

APPENDIX 3

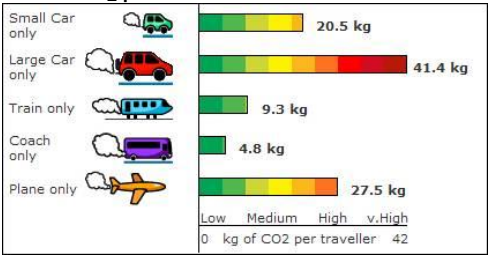
RESPONSES TO CONSULTATION ON THE DRAFT LIP

Consultee / respondent	Comment	Draft LIP Ref.	Council response	LIP changed?
Kent County Council	KCC is interested in Rail based Park and Ride at the M25 and would welcome further details on this proposal. However if the decision was taken to progress this scheme KCC would want assurances from LBB Network Rail and TfL that adequate measures would be put in place to discourage car borne trips by commuters from North West Kent who previously would have travelled by rail. If this issue was not addressed there runs the risk of increased congestion on the M25 and surrounding road network.	p44	Noted. Should Park and Ride progress, the Council would expect full discussions, with Network Rail, TfL and all affected Local Authorities to occur.	-
Tandridge District Council	It is noted that there is scope for 'growth of economic activity and skilled employment at Biggin Hill Airport', although Bromley Council 'is opposed to any growth in capacity of the Airport itself'. Tandridge District Council supports Bromley Council in being opposed to any such growth in capacity.	p14	Noted.	-
	<p>Concern is raised at the lack of a reference in the Plan to the possible cross boundary transportation implications that the Plan could have on places such as Tandridge District adjoining the London Borough of Bromley. It is considered that reference should be made in the Plan to these implications:</p> <ul style="list-style-type: none"> • The impact of any potential commuter car parking and park and ride scheme in the Biggin Hill area on roads in the District leading to and from the London Borough of Bromley. 	p44	There are no current plans for a park and ride service in Biggin Hill.	-
	<ul style="list-style-type: none"> • Biggin Hill Airport's location on the periphery of the LLB close to Kent and Surrey has repercussions cross-boundary and reference should be made to 	-	Reference to employment opportunities and road links to Tandridge are now included under <i>MTS Challenge: Support sustainable population</i>	✓

	pressures from commercial and industrial development on the Airport in terms of transport.		<i>and employment growth.</i>	
	<ul style="list-style-type: none"> The scope for joint working between the relevant authorities to provide Real Time Passenger Information on the cross boundary 464 bus service between Tatsfield and New Addington via Biggin Hill. 	-	Noted. However, real time passenger information is the responsibility of TfL and not of Bromley Council.	-
	<ul style="list-style-type: none"> It is noted that Bromley Council acknowledges 'local roads are relatively narrow'. The proximity of Tatsfield to the Airport and the inadequate rural roads in the area make Tatsfield vulnerable to increases in traffic. The Plan should require assessments of the impact of traffic arising from Biggin Hill Airport and any increase in development at the Airport on rural roads in adjoining areas of Tandridge District, in particular those in Tatsfield but also including those in Chelsham and Farleigh. 	p14	<p>Reference to employment opportunities and road links to Tandridge are now included under <i>MTS Challenge: Support sustainable population and employment growth.</i></p> <p>Any significant development affecting the Airport or adjacent sites would be subject to a full Transport Assessment</p>	✓
	The Plan should encourage an extension of the Tramlink network to Biggin Hill to improve public transport to and from the Airport, as an alternative means of travel to the car, and accordingly, it is requested that the potential for the feasibility study into extending the Tramlink network to Biggin Hill, which could benefit residents living in adjoining areas of Tandridge District, be examined.	-	Noted. However, the Council regards the Tramlink extension to Bromley Town Centre as its main priority for Tramlink extension.	-
	The Plan should seek to improve bus travel in the vicinity of Biggin Hill Airport by encouraging the use of mini shuttle buses able to transverse along rural lanes, including nearby villages in Tandridge District.	-	In general terms the Council welcomes all improvements to public transport capacity to Biggin Hill and the Airport. Detailed discussions would be needed between Tandridge and TfL to take this further.	-
London Borough of Bexley	The document has been reviewed and we do not have any comments to make regarding the draft LIP.	-	Noted.	-
London Borough of Southwark	We are particularly interested in your detailed inspection for road condition (how you go about this etc), your Police Stops programme and the Advanced Motorcycle Training courses that you run. If you are able to provide	-	Noted. Information has been provided to Southwark officers.	-

