

**Transport for London**



# **Cycling on Greenways Implementation Plan**

## **Consultation Summary**



### **Surface Transport**

Transport for London

Cycling, Walking &  
Accessibility

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**MAYOR OF LONDON**

## Table of Contents

Table of Contents .....	2
Introduction .....	4
Timeline of development .....	4
Key Issues .....	5
Consultation List .....	6
Stakeholder responses and TfL actions .....	7
ALG - Association of London Government .....	8
London Borough of Ealing .....	8
Environment Agency .....	11
Hampstead Society .....	12
Living Streets .....	13
London Cycling Campaign .....	17
London Mobility Advisor Partnership .....	20
London Wildlife Trust .....	22
Metropolitan Police .....	25
Ramblers .....	28
Royal Parks .....	34
Walk London .....	35
Sustrans .....	44
Transport 2000 .....	45
Further comments received 2007-2008 .....	47
Sustrans .....	47
City of London .....	49
British Waterways .....	49
Living Streets .....	50
COG EqIA Comments .....	51

City of London.....	51
TFL – Walking Programme Team.....	51
Capita Symond .....	53
Appendices.....	57
Appendix 1: Letter to stakeholders inviting comments on COGIP .....	57
Appendix 2: Cycling on Greenways EqIA Action Plan .....	58
References .....	62

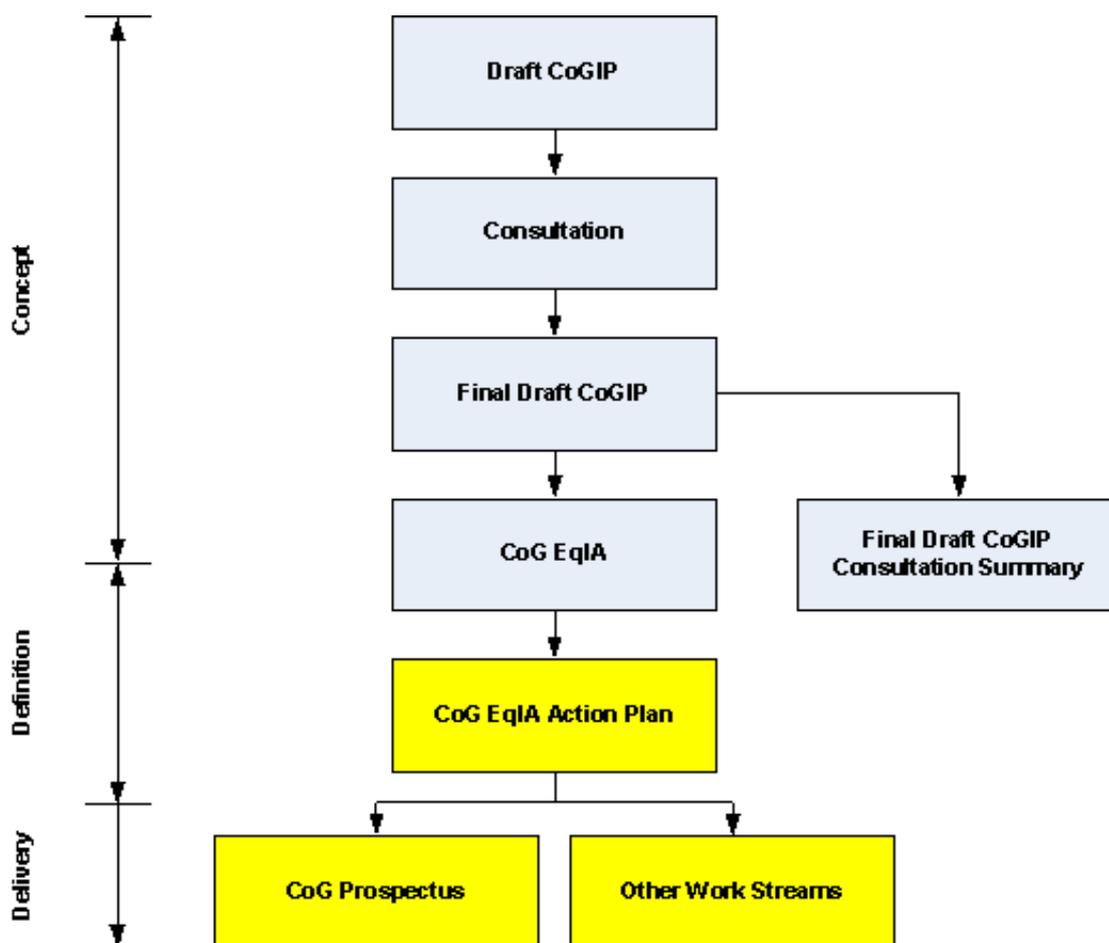
## Introduction

This report presents the outcomes of stakeholder consultation for the Cycling on Greenways Implementation Plan (COGIP), conducted during 2006. There was further feedback collected during 2007/08 in response to the final draft COGIP and the Equality Impact Assessment (COG EqIA), which is also included in this report.

The intent of this report is to capture the interest and energy that has been generated over the past two years during the development of the Cycling on Greenways programme and ensure that it leads to strong outcomes through the EqIA Action Plan.

