Matters such as preclusion of cycling on the Commons, provision of new cycle tracks along new routes or widening of the paths, as some have suggested (but which others oppose and neither is currently proposed by the Council), might be brought forward in this way [3.7, 3.14, 4.4, 5.4, 5.9, 6.18, 6.29, 6.35]. The Council could also or alternatively make physical changes such as to signing, surface markings and surfacing, again as suggested or change the enforcement regime [4.1, 6.12, 6.13, 6.26].
- 7.4 While this is a matter of law, it is my understanding that it would not be open to the Secretary of State in his decisions on the Orders now under consideration to require or proscribe any such measures, irrespective of their merits. Therefore I shall make no recommendations on their merits.

### Guidance

- 7.5 The guidance relevant to cycle tracks has evolved since the previous Orders were under consideration, and I have considered the present Order proposals in the light of current guidance [3.3, 6.12]. It seems to be undisputed that the following are relevant and up-to-date:
- Local Transport Note (LTN) 1/12 : *Shared Use Routes for Pedestrians and Cyclists* (DfT, September 2012); and
  - Sustrans Design Manual : *Handbook for cycle-friendly design* (Sustrans April 2014) [3.3].
- They are informed by observations and experience of the operation of unsegregated paths away from the road [3.4]. I consider that these documents should be given considerable weight.
- 7.6 The *London Cycling Design Standards* (LCDS) were published in draft for consultation by the Mayor of London and DfT in June 2014 [3.3]. At the time of the Inquiry the outcome of the consultation process was not known. One objector states that the DfT has advised that the guidance is likely to change

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<sup>61</sup> References thus: [1.1] are to previous paragraphs in this Report.

<sup>62</sup> Section 3(3)(a)

significantly in the final version, though no evidence to support this assertion was submitted [5.6]. In any event, it is not known whether the particular elements relevant to the decisions on these Orders will change or, if so, in what way. I consider that the draft LCDS carries some weight but not the full weight of a final published document.

- 7.7 Most other guidance cited in representations variously predates the above national and London guidance; is directly superseded by it, and/or is referred to but has not been submitted [5.4, 5.11, 5.12, 5.14, 6.36]. Additionally *Manual for Streets*, as the title suggests, focuses on streets rather than paths away from them, and policy LIP49 in the Wandsworth Cycling Strategy 2011 to 2016 relates expressly to cycle facilities on or adjacent to carriageways [3.13, 5.10, 5.11, 6.36]. The Council advises that its Cycling Strategy is being updated in line with emerging design practice [3.10]. For these reasons I consider that little weight should be given to such guidance.
- 7.8 While it might have been the case that when the previous Orders were prepared the guidance generally favoured segregated paths, current guidance, in the light of experience and further assessment, points more towards unsegregated paths, especially on traffic-free routes away from roads as here [3.4].

## Assessment

- 7.9 In essence the alternatives at issue in the consideration of these Orders are limited to whether the existing paths should remain segregated or become unsegregated. It seems to be widely, though not universally, agreed that neither is ideal. But, for the reasons indicated above, wider measures such as creation of separate cycle tracks, widening of the paths or prohibiting cycling on the paths, irrespective of their merits, are outside the ambit of the Orders.
- 7.10 LTN 1/12 sets out (para 4.2) the core design principles for shared use routes: convenience, accessibility, safety, comfort and attractiveness. It recognises, however that there can be tensions between these so that addressing one might have a negative impact on others.
- 7.11 It is evident from the representations that there are differences between the perspectives and interests of cyclists and pedestrians of all kinds who use these paths, and that these sometimes bring the two into conflict [3.16, 3.17, 4.1, 4.3, 5.1, 5.10, 5.13, 5.14, 5.15, 6.1-6.7, 6.19, 6.24]. It is unlikely that it would be possible to remove completely the potential for such conflict within the limitations of the paths here, but there is little dispute that it is necessary to minimise them. Not surprisingly, those supporting and opposing the Orders disagree on whether segregated or desegregated paths would best achieve this [4.4, 5.17, 6.1-6.37].
- 7.12 The paths here have been segregated for 8 years or so, and that provides ample evidence of their operation as such. Those making representations describe this and I made my own observations at both peak commuting times, including when children were on their way to school, and off-peak. I also have wide experience of similar paths elsewhere, both as a pedestrian (including with children and dogs) and as a cyclist.
- 7.13 It is clear that some cyclists, particularly but not confined to commuters as I saw, regard the cycle track as a thoroughfare (or 'super highway' as the