	any further information on any of these that would be greatly appreciated.			
	There do not appear to be any boundary schemes proposed, but we would be happy to be involved in any future schemes that run close to, or affect, our borough (such as improved cycle parking facilities in Crystal Palace Park).	-	Noted. The Council would undertake detailed consultation on any future schemes affecting Southwark,	-
Natural England	Natural England is pleased to see references to walking routes through Green Spaces which could have both positive and negative impacts on biodiversity. Positive impacts could be achieved through habitat creation through sympathetic planting and landscaping of new or improved routes, using Green Infrastructure policies. This is an opportunity that could be brought out more fully in the document as a whole.	p17	The Council's programme is based largely on improving existing routes through parks and other green spaces where the public is already encouraged to walk. The Council's approach is already broadly in line with the principles of Green infrastructure as described on Natural England's website.	-
	Bromley has listed eleven objectives which can be broadly supported, especially Objectives B7 and B10 which have the potential to include Green Infrastructure where appropriate to help meet the Council's objectives.	p25	Noted.	-
	Page 35 makes references to "small environmental improvements to the highway" which can relate to Objective 10, and Green Infrastructure proposals, aside from and in addition to street tree planting, which are mentioned on page 40. This can also assist the Council in promoting the conservation of the Borough's open spaces and local biodiversity, together with avoidance of fragmentation as referenced under the Strategic Environmental Assessment objectives.	p35	The reference to small environmental improvements was included in commentary on a programme of locally determined minor schemes, which has been removed from the LIP because of reductions in TfL formula funding.	-
English Heritage	MTS Challenge: Enhance the built and natural environment. This section does not identify transport opportunities for the historic environment e.g. sensitively designed public realm upgrades (Mayor's Transport Strategy, proposal 83).	p17	This section has been changed to include a specific mention of the historic environment.	✓
	Bromley's LIP Objectives English Heritage welcomes B7, however there is not an	p25	Agreed that this is not a specific transport objective, but it is fully covered by the UDP and	-

	objective in relation to 'enhancing and protecting the built and historic environment' through improvements to the public realm (Mayor's Transport Strategy, proposal 83).		will continue to be covered by the LDF.	
	Delivery Plan Heritage issues do not appear to have been considered, for example there is no mention of the fact Bromley North Station is a Listed Building (pg 30). This section does not identify transport opportunities for the historic environment e.g. sensitively designed public realm upgrades (Mayor's Transport Strategy, proposal 83).	p27	Commentary on Objective B2 now makes specific reference to the listed station building.	✓
The Association of British Drivers	Mentions that there is inadequate car parking at The PRUH and poor public transport at this site. We agree with this and welcome proposals to improve parking at this site.	p14	Noted.	-
	We support the proposal to improve parking at Orpington station. The same applies to other station car parks in the area where it is possible. Increased parking around stations inconvenience residents and can be a road safety hazard. It would be better to provide adequate parking capacity for the demand at reasonable cost.	p43	Noted.	-
	Poor orbital links are correctly identified in south London and this is not just road but rail aswell. However we are sceptical about the suggestion that Tramlink or the DLR could be extended to serve the borough. However popular trams may be with the public and councillors we all know they are a financial disaster and never pay for themselves. They are expensive to install, expensive to operate and very inflexible. Users are never willing to pay an economic price for their tickets. Only a fool would finance a new tram scheme.	p33	The Council does not agree that it is unrealistic to aim for an extension of Tramlink and DLR to Bromley within the timescale of the LIP.	-
	There is reference to 'car dependency'. There is no such thing and I have complained to the Council before	p10	The Council does not agree with this point.	-

	<p>about using derogatory terms. Car users are no more dependant on their cars than cycle users are on the bikes, yet no one refers to 'cycle dependency'. Car users use their cars because they make perfect rational choice between various transport modes. So I suggest you remove these inaccurate and biased references from your document.</p>															
	<p>Comments on CO2 emissions from cars are also biased. There is very little difference per mile emissions from the average passenger load, per passenger in the car than there is on a heavy bus or heavy rail. The fact that Bromley is a large borough which requires residents to travel greater distances is a fact of life- hence we have higher c02 emissions than other boroughs.</p>	<p>p21</p>	<p>The latest estimated average car occupancy rate figure for the UK is 1.6. Applying this occupancy rate to the CO₂ emissions for a small car of 20.5kg per100miles the smaller car would still emit 12.8 kg of CO₂; more than the bus or train in the table below.</p> <p>Figure: CO₂ per traveller over a 100 miles</p>  <table border="1"> <thead> <tr> <th>Mode</th> <th>CO₂ per traveller (kg)</th> </tr> </thead> <tbody> <tr> <td>Small Car only</td> <td>20.5</td> </tr> <tr> <td>Large Car only</td> <td>41.4</td> </tr> <tr> <td>Train only</td> <td>9.3</td> </tr> <tr> <td>Coach only</td> <td>4.8</td> </tr> <tr> <td>Plane only</td> <td>27.5</td> </tr> </tbody> </table>	Mode	CO ₂ per traveller (kg)	Small Car only	20.5	Large Car only	41.4	Train only	9.3	Coach only	4.8	Plane only	27.5	
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	<p>There is reference to 'restricting non-essential traffic in residential areas' so as to improve the environment (Objective B10). Who is to say what is essential and what is not? This is a ridiculous objective. Roads were built to be used, and trying to artificially restrict what they are used for is simply nonsense.</p>	<p>p25</p>	<p>The Council believes that residents welcome our policy of discouraging vehicle trips in residential areas that do not have an origin or destination in that area.</p>	<p>-</p>												
	<p>Dissuasions include taking on the power to enforce moving traffic offences so as to enable enforcement of box junctions. Presumably the Council is fully aware of the research undertaken by TfL which showed that camera enforcement of box junctions actually impeded the flow of traffic rather than improve it? So I can only conclude that this is simply another scheme to raise</p>	<p>p29</p>	<p>This proposal is not simply about enforcing box junctions, but also about other restrictions which are not fully enforced because of limited police resources. It is accepted that experience with use of these powers elsewhere indicated that a certain amount of discretion is required in camera enforcement of box junctions.</p>	<p>-</p>												