## Timeline of development

JAN 2006	Release of first draft COGIP
JAN – JUN 2006	COGIP circulated within consultation for comment
JAN 2007	Release of final draft COGIP
NOV 2007	Release of COGIP Equality Impact Assessment (COG EqIA)
MAY 2008	Release of COG EqIA Action Plan (COG EqIA Action 1.2)
DEC 2008 (tbc)	Release of COG Programme Prospectus (COG EqIA Action 1.3)



The issues raised during consultation have all been acted upon, which is shown in detail and in summary in the next section.

## Key Issues

During consultation a number of consistent key issues and themes emerged. These guided development of the COG EqIA and will be addressed through the COG EqIA Action Plan.

Issue	Comments
<b>1. Pedestrians and Disabled Users</b>	<ol style="list-style-type: none"> <li>1. These groups are not fully considered within the document.</li> <li>2. The quality of walkers experience should not be compromised</li> <li>3. Ideally paths will be segregated.</li> <li>4. Inadequate thought to disabled, in particular sensory impaired.</li> </ol>
<b>2. Objectives</b>	<ol style="list-style-type: none"> <li>1. How will the objectives be delivered through the GIP? How will success be achieved and measured.</li> </ol>
<b>3. Behavioural Issues/User Education</b>	<ol style="list-style-type: none"> <li>1. Cyclist behaviour is a current problem that needs to be tackled.</li> <li>2. Some type of 'Good Manners Policy' required to convey to all groups, those considered to be the priority groups.</li> <li>3. Anti-social behaviour in some areas is a deterrent to their use.</li> </ol>
<b>4. Terminology</b>	<ol style="list-style-type: none"> <li>1. Shared use – clarify that this covers segregated and unsegregated paths and the preference is for the former, wherever possible.</li> <li>2. Debate over title - Greenways/Cycling Greenways.</li> </ol>
<b>5. Guidance</b>	<ol style="list-style-type: none"> <li>1. Other guidance should be referred to such as Countryside Agency, DfT's Local Transport Notes (2/86 &amp; 2/04), CTC 'Cyclists and Pedestrian Attitudes to Shared Use Facilities'.</li> </ol>
<b>6. Design Issues</b>	<ol style="list-style-type: none"> <li>1. Minimising conflict (perceived and actual) is key concern.</li> <li>2. Limitations of LCDS for this and need for supplementary guidance.</li> <li>3. If paths are shared, signage is key to conveying the priority afforded to groups (pedestrians) to reinforce message.</li> <li>4. Branding of routes – consistent signage required?</li> <li>5. Physical barriers are not an adequate solution; the aim should be a (physical) barrier-free network.</li> <li>6. The use of environmentally-friendly lighting should be considered.</li> </ol>
<b>7. Maintenance</b>	<ol style="list-style-type: none"> <li>1. A commitment to maintenance is required from all managing authorities. Not just surfacing of the route, but also to include tree maintenance to ensure sight lines are retained.</li> </ol>
<b>8. Co-existing of pedestrians and cyclists</b>	<ol style="list-style-type: none"> <li>1. Disabled group (London Mobility Partnership) challenge that both groups can co-exist - particularly those with sensory impairments.</li> <li>2. Furthermore, they indicate that existing pedestrian paths should not be converted as they are likely to legally challenged under DDA as not meeting the needs of those with sensory impairments.</li> </ol>
<b>9. COG Forum &amp; Consultation Process</b>	<ol style="list-style-type: none"> <li>1. Forum should include pedestrian, disabled groups and London wide environmental group as core members.</li> <li>2. Full consultation is required with all these groups.</li> <li>3. Several comments regarding inadequate consultation timescale</li> </ol>
<b>10. Monitoring</b>	<ol style="list-style-type: none"> <li>1. Argument that some people will stop using the facility once converted. How will this be monitored?</li> </ol>
<b>11. Environmental Consideration</b>	<ol style="list-style-type: none"> <li>1. There are some areas where implementing Greenways will not be in keeping with the current environment.</li> <li>2. Use of space for primarily leisure activities.</li> </ol>
<b>12. Other</b>	<ol style="list-style-type: none"> <li>1. Should pedestrian/disability/environment groups be represented as core members on the Forum or retained as key stakeholders?</li> <li>2. Terminology of Greenways vs Cycling Greenways</li> <li>3. Route Branding – appropriate/necessary?</li> <li>4. Signage</li> </ol>

## Consultation List

This list shows stakeholder groups and the individuals directly consulted for feedback on the draft COGIP<sup>1</sup> via a letter sent out with the draft COGIP (see Appendix 1). Eighteen responses were received from the stakeholders who were consulted, which are shown in the next section.

Tom Bogdanovich	London Cycling Campaign (LCC)
Roger Geffen	Cycling Touring Club (CTC)
Carl Pittam	Sustrans
Chris Bainbridge	Borough Cycle Officers Group (BCOG)
Mark Camley	The Royal Parks
Tony Leach	London Parks and Green Spaces Forum
Jennifer Adams	Open Spaces, Corporation of London
Martin Wright	Lee Valley Regional Authority
Louise Fishleigh	British Waterways
Becky Upfold	Greater London Authority (GLA)
Marisa Ker	Association of London Government (ALG)
Cycling officers	All London Boroughs
Richard Hebditch	Living Streets
Richard Bourn	Transport 2000
Jim Walker	London Walking Forum
Des de Moor	Ramblers Association
Derek Purcell	Ramblers Association
Ben Van Bruggen	Commission Architecture & the Built Environment (CABE)
Nicholas Birkbeck	Environment Agency
Ute Navidi	London Play
Gary Cliffe	Strategic Walks Group
Nicholas Russell	London Mobility Advisory Partnership, via L Barker - ALG
Shelley Gould	London Waterways Commission, via Tom - LCC
Jenny Scholfield	London Wildlife Trust
Jeremy Wright	Hampstead Heath Society
John Collier	Forum of the Friends of Royal Parks
Jim Strike	EDAW
Jenny Budd	Walking to Health
Kathleen Aubeelack	Metropolitan Police
GLAD Greater London Action on Disability	
Walking Advisory Panel including London Access Forum	