Council described it [3.4]) where they can ride at speed. A minority aggressively assert what they regard as their 'right of way' over pedestrians, while some others do not make sufficient allowance for pedestrians who, for whatever reason, 'stray' onto the cycle track.

- 7.14 Pedestrians, on the other hand, do not always simply walk along the paths in straight lines. Some meander within and beyond the paths; in family or social groups they walk side-by side, sometimes deep in conversation and not fully aware of their surroundings; joggers often listen to music through headphones or earpieces. Pedestrians are often unaware of approaching cyclists, especially from the rear, and may be startled by audible warnings and/or perceive them as aggressive. Children and dogs running free treat the paths as just another part of the Common space. Long dog leads may span the cycle track. Some people seem wilfully to ignore the segregation; others, particularly children and those with visual impairment, might not perceive the distinction between the two sides of the paths. Some with physical disabilities, using wheelchairs or pushing large buggies may be forced to use the cycle track to pass others going the opposite way.
- 7.15 Many of these behaviours apply equally to unsegregated paths, but many supporting the Orders suggest that in the absence of a separately-identified cycle track the sense of entitlement amongst cyclists is reduced and they are thus encouraged to 'negotiate' on more level terms with pedestrians [4.4, 6.1-6.18]. This view is supported by research carried out for DfT to inform LTN 1/12, in which a number of routes were studied [3.4], by observations of paths on Clapham Common and along the Thames by supporters of the Orders [4.4, 6.10] and by my own experience of off-road unsegregated paths in similar situations.
- 7.16 To my mind it is also supported by video recordings shown at the Inquiry by the Open Spaces Society<sup>63</sup> [5.5]. This purported to illustrate the dangerous and unsatisfactory conditions that arise from such an arrangement, but it seems to me that it actually showed pedestrians and cyclists successfully 'negotiating' use of the path, with the latter occasionally taking avoiding action when potential hazards, such as a child or dog running across the path occurred. There were no collisions or undue aggression on the part of cyclists, and I do not find the Society's suggestion that they were on their best behaviour because of the presence of the camera entirely credible. I recognise that the recordings were made on a busy summer day, apparently at a weekend, when the pace of life is slower than at peak commuting times [3.4]. However, at the latter times the level and nature of use by pedestrians is also likely to be different.
- 7.17 It is important to take a proportionate approach to the question of conflicts. The study informing LTN 1/12 reported that: '*The highest level of interaction observed was marginal conflict, i.e. unplanned interaction where cyclists or pedestrians slowed down or changed direction, but where movement was calm and controlled.*' [3.4]. That largely accords with my own observations and the interactions indicated in the video.
- 7.18 A number of those making representations express the view that sharing of the paths, whether they be segregated or unsegregated is dangerous.

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<sup>63</sup> The recordings themselves were not submitted.

However here, as the DfT study found elsewhere, the almost complete lack of recorded accidents indicates that the danger is more perceived than real [3.4, 5.14, 6.1, 6.7, 6.8]. That is not to say that conflicts between pedestrians and cyclists do not have adverse impacts. It is clear that they detract from some people's enjoyment of the Commons generally and the paths in particular, to the extent that some avoid them [5.15, 6.19, 6.20, 6.22].