	money from motorists which would in addition make traffic congestion work. Please note our strong objections to this proposal.			
	Reference to 'keeping the operation of bus lanes under review, and continuing camera based enforcement of infringements'. As the major scheme referred to must be Sevenoaks Way bus lane in Orpington, I have to advise you that I continue to receive regular complaints from motorists who turn left through the bus lane and are not impeding any buses whatsoever as the exit is clear. PCN's are continuing to be issued in respect of this pernicious misapplication of the regulations.	p30	The statement in the LIP applies to bus lanes generally and not just to Sevenoaks Way.	-
	It is suggested that all camera enforcement of bus lanes and on-street parking should cease as a matter of principle, and it should not be introduced for moving traffic offences. There are simple other ways of enforcing these matters when necessary, but it's clearly more about raising money from fines than justice so far as the Council is concerned.	-	Given the limited level of police involvement in traffic enforcement, for the moment the Council believes that camera enforcement for these offences can offer the most economical and effective means of enforcement.	-
	Proposals of widening the A21 are welcome as are the 'network pinch point' improvements. We hope that it extends to the redesign of the Highfield Road / Perry Street junction which has been a persistent problem for some years now since it was last changed to introduce much too short a right turn slip lane which causes traffic behind to be blocked.	p31	It is presumed that this is a reference to the Ashfield Lane / Perry Street junction, which is being studied as part of the Council's Congestion Relief programme in 2011/12.	-
South London Freight Quality Partnership	I'd like to start by complimenting you on what is a well structured, clear and concise document that presents its case very well. It is very difficult to find fault with what is written and the majority of my comments will focus on my view of how it can be improved from a freight perspective.	-	Noted.	-
	In particular it was pleasing to see delivery and servicing plans (DSPs) and construction logistics plans (CLPs) included not just as vague aspirations, but given a clear context of how they would fit into the programme	p35	Noted.	-

	of Town Centre Schemes associated with the Bromley Town Centre Area Action Plan.			
	In sections 2 and 3 of the LIP DSPs and CLPs are specifically mentioned in the sections under improving noise impacts. Whilst this is indeed an area where they would be expected to deliver benefits, there are other areas, particularly congestion reduction and air quality improvement, where I would expect their impact to be at least as large if not greater and I would suggest that this is reflected in the final version.	-	A general reference to this has been included in the section on air quality.	✓
	In section 2 you discuss the road network hierarchy, and I wonder if it would also be worth mentioning the London Lorry Control Scheme at this point and also where you expect the majority of HGVs to be focused both when LLCS is and is not in operation?	p19	A reference to the LLCS has been included in the Delivery Plan under Objective B10.	✓
	There is to some extent a divergence between public perception of congestion levels and the general journey delay data for Bromley as a whole, and you rightly identify the importance of pinch points from a personal transportation perspective. Congestion is clearly extremely important for delivery reliability and so commercial interests and the freight transport industry would also support this focus – this would support the high level objectives stated at the start of the document, particularly economic development as freight transport inevitably takes place in parallel with passenger transport on the same transport network.	-	A reference has been included in the Borough Transport Objectives section to make clear that congestion can affect the reliability of deliveries.	✓
	Linked to this is the need to ensure the availability and appropriate use of goods vehicle loading and unloading facilities in industrial areas and town centres. Lack of such facilities can lead to / encourage inappropriate driver behavior linked with goods vehicle operations and can have unnecessary impacts on congestion. I think it would be good if this is acknowledged somewhere in the LIP – possibly in relation to the use of major bid funding applications for the likes of Bromley North	-	A reference to reviewing deliveries and servicing has been included in the commentary on <i>MTS Challenge: Deliver an efficient and effective transport system for people and goods</i>	✓