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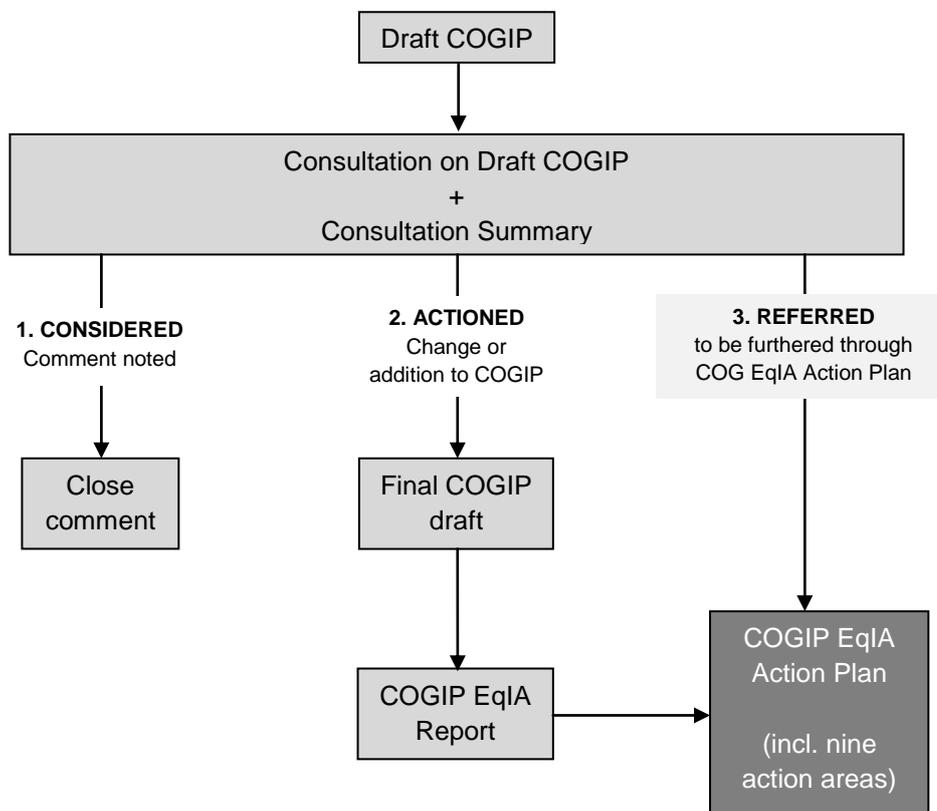
<sup>1</sup> The contact person for each stakeholder group was correct at the time of consultation, May 2006

## Stakeholder responses and TfL actions

Responses from each stakeholder are listed in a summary table with comments and/or response to each from TfL. The comments recommend a course of action which has been taken or will be taken, in one of three ways.

1. **Considered:** and noted but no further action taken
2. **Actioned:** change or addition to final COGIP draft
3. **Referred:** to be furthered through EqIA Action Plan  
(A copy of the EqIA Action Plan is in Appendix 2)

The flow chart shown illustrates this process, showing stages which are now complete in light grey and those which are currently active in dark grey.



## ALG - Association of London Government

**Name:** Marisa Ker  
**Organisation:** ALG  
**Format:** Email  
**Date received:** 9 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
434, 4.9, 6.4 Alter 33 London Boroughs to 33 London local authorities. The City of London is no longer called the Corporation, nor is it a borough.	Actioned	Complete

## London Borough of Ealing

**Name:** Colin McKenzie  
**Organisation:** London Borough of Ealing  
**Format:** Email  
**Date received:** 18 May 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
As a transport organisation, TfL should mainly be interested in cycling as transport, not as a leisure activity	Considered: Where possible, routes will be developed for both leisure and commuter. However, getting people on to bikes for leisure can improve cycling confidence. Hence cycling is seen as an alternative transport mode and result in commuter/business trips by bike.	Complete

	COG was introduced as part of a package of measures set out in the London Cycling Action Plan. It is beneficial and complimentary to these programmes.	
The concept of routes is not particularly helpful for utility cycling. Cyclists will generally not divert far off the shortest route, as this costs time and effort. Consider instead networks, short cuts, priority, and permeability. The cycling network consists of the road networks, less motorways, plus off-road cycle routes. It therefore follows that the most useful routes are the ones that don't parallel roads. Short cuts attract cyclists by reducing distance and effort. Priority at crossing points saves time and effort, making cycle routes more attractive Permeability ensures that all destinations can be reached efficiently - not just those that are on a designated route.	Considered: some will if they consider them to be a safer, more pleasant environment. Hence these routes are also for leisure and not just commuting.  Short cuts and permeability are dealt with through particularly through the non-LCN+ LIP budget.	Complete
Greenways should be seen as a way of extending cyclists' range, and making the experience more pleasant. Cyclists who will only cycle on Greenways or very quiet roads are unlikely to do much utility cycling. They should be targeted for training to enable them to use the road network safely and confidently.	Considered: The main point is to promote confidence so that they consider cycling for other trips. Cycle training is another TFL funded initiative provided by the boroughs.	Complete
3.6 Cycling had increased by 72% in Central and inner	Actioned: Reflected bias to inner	Complete