- 7.19 While some consider that segregation is the safer of the two options [5.1, 6.7, 6.26, 6.30], it seems to me that this assumes that cyclists and pedestrians each keep to their 'own sides' of the path and there are no conflicts. In my view that is unrealistic in practice, and the research informing LTN 1/12 found no evidence that segregation materially reduces the potential for conflict [3.4]. Others express the view that desegregation is safer as it requires cyclists to slow down and 'negotiate', thereby reducing conflicts [4.1, 4.4, 6.2, 6.3, 6.10, 6.12, 6.13]. To my mind that is intuitively the case, though no empirical evidence to support it has been submitted.
- 7.20 As the Council points out, current guidance does not highlight particular safety problems in practice for hearing-impaired, visually-impaired or disabled pedestrians using shared unsegregated facilities [3.12]. It seems to me that reduction of conflicts would be of particular benefit to such users.
- 7.21 Desegregation would enable removal of the white line and other surface markings. It seems to be undisputed that the raised line itself poses a hazard, though I have seen no evidence of actual accidents arising from this, but in any event I share the view that the markings detract from the character and appearance of the Commons. The Council indicates that there would also be a net financial saving in that it would no longer have to maintain the line; this too is undisputed, though the scale of the saving is questioned [3.5, 6.8, 6.9, 6.13].
- 7.22 Contrary to the suggestion by one objector, the widths of the paths accord with the 'desirable minimum' width for unbounded unsegregated shared use paths recommended by Sustrans [4.2, 5.4]. I accept that they fall short of the recommended width for such paths and below the 'desirable minimum' and 'recommended' widths for segregated paths in the draft LCDS and an unpublished appendix (dated August 2010) thereto [3.4, 3.8]. However, the Orders do not provide for widening of the paths and, contrary to the suggestion by one objector, there would no additional cost in this respect [6.15].
- 7.23 This does nevertheless add weight to the view that, given the width constraints here, desegregation is the preferred option. Moreover, the likelihood of widening being subsequently proposed, especially where flows are highest, would be greater if the paths were to remain segregated than if they were unsegregated as now proposed.
- 7.24 An objector suggests that the Council is incorrect in saying that Sustrans does not support unsegregated routes. However, as the authority points out, Sustrans does support such routes in its handbook and, more specifically, expressly supports the Orders [3.11, 4.1, 5.11].

### **Overall conclusion**

- 7.25 It seems to be widely accepted that neither the existing situation nor the proposed segregation of the paths is ideal, but the scope of the proposed

Orders is clearly defined. My conclusions have been restricted to the matters that they cover. In the event that any further measures were brought forward in the future they would fall to be considered separately through the relevant procedures.

- 7.26 The guidance on shared paths has moved on since the existing segregated arrangement was formulated and put into effect. The relevant current guidance, in the light of practical experience with different kinds of shared facility and studies of their operation, now advises designs appropriate to their context but points to unsegregated paths in a situation such as this.
- 7.27 While concerns about the effect of desegregation on users are understandable, such evidence as there is suggests that they are largely unfounded. There might be a slight adverse effect on the convenience of cyclists through encouraging them to slow down, but this would make the paths and the adjacent parts of the Commons more accessible, comfortable and attractive to pedestrians, including those with mobility, visual or hearing difficulties, as would the likely reduction in conflicts between cyclists and pedestrians. There is no evidence that safety would be adversely affected; on the contrary there is the potential for improvements in safety for the same reason. Removal of the white lines and the potential for reduction and rationalisation of signage would further enhance the attractiveness of the Commons.
- 7.28 Accordingly, in terms of the core design principles for shared use routes set out in LTN 1/12, the balance is in favour of desegregation of the paths through the Commons as provided for in the Orders.

### **Modifications to the Orders**

- 7.29 No modifications to either Order have been put forward, and I have seen or heard nothing to lead me to recommend any.