	Village, Beckenham Town centre and West Wickham Village where an explicit and servicing review element leading to provision of delivery and servicing facilities as appropriate would ensure a coherent overall implementation package.			
	<p>Reference is made to air quality as a problem within the Borough and to the AQAP published in mid 2010. It acknowledges road transport as a primary source of the pollution, but goes no further in discussing the source of the problematic emissions; in fact NOx and particulates are largely a result of diesel engines. In turn heavy duty diesel engines will contribute significantly, which, like it or not, is why the LEZ focused on HGVs. In order to have an impact on this I believe that reference should be made to these issues in more detail and reference made to efforts to improve the overall diesel vehicle fleet and its operation.</p> <p>It is pleasing to see significant thought being given to efforts to improve the specification of the Council's own and its contracted fleet in section 3. This could be driven, in part, through the Council's own delivery and servicing plan. However, it is still possible to drive a well-specified vehicle in a way that does not maximize the benefits and I would suggest that it would be worthwhile to consider signing up to the ECOStars scheme in this regard, both in terms of the Council's own fleet but also to encourage contractors and other local operators to improve their fleet management processes.</p>	p17	<p>The section has been modified to reflect the role of diesel engined heavy vehicles as the source of problematic emissions.</p> <p>The Council does not support the Londonwide Low Emission Zone.</p> <p>The Council will continue to seek to use low emission vehicles (including electric vehicles) where this is operationally and economically justified. However, at a time of spending restraint, these considerations must sit alongside the achievement of value for money in vehicle procurement.</p> <p>The London equivalent of ECOStars is TfL's Freight Operator Recognition Scheme (FORS). The Council will ask TfL to investigate whether there are any elements of ECOStars which could usefully be added to FORS.</p>	✓
	Linked to this, in the performance monitoring table on page 49 the CO ₂ heading seems to have slipped to cover not only CO ₂ but also local air quality issues, which should have a separate heading for indicator N194. This error is repeated in the table at the bottom of page 56.	p49- p56	Noted. It has subsequently been decided that the Council will no longer monitor former NI194 and so any reference to this will be removed in the final LIP.	-

	<p>It is noted that there is a specific budget line of £10,000 per annum for freight activities in the programme of investment on page 41. In the detailed associated table on page 61 I also note that this is allocated to 'Support for freight projects formerly undertaken sub-regionally'. I assume that this means that LB Bromley will in future be letting such projects directly, but hope that the results of this work and any other DSP / CLP work conducted within the Bromley Town Centre Area Action Plan or associated with the major bid funding applications will continue to be shared with the South London Freight Quality Partnership.</p>	<p>p41 p61 p53</p>	<p>The South London Transport Strategy Board has established a freight sub-group, although it is expected that this will deal with policy and lobbying issues rather than promoting projects.</p> <p>Constraints on future levels of TfL formula funding to boroughs mean that it is likely that future consideration of freight issues will be integrated with other projects rather than being funded separately.</p>	-
London TravelWatch	<p>The bus is the only welcome mechanised mode that is accessible to almost all Londoners, has wide geographical coverage, penetrating every neighbourhood and operates 24 hours a day, 7 days a week. Your LIP 2 acknowledges how important the bus service is to Londoners and this is welcome.</p>	-	Noted.	-
	<p>The text suggests in a few places that implementing bus priority and implementing the proportion of bus stops that are accessible is something Bromley should do. However there are no specific proposals for bus priority and it seems no programme of bus stop accessibility works other than including this as part of other schemes.</p>	p22	<p>This is a correct interpretation of the Council's approach. We seek to integrate these measures in other schemes rather than having a separate programme.</p>	-
	<p>Bromley has a poor record implementing accessible bus stops. We believe that it would be most effective if boroughs prioritise those stops without time plates and clearways.</p>	-	<p>The Council does not agree that it has a poor record of implementing accessible bus stops in the Borough. Many bus stops serve rural areas and have limited access for all pedestrians which it would be extremely costly to resolve.</p>	-
	<p>We also would like Bromley's LIP 2 to recognise the 3G bus routes 208 and 54 and work with neighbouring boroughs and TfL to progress whole route improvements along these routes. We would also stress that whilst high profile end to end bus priority is important so are smaller schemes such as reviewing</p>	-	<p>Work on individual bus routes is too detailed for inclusion into the LIP. However, the Council agrees that smaller schemes are important to bus reliability.</p>	-