London. It's gone up much less, if at all, in the suburbs.	London	
4.6 Needs specific mention of keeping out motorcycles. This is generally done with barriers, which can also restrict cycles with luggage, disabled cyclists, wheelchair users, cycle trailers etc. The best way is by enforcement, including police patrols, but parks and waterways officials rarely believe this. They need to be shown convincing research results.	Actioned: Although TfL are currently trying to identify alternative treatments to physical barriers	Complete
The aim should be to have a network with no barriers requiring cyclists to dismount, and negotiable by tricycles, tandems, and bikes with trailers and panniers.	Actioned	Complete
4.9 Consider adding CTC and Cycle Training UK, or another cycle training provider.	Considered: They're not forum members  CTC added to 4.10 Re local cycling organisations	Complete
5.3 Boroughs will generally find BSP funding more convenient, so that existing financial systems are used.	Considered: However it comes from a different funding source and can not be processed through the BSP	Complete
7.3 These criteria look good.	Considered	Complete
7.4 There may be opportunities for routes alongside railways, as well as waterways, especially when the line is in cutting and/or has fewer tracks than it used to. E.g. East Acton to Northolt Junction.	Considered. Such schemes would not be excluded  Actioned: Scheme option noted	Complete

8.24 (footnote) I'd like to see this guidance asap.	Actioned	Complete
9.9 Is there any likelihood of a long-term commitment of funds for maintenance, especially trimming vegetation and removing graffiti?	Considered: No	Complete
9.12 The biggest factor in avoidance of conflict is width. Extra width always helps. Is it worth considering a hard path with compacted gravel or hoggin either side, rather than full-width tarmac, in suitable places?	Considered: Although this is not always possible e.g. towpaths	Complete

### Environment Agency

**Name:** Verity Lee  
**Organisation:** Environment Agency  
**Format:** Fax  
**Date received:** 2 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
Include buffer zones to watercourses – where possible, set back minimum of 8m from the banktop of a main river or 5m of a non-main river	Considered: Not always possible, very few areas will we be able to provide this. Local issues will be addressed through the Green CRISP process.  Referred	Ongoing  EqIA Action 4.2
EA asks to be involved in design location of new	Referred	EqIA Action 4.2

cycle/footways which are in proximity to watercourses		
Presents other useful policies on green networks etc	Considered	Complete

### Hampstead Society

**Name:** Jeremy Wright  
**Organisation:** Hampstead Society  
**Format:** Email  
**Date received:** 15 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
<p>From DfT LTN 2/04 LTN 2/04 - Adjacent and Shared Use Facilities for Pedestrians and Cyclists</p> <p>NC keen for us to be in keeping with DfT terminology within GIP</p> <p>1.1.2 The title for this document has changed from that of LTN 2/86. This reflects the need to clarify the distinction between segregated and unsegregated use. Routes generally used by pedestrians and cyclists only, are now referred to as adjacent or shared use routes. <b>Adjacent use</b> exists where a cycle track is provided in close proximity to a footway or footpath but is segregated from it in some way. The term <b>Shared use</b> has now been re-defined to describe a route over which there is no</p>	Referred	EqlA Action 5.1

segregation between cyclists and pedestrians.		
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## Living Streets

**Name:** Simon Barnett  
**Organisation:** Living Streets  
**Format:** Letter received on Email  
**Date received:** 8 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
Inadequate consultation period	Considered	Complete
Unclear how the high level objectives translate into the delivery of the Implementation Plan.	Actioned	Complete
Indicate that objectives are not mutually reinforcing and may actually be in conflict.	Actioned	Complete
Benefits of walking are mentioned but not really quantified as the main focus of document is on cycling.	Considered	Complete
New policies affecting streets and open spaces should seek to encourage walking.	Referred: this is a key theme that has been addressed through the EqIA and subsequent EqIA Action Plan	EqIA Action Plan
Changes to the physical environment are required which will often benefit cyclists.	Considered: Any funding given for the development would need to demonstrate benefits for both	Complete

There may be conflicts if facilities poorly designed	Referred	EqIA Action 5.1
Streets/public places should have multiple uses not just traffic corridors	Considered: the greenways are seen as leisure areas too	Complete
Open spaces should be available for all with a primary role for recreation and relaxation	Considered	Complete
Oppose shared use of paths which may lead to conflict or intimidate vulnerable users. Typically other more preferable alternatives exist. Shared use should be a last resort.	Referred	EqIA Action 5.1
If the path is to be shared, pedestrians must have priority and signage should make this clear.	Referred	EqIA Action 5.1
Shared use should not be allowed where there are high numbers of cyclists/pedestrians; cyclists are travelling at high speeds; narrow widths to accommodate all users.	Referred	EqIA Action 5.1
Where paths run alongside each other adequate segregation is required e.g. landscaping or level differences.	Referred: Partially agree although there may need to be crossing of each path in which case physical segregation may hinder this.	EqIA Action 5.1
Cyclist behaviour – need for enforcement of restrictions within parks to avoid conflicts.	Referred	EqIA Action 5.1
3.1/3.2 Any changes to the environment should retain the	Actioned	Complete