### **8. RECOMMENDATIONS**

- 8.1 I RECOMMEND that the London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2013 be confirmed without modification.
- 8.2 I RECOMMEND that the London Borough of Wandsworth (Tooting Bec and Tooting Graveney Common) Cycle Tracks Order 2013 be confirmed without modification.

*Alan Boyland*

Inspector



## APPENDIX B

### DOCUMENTS

#### Inspector's Dossier

DOC/1

Part 1 – Covering letter from Wandsworth Council submitting Orders to Secretary of State for confirmation

Part 2 – The London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2013 – Order, plan & notice

Part 3 – The London Borough of Wandsworth (Tooting Bec and Tooting Graveney Common) Cycle Tracks Order 2013 – Order, plan & notice

Part 4 – Council's Committee reports

Part 5 – Objections:

OBJ/1 – Tania Shishkin (TC<sup>64</sup> Order)

OBJ/2 – Open Spaces Society (TC Order)

OBJ/3 – Simon Shields (including petition with approx 561 signatures) (both Orders)

Part 6 – Council's responses to objections

Part 7 – Support:

SUP/1 – Sustrans (WC<sup>65</sup> Order)

SUP/2 – Tooting Commons Management Advisory Committee (MAC) (TC Order)

Part 8 – Additional representations after Inquiry notice<sup>66</sup>:

REP/1 – Jeremy Jessell (opposing TC Order)

REP/2 – Simon Hemsley (supporting WC Order)

REP/3 – Kate Hudson (supporting TC Order)

REP/4 – Ann Heywood (supporting both Orders)

REP/5 – Michael Langdon (opposing TC order)

REP/6 – Gail Chilton (opposing TC Order)

REP/7 – Strachan McDonald (supporting TC Order)

REP/8 – Lucia Cadei (opposing TC Order)

REP/9 – John Locker (supporting TC Order)

#### Further submissions by objectors & supporters

OBJ/2.1 Open Spaces Society (proof of evidence of Jeremy Clyne and appendices JC1-16)

OBJ/3.1 Simon Shields

<sup>64</sup> Tooting Common

<sup>65</sup> Wandsworth Common

<sup>66</sup> References to support, opposition or neutrality relate to the broad thrust of representations where the position is not explicitly stated

- SUP/1.1     Sustrans
- SUP/2.1     Tooting Commons MAC (from Richard Glassborow, Chairman, re. TC Order)

**Other representations<sup>67</sup>**

- REP/10     Jon Irwin (supporting both Orders)
- REP/11     Hil de Souza (supporting TC Order)
- REP/12     Jennifer White-Callaghan (opposing WC Order)
- REP/13     Wandsworth Common Management Advisory Committee (MAC) (supporting WC Order)
- REP/14     Annie Bland (opposing WC Order)
- REP/15     Sarah Robson (supporting WC Order)
- REP/16     Wandsworth Society (supporting WC Order)
- REP/17     Ruth Ingledow (supporting WC Order)
- REP/18     Melissa Taylor (supporting WC Order)
- REP/19     Dominic & Melanie Pearson (supporting WC Order)
- REP/20     Abigail Bryans (opposing WC Order)
- REP/21     Kate Summers (supporting WC Order)
- REP/22     James Dillon (supporting WC Order)
- REP/23     Bill Shannon (opposing WC Order)
- REP/24     Jonathan Koessler (supporting WC Order)
- REP/25     Christopher Peach (supporting both Orders)
- REP/26     Emily Gill (supporting TC Order)
- REP/27     Elizabeth Johnson (supporting WC Order)
- REP/28     Valerie Evans (supporting WC Order)
- REP/29     Tina Newnham (supporting TC Order)
- REP/30     Anne Morley-Fletcher (supporting TC Order)
- REP/31     Lewis More O'Farrell (opposing WC Order)
- REP/32     Heide Pirwitz (supporting both Orders)
- REP/33     Aviva Walton (supporting WC Order)
- REP/34     Rozzy Hyslop (supporting both Orders)
- REP/35     Paul Fox (opposing WC Order)
- REP/36     Elke Fidler (opposing WC Order)
- REP/37     Cllr Leonie Cooper (supporting both Orders)
- REP/38     Kate Robathan (supporting both Orders)