	waiting and loading restrictions along these corridors.			
	In addition to the target for bus excess waiting time which is welcome, other boroughs are including a target to maintain bus journey times at their present lengths. We would like to see Bromley include this as a local target as passengers want to see their journey times maintained as well as waiting times.	p52	Noted. Whilst LB Bromley will commit to the statutory target for excess wait times, we do not intend to list the journey times target under our local targets due to the limited ability to influence this target. Operational elements of bus services in the Borough are the responsibility of TfL London Buses.	-
	The LIP 2 recognises that congestion is a challenge for Bromley. There are proposals promoted in the Plan that will help, but none seem substantive enough to address the issue of congestion on Bromley's road network, Does Bromley think that the measures in its LIP 2 will maintain congestion at present levels?	p45	Bromley has expressed concern in its response to MTS2 that the MTS may not offer sufficient widespread congestion relief for road and public transport given the forecast growth in population and employment in London.	-
	It is noticeable that levels of cycling in Bromley are low. The target Bromley has set is demanding and there are some proposals, however they again do not appear to be substantive enough to increase cycling rates to the target set. Widespread implementation of 20mph zones, tackling problematic cycling junctions and dealing with one way systems/improving permeability that deters cyclists would be a welcome addition.	p49	We agree that the cycle target was too ambitious, and we have revised it downwards. Bromley will be working on further cycle initiatives for shorter trips in its role as a Biking Borough. The Council does not intend to implement widespread 20mph zones.	✓
	We welcome the proposal for additional cycle parking. However care should be taken to ensure that pavements are not obstructed with even more cycle parking. London TravelWatch would wish to see increasing demand for cycle parking catered for partially on carriageway rather than simply installing stands on the footway.	p61	The Council already considers obstructions to pedestrians when considering locations for cycle parking.	-
	We welcome the commitment to the Better Streets agenda and look forward to seeing streets cleared of guard railing and other clutter, but would also want to see a programme to tackle the most basic problem pedestrians have with London's streets - the lack of level and continuous footways by the implementation of dropped kerbs, entry treatments and crossovers where	p38	The Council's approach to improving access for the mobility impaired is to incorporate measures in individual schemes as they are developed, rather than having a separate programme.	-

	kerbs and other steps in the footway restrict access, particularly for the mobility impaired.			
	Smarter travel initiatives are welcome and have proved successful both nationally and in London at influencing travel behaviour. However, the researchers looking at DfT work in this field concluded that additional measures were needed in order to 'lock in' the benefits otherwise roadspace released by these soft measures would simply be taken up by other new trips due to suppressed demand.	p36	The Council's smarter travel initiatives are aimed at improving awareness and giving people a genuine choice of travel mode wherever possible. It is not the Council's policy to reduce existing road capacity in order to enforce modal shift away from the private car.	-
	We note the comments regarding Princess Royal University. We are aware of the access issues, particularly from the west. We have previously promoted the use of part of the hospital's car park for bus services and pressed the hospital trust to produce a quality travel plan which to date we have not seen. We understand they have a staff only travel plan. Therefore we would like Bromley to press the trust to produce a good travel plan looking at access for staff, visitors and patients in the round. This may or may not demonstrate a need for additional parking.	p14	It is clear that demand for parking at the PRUH by staff, patients and visitors significantly outstrips on-street provision, and extends to nearby private car parks and residential streets over a wide area. While not being opposed to a wider-ranging travel plan, the Council does not believe that this would address the scale of the problem, and that action to improve both public transport and parking provision will be required.	-
Bromley Cyclists	Looking at the Programme of Investment, p41, it is surprising to see sums still proposed to be spent on car parking, especially the Longer Term Investment, p43. How will this discourage car use (volume of traffic) and promote mode shift?	p41	<p>The sums proposed for expenditure on parking in the programme of investment include regular reviews to ensure that on-street parking continues to serve the needs of residents, businesses, the local economy and those with special parking needs such as the disabled.</p> <p>The parking measures included under "longer term investment" include structural repair of an existing multi-storey car park, potentially addressing parking problems attributable to the PRUH (see response to London Travelwatch above). Proposals for Orpington station are aimed at protecting local streets and discouraging railheading to other less suitable</p>	-

			stations.	
	Proposed widening of the A21: Will this aim to provide not just the minimum but an adequate width mandatory cycle lane, on a road where at present high volume and speed, together with poorly maintained cycle lanes, are deterrents to cycling?	p31	There are as yet no proposed designs for a widened A21. The needs of cyclists will be fully considered at the design stage.	-
	Signage: Bromley has made a good start at signage for cyclists, however there are improvements that could be done to assist with mode shift. We would like signs that give the times to named destinations as well as signs that show distance; we would like signs to destinations outside the borough as well as within. Lack of good signage is mentioned as a physical barrier to cycling in the outer London report, p15, together with the need for cycle parking.	-	The Council is committed to effective signage. Signs for cycle routes are prescribed by regulation, and the Council would require consent from the DfT to add times to signs. Cyclists take different times to cycle, so the addition of times to signs is likely to be more problematic than with pedestrian signs. Signs to “external” destinations are not ruled out in principle. For example, there is a sign in Park Road, Bromley indicating Greenwich 7 miles.	-
	Cycle parking: we applaud the proposed increases. However in the future we hope there will be consultation with cyclists as to location of cycle parking, and that it is secure. Some recently installed cycle parking goes unused because of undesirable location.	-	Secure cycle parking is difficult to implement on the highway. The Council actively welcomes suggestions for more cycle parking which we will look to implement subject to proven demand and the availability of funding. Secure cycle parking is possible at rail stations and Bromley is currently working with Network Rail to improve coverage.	-
	Permeability: The LIP proposes, p38, ‘increasing the permeability of streets.’ Cyclists face unique barriers with respect to permeability, and so should not be lumped together with all other users when this barrier is considered. We would like to see a commitment to consultation with cyclists and would-be cyclists over route selection; the LCC can advise the Council on routes that yield maximum continuity with minimum diversion	p38	The needs of cyclists are always considered separately when proposals are being developed. All the Council’s existing LCN+ routes have gone through public consultation, with much of the LCN+ works coming from the stakeholder plans. The Council is committed to involving cycle user groups in the development and implementation of its “biking boroughs” programme, reference to which has been added to the LIP.	✓