use of the space for recreational purposes.		
Unclear if the purpose of greenways is to encourage cycling for leisure or commuting.	Actioned: Intent has been clarified	Complete
Kensington Gardens – care is needed when introducing changes to one section of a park for its impact on other areas to retain the recreational aspect.	Considered: location specific, which has recently been addressed by the Royal Parks	Ongoing
Introducing cycling in underused parks could improve security through presence.	Considered: Agreed	Complete
Introducing cycling in heavily used parks may result in more conflicts. In these instances route cyclists around the perimeter.	Referred design, signage and adequate marking will be necessary to minimise conflicts	EqIA Action 5.1
Ambiguity regarding the impact of proposals. IT suggests that all parks are being opened up for cycling but implies the impact will be more limited.	Considered: Funding for future years is not guaranteed at current time. Opening of parks is ideal but requires the agreement and commitment of the managing authority and also the required space to provide such facilities safely.	Complete
Indicate how objectives translate into action.	Considered	Complete
Stress the character of places should not be altered i.e. still areas for recreation and relaxation	Actioned	Complete

Appraisal of bids need to balance potentially contradictory objectives in 1.12. Appraisal needs to consider the needs of all vulnerable users not just mobility impairments.	Actioned	Complete
Design guidance – LCDS is limited for these links.	Referred	EqIA Action 5.1
Enforcement of segregation is important	Referred	EqIA Action 7.1
Box after 1.9 – elements are unclear – is this a summary or principles? Useful to link them to objectives and criteria	Actioned	Complete
1.10 perception of risk important as well as actual collisions, particularly for vulnerable users	Actioned	Complete
1.12 how do these objectives translate within plan and how assessed if they came into conflict?	Considered	Complete
1.12 clarification as to new routes or upgrading existing routes	Actioned	Complete
5.2 main benefit from these schemes is for cycling, would express concern if walking funding was used unless demonstrable benefit for pedestrians	Considered: Benefit of improved/new routes should be mutual but cycling is likely to be the biggest benefit and cycling is the anticipated increase	Complete
5.21 user satisfaction – include the views of peds and disabled groups	Referred	EqIA Action 8.1

Section 7 how does criteria relate to goals in 1.12	Considered	Complete
7.3 point 6 include benefit of pedestrians and those using the park for other leisure pursuits	Actioned	Complete
7.3 point 9 mobility impairment should include other disabilities such as sight/hearing problems	Actioned	Complete
7.3 criteria about the character of the open space related to developing routes in harmony with local aspirations	Considered: More a design principle rather than a specific criteria for scheme assessment(all schemes should do this)	Complete
8.13-8.23 review design standards for cycle paths in parks including auditing walkability and segregation	Referred	EqIA Action 5.1
9.1-9.7 signage important for indicating priority and segregation	Actioned	Complete
9.10-9.17 review design standards to ensure conflict minimised	Referred	EqIA Action 5.1
Section 10 monitoring process should include impact on pedestrians and vulnerable users and on the character of the open space	Referred	EqIA Action 8.1

## London Cycling Campaign

**Name:** Tom Bogdanowicz  
**Organisation:** London Cycling Campaign

**Format:** Email  
**Date received:** 31 May 2006

Authors note: Comments on previous version (late April) so be aware that paragraph numbers may not coincide

<b>Consultation Response</b>	<b>TFL comments and response</b>	<b>Status (Nov 2008)</b>
1.5 It is worth noting that these projects have not yet been completed and there are major breaks in continuity. Completion of the canals programme is of significant importance to improve conditions for all users.	Referred	EqIA Action 3.1
1.8 The illustration is not in keeping with best practice which seeks to minimize use of white markings in parks.	Considered	Complete
1.10 There are also examples in London and other locations in the UK.	Considered	Complete
1.13 Another important objective for the programme should be to improve integration with on-road routes which is currently poor e.g. routes 6 / 7 / 8 / 9 / 10	Actioned	Complete
1.14 The Greenways programme could be enhanced by providing several 'quick wins.' Where these are related to the Olympics, the 2012 deadline should not act as a deterrent to completing works much earlier. Such projects should be de-coupled from the Olympics as appropriate.	Referred	EqIA Action 3.1
5.16 The concept of route managers is welcome. Their role, and overall programme management, would be	Considered: The delivery agents are	Complete

enhanced by giving them control of funding rather than sharing this role between boroughs. (Boroughs may not see greenways as a traffic/highways dept responsibility)	given the funding.	
7.2. Some short links, such as Regent's Park, may have a very significant impact and are worth prioritising.	Considered: although long distance links require more lead-in time and funding to implement.  Actioned: Text 'to reduce focus on long distance links although still important'	Complete
7.3 Suggest deleting the first two bullet points	Considered: Disagree, although they are probably not the most important criteria  Actioned: Revised bullet point listing in terms of importance. Reviewed term flow to include routes not currently walked/cycled i.e. 'desire'	Complete
7.4 The list omits several parks which are of significant important e.g. Wanstead Flats ; Highgate Woods ; Mitcham Common; The Greenway (Newham). It is worth noting (see above) that just one piece of greenspace can make a route significantly more attractive e.g. London Fields.	Considered: Agreed but this list is not exhaustive	Complete
8.16 This is a significant point e.g. Croydon Cem; Ealing Cem; several sections of the Wandle Trail	Actioned	Complete