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<sup>67</sup> References to support, opposition or neutrality relate to the broad thrust of representations where the position is not explicitly stated

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REP/39	Deborah Ballinger-Mills (oppose TC Order)
REP/40	Ben Ridgwell (supporting both Orders)
REP/41	Friends of Tooting Common (neutral)
REP/42	John Harbord-Hamond (neutral)
REP/43	Tania Fallon (opposing both Orders)
REP/44	Camilla Ridgwell (supporting both Orders)
REP/45	Kumar Varma (opposing both Orders)
REP/46	Annie Sherman (supporting WC Order)
REP/47	Beverley Green (opposing WC Order)
REP/48	Caroline Horn (supporting TC Order)
REP/49	Joel Down (supporting TC Order)
REP/50	Lucy Thacker (neutral)
REP/51	Victoria Powell (supporting WCs Order)

**Submitted by Wandsworth Borough Council**

WBC/1	Martin Hoare – proof of evidence
WBC/2	Martin Hoare – summary proof of evidence

**Core Documents**

CD1	Draft London Cycling Design Guidance (version 2) published by Transport for London in June 2014
CD2	Handbook for cycle-friendly design published by Sustrans in April 2014
CD3	Local Transport Note (LTN) 1/12 Shared Use Routes for Pedestrians and Cyclists published by the Department for Transport in September 2012
CD4	Draft 'Off-highway (Greenways) design guidance' dated 31 August 2010 commissioned by TfL/Sustrans
CD5	Extract from Manual for Streets published by the Department for Transport on 29 March 2007 (Chapter 6 - Street Users' needs)
CD6	Extract from "Inclusive Mobility" published by the Department for Transport on 15 December 2005 (Paragraphs 1 to 4.5)
CD7	Wandsworth Council – Wandsworth Cycling Strategy 2011 to 2016
CD8	Greater London Council parks, gardens and open spaces bye-laws
CD9	Department of Environment Decision Notice dated 22 July 1996
CD10	London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2000 dated 6 June 2000
CD11	London Borough of Wandsworth (Tooting Bec Common) Cycle Tracks Order 2000 dated 6 June 2000
CD12	Inspector's Report dated 25 February 2002 relating to the London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2000

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- CD13 Inspector's Report dated 25 February 2002 relating to the London Borough of Wandsworth (Tooting Bec Common) Cycle Tracks Order 2000
  - CD14 Decision Letter issued by the Government Office for London on 27 October 2005 relating to the London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2000
  - CD15 Decision Letter issued by the Government Office for London on 27 October 2005 relating to the London Borough of Wandsworth (Tooting Bec Common) Cycle Tracks Order 2000
  - CD16 Operational Review of Wandsworth Common Cycle Route — Final Report by Mayer Brown Limited dated December 2008
  - CD17 Operational Review of Tooting Bec Common Cycle Route — Final Report by Mayer Brown Limited dated December 2008
  - CD18 Report to the Strategic Planning and Transportation Overview and Scrutiny Committee on 12 November 2012 and to the Executive on 19 November 2012
  - CD19 Statement of Decisions made by the Executive on 19 November 2012
  - CD20 Report to the Strategic Planning and Transportation Overview and Scrutiny Committee on 23 April 2013 and to the Executive on 29 April 2013
  - CD21 Statement of Decisions made by the Executive on 29 April 2013
  - CD22 The London Borough of Wandsworth (Wandsworth Common) Cycle Tracks Order 2013 dated 2 July 2013
  - CD23 The London Borough of Wandsworth (Tooting Bec Common and Tooting Graveney Common) Cycle Tracks Order 2013 dated 25 June 2013 (amended version)