	<p>Bikeability programme: this is definitely the star in Bromley's cycling strategy. Children in year 6 receive 1½ days of training; this is being extended to secondary schools with 2 days of training. However, something additional is needed, because we don't see children out on their bikes, even after several years of this award-winning programme. What happens after the cycle lesson, what is the follow-up? Children lack role models who cycle; parents see the roads as too dangerous. Yes, adult Bikeability is also available and being promoted, but how many are taking it up? Any movement towards mode shift will be a response to Bikeability and something more.</p>	-	<p>The Council has recently started to engage parents as part of Bikeability training. Training is offered to parents of children in year 6 and above in order to impart the skills to cycle with their children and the confidence to allow their children to cycle on road both accompanied and unaccompanied. The effectiveness of this initiative will be kept under review.</p>	-
	<p>One possibility is a cycling club in every school. The LCC has fostered a beginning in several schools – with the help of volunteers from the cycling community. Why doesn't the Council support this very cheap resource as an integral part of its cycling strategy? A first schools cycling competition involving 17 primary schools was held in the borough in 2010, fostered by the LCC. Why not commit resources to enable this to reach every primary and secondary school?</p>	-	<p>In order to continue cycling interest once we have completed training in schools, we are encouraging teachers to set up cycling clubs within school. In order to facilitate this, an ACAT course (Activity Coaching Award for Teachers) has been organised that will provide teachers with the necessary skills.</p>	-
	<p>The outer London report identifies 'vulnerability, lack of confidence, and lack of identification [not believing cycling is a suitable activity, as the most deep-rooted emotional barriers.' (p16) What about increased consultation with cyclists about how to motivate would-be cyclists? One of the imaginative approaches suggested by the outer London report is community cycling projects. The LCC ran a bike festival in Norman Park in the summer of 2010, in conjunction with the Road Safety Team. What about a commitment to such high profile projects that attract novice cyclists and have been proven in other places as successful? What about a mini-Skyride similar to those held in Hounslow and Redbridge, where outside funding was on offer? Or a scheme of led rides on cycle routes in the borough,</p>	-	<p>Following the success of the interschools cycling competition held in the borough in 2010, plans have been made to run it again in 2011, with more schools involved. The effectiveness of this initiative will be kept under review.</p>	-

	from cycling hubs?			
	Traffic speed and volume: The outer London report identifies these as 'one of the main physical barriers.' They are the reasons we hear most for not cycling. For example, some sections of some cycle routes, such as LCN 27 between Shortlands and Penge, are also vehicle 'rat runs.' What about addressing this fear of cycling, usually related to traffic speeds, with imaginative traffic calming measures? Why have 20mph zones been rejected on the basis of a moral principle (right of freedom for local residents' use of their roads, as mentioned in the first draft of the LIP) rather than been considered rationally and reasonably as a possibility? To increase cycling is to move towards shared road space, in terms of both use and responsibility, by motorists as well as cyclists.	-	It is accepted that some roads in the borough suffer from vehicles being driven at inappropriate speeds. Many local streets have already been treated with various design features to deter rat-running or to slow traffic. The Council already has a number of 20mph zones and it does not reject them as a matter of principle. However, it is not the Council's policy to implement blanket 20mph zones irrespective of site-specific justification.	-
	A cycle hub: Council officers were on to something very exciting for cycling when they were suggesting in the spring of 2010 the possible development of cycle hubs as a means to encourage the take up of cycling as transport. Such a facility would be used by local cycling clubs such as the LCC as a base for helping adults and children overcome their fear of cycling, as well as making a very prominent, visible statement of encouragement to mode shift. Could the Council not find the funds for at least one hub, in, say, Norman Park? Requisite facilities need only be simple to be effective, as can be seen in, e.g., Dulwich Park. Local cycle clubs, with the availability of a proper and visible facility, are ready for (and already doing) the next step of helping adults and children to mode shift. What about a commitment to working with local cyclists in this way?		The Council has acknowledged in its Biking Borough strategy the interest of local cycling groups and stakeholders for a cycle track at Norman Park. However, our application for biking boroughs funding for this project was unsuccessful.	-
	HGV safety: we applaud the fact that Bromley has achieved bronze membership in the Freight Operators Recognition scheme, which goes some way towards safety for cyclists with respect to lorries. What about	-	TfL have recently informed all London Boroughs that road cycle training for lorry drivers will be delivered centrally by TfL's freight team and as such no allocation of funding to boroughs has	-