8.20 This is NOT necessary - but regular maintenance is. Local Authorities cannot be relied upon to maintain routes, as shown by formerly good routes being allowed to deteriorate badly. It is essential to appoint on-going route managers/stewards (who are properly funded).	Considered	Complete
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### London Mobility Advisor Partnership

**Name:** Nicholas Russell  
**Organisation:** London Mobility Partnership  
**Format:** Letter on email  
**Date received:** 7 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
Accept Cycling Greenways can be advantageous to those in wheelchairs. Other older and disabled groups particularly those with sensory impairments experience a danger of being involved in a collision.	Actioned	Complete
Believe the environment must be fully accessible to all. Support for the Joint Committee on Mobility of Blind and Partially Sighted Peoples policy statement "adjacent facilities for pedestrians and cyclists"	Referred	EqIA Action 5.1
1.10 not support the assertion that properly designed facilities can minimise the incidence of accidents. Research surveys those that continue to use the facility rather than those that stop using the facility e.g. visually	Referred	EqIA Action 5.1

impaired pedestrians.		
JCMBPS statement indicates shared use only acceptable in rural, sparsely populated areas where routes are used infrequently.	Considered: Difficult to apply to London. By not providing these facilities potentially more people are disbenefited	Complete
4.6, 4.8-4.9 Membership of Forum does not include older or disabled groups	Considered Referred	Complete EqIA Action 6.1.1
7.3 Criteria outlined for prioritising schemes is good but requires full consultation with older and disabled groups.	Actioned: Text stating as with all schemes, full consultation should be undertaken prior to implementation during design	Complete
8.11 Assert that no existing paths are converted to greenways as they are unlikely to meet the needs of those with sensory impairments and may be legally challenged under DDA.	Referred	EqIA Action 5.1
8.24 Support the need for barriers to be removed as benefits wheelchair users. However, the removal should not encourage motorbike into these areas.	Actioned: Text altered	Complete
9.10-9.14 regarding reducing conflicts – this can be achieved through full consultation with the relevant older and disabled groups. Notwithstanding this, still not support the principle of shared use without the appropriate segregation.	Referred	EqIA Action 5.1 EqIA Action 6.1.1

10.7 monitoring should include affect of the shared paths on older/disabled people hence representative organisations should be involved in the process.	Referred	EqIA Action 8.1
11.10 Do not accept the research that pedestrians and cyclists can co-exist for reasons outlined above.	Referred	EqIA Action 5.1

### London Wildlife Trust

**Name:** Jenny Scholfield  
**Organisation:** London Wildlife Trust  
**Format:** Email  
**Date received:** 13 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
Para 1.9  The Trust supports the statement of this paragraph that <i>'the environment is considered as equally important, if not more so, than the transport provision element'</i> . Therefore we recommend that the text of last sentence should be altered to address potential significant impact on wildlife value;  <i>'...<b><u>the location and</u></b> design will need to reflect this requirement to protect local wildlife and amenity'</i>	Actioned	Complete
Similarly in section 2.6, the Trust would support the	Actioned	Complete

<p>principle that there is <i>'usually ample opportunity for cyclists and other park users to benefit from the development of Cycling Greenway schemes that include improvements to urban public spaces'</i>.</p>		
<p>However London Wildlife Trust could not support the 2<sup>nd</sup> sentence of this paragraph. We would instead recommend that sensitive ecosystems of high conservation value (e.g. priority species and habitats) should not be further disturbed by introduction of cycling greenways, unless the design of a new greenway aimed to reduce the current level of disturbance. In some cases, the potential impact on an ecosystem might not be solved by careful design, and an alternative location for the greenway should be sought.</p>	Actioned	Complete
<p>Section 3 Policy Framework and Context</p> <p>The Trust recommends that reference should also be made to the Mayors Biodiversity Strategy – which identifies all London’s rivers and canals as Sites of Metropolitan Importance for</p> <p>Nature conservation, with associated policy in the London Plan and Biodiversity Strategy – including the policy relating to London’s Blue Ribbon Network. This particular reference to London’s rivers and waterways is relevant when considering that the key routes identified for further</p>	Actioned	Complete

investigation and upgrade are all river / canal corridors.

*Extract from London Plan*

*Policy 4C.3 The natural value of the Blue Ribbon Network*

*The Mayor will, and boroughs should, protect and enhance the biodiversity of the Blue Ribbon Network by:*

- *resisting development that results in a net loss of biodiversity*
- *designing new waterside developments in ways that increase habitat value*
- *allowing development into the water space only where it serves a water-dependent purpose or is a truly exceptional case which adds to London's world city status*
- *taking opportunities to open culverts, naturalise river channels*

*Policy 4C.4 Natural landscape*

*The Mayor will, and boroughs should, recognise the Blue Ribbon Network as contributing to the open space network of London. Where appropriate natural landscapes should be protected and enhanced. As part of Open Space Strategies, boroughs should identify potential opportunities alongside waterways for the creation and enhancement of open spaces*

Section 4.9  London Wildlife Trust recommends that a London-wide organization that can recognize and translate the environmental issues associated with the implementation plan is included in the Cycling Greenways Forum.	Referred	EqlA Action 6.1.1
Section 7.3 selection criteria  London Wildlife Trust recommends that to reflect the importance of the environment in the implementation of cycling greenways (para 1.9), there should be an additional criteria in selection process to ensure no net loss of biodiversity in schemes.	Actioned	Complete

### Metropolitan Police

**Name:** Kathleen Aubeelack  
**Organisation:** Metropolitan Police  
**Format:** Email  
**Date received:** 9 June 2006

Consultation Reponse	TFL comments and response	Status (Nov 2008)
i am aware that all locations will be different and attract a variety of users.  In North Kensington we have suffered high number of stolen mopeds. Once stolen they are ridden at speed on	Considered: TfL are aware of this problem.	Complete

<p>disused areas ie Gas works site, Canal Towpath and Meanwhile gardens towards the Scrubbs and Shepherds Bush area.</p> <p>They are aware that patrolling vehicles and those Police on foot would be unable to chase them down the towpath. Once the moped runs out of petrol it is then dumped in Canal, burnt out, or stripped for parts and another is stolen to replace it.</p> <p>It was necessary at the time to do something to reduce the length of freeway on the North Kensington Towpath in a hope of deterring them using the area. A serious accident was waiting to happen. The Police are not receiving the volume of complaints that were previously received.</p>		
<p>Regular consultation with local residents. Each borough has a CPDA and CPO which would be happy to consult with specific issues. Paul Anstee <a href="mailto:Anstee.Paul@met.police.uk">Anstee.Paul@met.police.uk</a> coordinates these officers.</p>	Actioned	Complete
<p>Issues that are regularly discussed in Kensington are mopeds and cyclists who cycle at speed with no regard for pedestrians.</p>	Action: Behaviour issues are being addressed	Ongoing
<p>On the towpath it appears that cyclists have the right of way as pedestrians have to step out of the way to let</p>	Referred	EqIA Action 5.1

them pass. Increased width will help this matter.		
Dog fouling is another problem on towpath. She suggests combining an initiative to tackle this with the implementation with the opening of new routes.	Considered: Not specifically relevant to this document.	Complete
Good manners policy is needed.	Referred	EqIA Action 6.3
Good signage in heavily used areas needs to be visible.	Referred	EqIA Action 5.1
Lighting – agree a well lit route helps to reduce crime. In RBKC they have changed from yellow sodium lights to white and this has improved the situation. However on the reverse it provides a light area for people to congregate to chat/drink etc	Considered	Complete
Suggest researching lights that capture energy from daylight to reduce running and maintenance costs. Landowners do not want to be burdened with these costs.	Actioned: Environmentally friendly lighting sources suggested	Complete
Introduction of drink free zones should help to reduce anti-social behaviour in parks/on towpaths e.g. Golbourne Ward which covers part of Grand Union Canal.	Considered	Complete
Maintenance is an important issue. Landowners tend to reduce the amount they do and the sites are unkempt, overgrown, graffiti for long periods	Considered	Complete
Bollards – each site is different with specific issues. Contact CPO or CPDA to discuss problems. Ideally they	Considered	Complete

would be obstruction free.		
Staggered 'S' barriers slow cyclists at pinch points/blind corners and hopefully frustrate motorcyclists to deter them from using the open space.	Referred: We accept that barriers are required in some instances	EqIA Action 5.1
Police partnership – local police need to be contacted for new initiatives. They are unable to guarantee they can police the open space as they are customer led.	Referred	EqIA Action 6.2

### Ramblers

**Name:** Derek Purcell  
**Organisation:** Ramblers – Inner London Area  
**Format:** Letter  
**Date received:** 26 May 2006

<b>Consultation Reponse</b>	<b>TFL comments and response</b>	<b>Status (Nov 2008)</b>
Short timeframe	Considered	Complete
TfL keeps its cycling and walking in separate compartments, adv/disadv of walkers not considered fully	Actioned Relevant paragraph reviewed, re: adv/disadv	Complete
Suggest clamp down on illegal/dangerous cycling on and off-road. Unfair to promote new routes until this behaviour is tackled.	Referred	EqIA Action 6.3

<p>No recognition of advice in Local Traffic Note 2/86 and LTN 2/04 that encroachment of cycle facilities on previously pedestrian paths should be last resort.</p>	<p>Actioned: Referred to guidance, although don't agree 'last resort' comment. Some facilities will be separate, others this will not be possible</p>	<p>Complete</p>
<p>Green spaces and towpaths are essentially leisure environments. Mentioning original use of the towpath for transport uses is red herring.</p>	<p>Considered</p>	<p>Complete</p>
<p>No recognition of difference between leisure and commuter cycling.</p>	<p>Considered: Plan to make routes for enjoyment by all</p>	<p>Complete</p>
<p>Terminology of 'shared-use' – whether shared-use is unsegregated, or segregated adjacent use (dual-use through use of white lines) which is preferred.</p>	<p>Considered: 'Ideal' is segregated, but will depend on situation.  Actioned: Outline distinction between 'shared' and 'dual use' terminology</p>	<p>Complete</p>
<p>Wheelchair users benefit from facilities provided by cycle schemes, but consider this is outweighed by the degradation to their environment which then discourages their use.</p>	<p>Considered: Do not consider that an environment that can be enjoyed by all as degradation of environment. Promotion required to ensure people are not discouraged from using this space.</p>	<p>Complete</p>
<p>Considers off-road facilities increase crime due to easier, speedier getaways.</p>	<p>Considered: note that increase in people present may reduce actual crime</p>	<p>Ongoing</p>