	providing road cycle training for lorry drivers as pioneered in Lambeth?		been made for this. The Borough is however proceeding with HGV awareness events for cyclists across Bromley.	
	Value for money: The political and financial case for investing in cycling looks very good at the moment. We are advised that DfT figures show a healthy return on cycling investment - depending on the project, for every £1 spent, a value return of at least £1.50 (the UK Cycling Demonstration Towns apparently showed a return of £3 for every £1 spent) can be experienced in terms of increased cycling, improved health and wellbeing (reduced costs to the NHS), improved journey times (benefits to business), reduced congestion and overcrowding (from mode shift) and reduced need to spend on increased capacity on other modes (such as extra train carriages or road lanes). The outer London report says the cost-benefit ratio can be as high as 20:1. Cycling will also enable London to accommodate its rapidly growing population.		Noted.	-
	Has Bromley really mainstreamed cycling across the borough council? This is suggested by the outer London report, p18, and in keeping with Bromley's status as a Biking Borough. What about a cycling champion for the borough, to be a role model and enthusiast? Bromley's heavy reliance on cycle training to date places the burden on cyclists for road safety – this burden in the end will also need to be shared by motorists, if cycling is a valid means of transport, and if there is to be significant mode shift and the reaping of all its attendant benefits. Have councillors considered why they do not cycle more, and what they would need themselves in order to do so?		In addition to cycle training, the Council's programmes include cycle routes and cycle parking, promotion of cycling via school and workplace travel plans, encouragement of cycling by staff and our participation as a biking borough. While the main purpose of cycle training is to promote safety, it also aims to build confidence so that participants will feel able to choose cycling for their journeys.	-
Bromley Mobility Forum	Is there a commitment to improving access to transport for people with reduced mobility? Is transport accessibility for older and disabled people adequately prioritised in the LIP objectives?		The Council considers that LIP Objective B8 adequately addresses this issue.	-

	Is there a commitment to pressing for more step free stations in the Borough? We fully appreciate the existing accessible stations and look forward to the start of works at Bromley South, but the majority of stations in the borough remain a barrier to wheelchair users and those with mobility issues.		The funding and programming of station improvements is the responsibility of the DfT and the rail industry. The Council will continue to work with the rail industry as proposals emerge to ensure the co-ordination of “on-street” with “off-street” works to improve station accessibility.	-
	Does the LIP include a commitment to accessible street design? This is especially important to wheelchair and scooter users, and blind and visually impaired people.		The Council considers that LIP Objectives B7 and B8 adequately address this issue.	-
	Does the LIP commit to retaining and increasing, disabled parking bays?		The Council considers that LIP Objective B8 adequately addresses this issue	-
	Does the document mention the value of community transport schemes, such as BATH and Shopmobility? Is there a commitment to funding these?		While the Council has previously tried to assist with funding bids to support community transport and shopmobility, there is no commitment in the LIP for the Council to fund projects of this kind.	-
	Journey planning and travel information needs to be available in a variety of formats, including large print and audio, so it is accessible to all. The Bromley Accessible Transport Guide will be a real boon for disabled travellers but has the borough considered Talking Bus Stops?		As part of TfL’s new Countdown system, a new real time information system will be rolled out to almost 100 bus stops within the Borough. As part of this new system there will be the facility for people with hearing and visual impairments to have access to a ‘fob’ that will enable them to hear the estimated wait times.	-
	Is there a commitment to improving public transport services for those on the outskirts of the borough, like Biggin Hill where disabled people can feel especially isolated?		The Borough Transport objectives section of the LIP identifies relatively low public transport accessibility (particularly for orbital journeys) and social exclusion amongst those without car access or unable to use public transport as two out of six main transport pressures affecting the borough. There are no commitments in the LIP to specific public transport improvements in the outer parts of the borough, over and above those covered by the eleven LIP objectives.	-
	We believe that life experiences of people with disabilities can be extremely helpful in the development		It has been agreed that Bromley Mobility Forum and the “Experts by Experience” group will be	-

	<p>of strategies and the practical outworking of projects, over and above Codes of Practice, Building Regulations, British standards etc which relate to accessible design but are often only guidance and don't cover all aspects of disability.</p> <p>What we would really value therefore is the opportunity to influence projects at the design stage to avoid inaccessible and sometimes dangerous mistakes which are then much more costly to remedy.</p>		added to the Council's consultation lists.	
<p>E.A.Bradley, Chairman Green Street Green Village Society.</p>	<p>I will not labour the point too much but it does seem to me that its character as a virtually free-standing community at the southern entrance to the Borough from the M25 needs some particular consideration. I would submit, for example, that its status is of a different nature to, say, Cotmandene Crescent and Coney Hall. It is not listed in the table on p.5 as a local centre when the two Crays are. I am not talking about 'status' in some sort of 'upmarket' sense but in terms of traffic passing through the village, both from the M25 bound for Orpington and places north and west and from the Orpington bypass aiming for Croydon etc. Our High Street and the Glenframmon Road/Farnborough Hill axis need more consideration than is shown in the draft.</p>	p5	<p>In the Council's Unitary Development Plan, Green Street Greet is classified as a Local Neighbourhood and Shopping Parade. The LIP merely reflects this status in the Council's hierarchy of local centres.</p> <p>Green Street Green has recently benefited from some minor traffic and safety improvements, and a review of local parking is scheduled for 2012/13.</p>	-
	<p>A second point to be considered is the impact on a relatively small but heavily settled area of two major centres of employment, namely the Bus Garage and the Waitrose supermarket. We also have two Medical Centres and a number of relatively specialist shops which attract custom from a wide catchment area. For a small village on the outskirts of the Borough we have more than our fair share of bus routes.</p>		Noted.	-
	<p>It would be interesting to see how our village stands in the demographic of a very high percentage of older people. My impression is that our local population has an unusually high proportion of elderly residents. With</p>		<p>11.54% of residents in Green Street Greens ward are aged between 65-74 years of age. This compares with a figure of 8.6% for Bromley as a whole. (Census 2001)</p>	-

	that in mind I find, after living here for seven years after fifty in Orpington itself, that the impact of traffic locally is very harsh and getting worse all the time.			
Chris Jones Bromley Cyclists	The Borough would benefit greatly if everyone were encouraged to cycle for everyday journeys. Most people are scared out their minds to even consider cycling to the shops/church/school/work because the motor volumes and speeds are terrifying! The idea that we'll get 5% modal share by 2026 in Bromley is fantasy. Unless the road environment is made a whole lot more attractive for the ordinary person, then I'm afraid most people will vote with their feet and drive those very short journeys that could so easily be cycled instead.	p51	The Council agrees this target is too ambitious and it has been changed. The Council intends to encourage cycling for short local journeys via the "biking boroughs" initiative.	✓
	Why 2026 for 5% modal share? It should be two years max, so 2013 tops. If it's to be a meaningful target then it needs to be a short term target - 2026 is an insulting target	p51	As part of the Mayor's commitment to increase cycling by 400% by 2026, the mode share will be 5% across London by that date. Bromley expects to reach a 3.3% cycle mode share by 2026 in line with the Mayor's target. Subsequent to this, shorter term milestones have been set with a 1.5% cycle mode share target by 2013/14.	✓
	Please, no more pinch points. If you ride a bike regularly, you'd know that they are terrifying. Drivers insist on overtaking at pinch points. Even more intimidating is when an on-coming driver forces their way through regardless if the cyclist has priority - truly, truly terrifying.	p16	The Council agrees that pinch points can provide unnecessary obstruction to traffic.	-
	More thoughtfully designed segregated infrastructure please no Super Highways. Please look to the Netherlands for a beacon of best practice. A good website describing good cycle path infrastructure can be found here: http://hembrow.blogspot.com/search/label/cycle%20paths .	p36	As a Mayor's High Profile Output, the Council is required by LIP Guidance to report on Cycle Super Highways .	-
	If you truly want 5% modal share for cycling (but hey, why so low, what's wrong with 10, 15, 20%), then you may also consider permeability measures. These make	p51	The Council already considers cyclist permeability as part of scheme design.	-

	<p>cycling much more attractive, because it allows cyclists to permeate a street while a car driver has to go the long way around. This not only returns residential streets to it's residents - whilst removing the rat runner - it also makes cycling journeys a lot more attractive, with shorter journey times (compared to driving) and lowers car volumes and speeds through residential areas. I was cycling the other day through Farnborough Park - a gated community, which has rising bollards at all its entrances. It allows pedestrians, cyclists and resident motorists free access, whilst barring rat runners. The cycling environment within the estate was very pleasant - why not replicate this across the borough? You wouldn't even need rising bollards, you could have permanent bollards strategically placed on major rat runs.</p>		<p>The roads within Farnborough Park are all classified as Private Streets and, unlike highway, cyclists cannot use them as a matter of right.</p>	
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