Para 1.10 use of Kensington Gardens and Europe (different cycling culture) as addressing concerns for mixed use. Statistical representation also questioned.	Actioned	Complete
CTC 2000 'Cyclists and Pedestrians – attitudes to shared use facilities'. General view reported is that shared facilities are disliked (unsafe/unattractive), but accepted primarily due to altruism. Belief that shared use represses trips for some groups such as blind, children, confused elderly etc	Referred	EqIA Action 5.1
Mainland Europe is not considered to be a valid comparator different cycling culture and behaviour (ordinary clothing, no helmet, slower speeds)	Considered: This is what we are working towards.	Complete

**Name:** Des De Moor  
**Organisation:** Ramblers – Inner London Area  
**Format:** Letter  
**Date received:** 26 May 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
Walking Groups to be represented on the Cycling Greenways Forum	Considered	EqIA Action 6.1.1 EqIA Action 6.2
Walking proposals should be strengthened i.e. wherever	Actioned	Complete

cycling benefits are discussed e.g. 1.8, section 2, 4.5.		
Walkers needs should be specifically tackled e.g. section 9 – fear of crime may be more of an issue for walkers than cyclists	Actioned	Complete
Signing needs to reflect needs of walkers i.e. clearly signed for shared use and to encourage considerate behaviour by cyclists.	Referred	EqIA Action 5.1
Signage for walkers varies to cyclists – their speeds are lower and therefore they may require more signs for the same distance and there may be more direct links for walkers that may be off-limits to cyclists. Different strategies will therefore be required.	Referred	EqIA Action 5.1
Mapping strategies for walking and cycling routes needs to take account of different needs and aim to be consistent in signing such as Legible London.	Referred	EqIA Action 6.4
Branding - suggests promoting these routes as Greenways or as Active Travel Greenways. This should also apply to NCN and LCN+ linking network.	Referred	EqIA Action 6.4
Context – off-road routes offer many attractions/advantages to non-motorised users. Suggests there is a danger that by promoting them in isolation sends a message that non-motorised users don't 'belong' on the public highway. Any work carried out on off-road	Actioned	Complete

routes should not detract from the need to improve the on-street environment for active modes.		
Potential conflict – many peds, particularly vulnerable users such as elderly, disabled, people with young children, find fast inconsiderate cycling undermines their safety and deters them from making walking trips. This is reinforced where cyclists cycle illegally, also a problem where shared use paths are badly designed, implemented and maintained.	Referred	EqlA Action 5.1 EqlA Action 6.3
Where paths are 'upgraded' to include shared use with little or no infrastructure this is bound to lead to conflict and resentment with existing pedestrian users.	Referred	EqlA Action 5.1
Cycling biased statements e.g. "to improve cycling on towpaths (1.3)" does not promote confidence. Argues it should read "to improve condition of the towpaths for both walkers and cyclists and to accommodate the needs of both groups".	Considered	Complete

<p>To avoid potential conflict and deterrence of walking trips the following elements are vital:</p> <ol style="list-style-type: none"> <li>1. Full consultation with relevant stakeholders including walking and pedestrian groups</li> <li>2. Highest possible design and implementation standards</li> <li>3. Highest possible standards of ongoing maintenance e.g. cutting back vegetation to maintain widths,</li> <li>4. User education and encouragement of courtesy and consideration. Widely promoted easy to understand codes of practice that could be displayed at key access points to the route.</li> </ol>	<p>Referred</p> <p>Actioned: Done and should be undertaken at design/pre-implementation stage</p>	<p>EqIA Action 5.1</p>
<p>If routes simply promoted as 'cycle routes' some cyclists are encouraged to feel that the infrastructure is primarily for them and are more likely to see walkers as an unwarranted, unwelcome intrusion.</p>	<p>Referred</p>	<p>EqIA Action 5.1</p> <p>EqIA Action 6.3</p>
<p>Success of shared use depends to some extent on relatively low levels of cycling. The rising levels to which London aspires needs to be planned for. Ongoing monitoring of use and allowance for revisions to the schemes should cycle use exceed expectations, this needs to be planned into the process.</p>	<p>Referred</p>	<p>EqIA Action 7.1</p> <p>EqIA Action 8.1</p>
<p>Maintenance – section needs to be strengthened. A poorly maintained route, with indicators of neglect</p>	<p>Actioned</p>	<p>Complete</p>

(vandalised signing, crumbling surface, overgrowth) may be viewed as hostile, unsafe environment. Also indicates that this form of transport is second class and low status. Maintenance plans must be built from the start and adhered to.		
9.16 could be extended to include litter and especially fly tipping	Actioned	Complete
User education – section 9 needs to include reference to programmes of user education around courtesy and etiquette on shared use routes to encourage cyclists to have consideration for other vulnerable users.	Actioned: Included that there is some education for walkers on dual use facilities.	Complete

## Royal Parks

**Name:** Mark Camley  
**Organisation:** Royal Parks – Inner London Area  
**Format:** Letter  
**Date received:** 17 May 2006

<b>Consultation Response</b>	<b>TFL comments and response</b>	<b>Status (Nov 2008)</b>
Source of 2.2 - Kensington Gardens work – RP still receive complaints	Considered	Complete
Do the LCN+ or NCN include any TRP routes?	Considered: LCN+ generally on road through parks, NCN does include some	Complete

	routes through Parks	
Figs in 7.1 – assume contribution from TRP?	Actioned	Complete
Para 7.3 time savings should come later in the paragraph	Actioned	Complete
9.11 there are still some detractors	Considered	Complete
Gaps in info e.g. p5	Actioned	Complete
Include MPS as stakeholder	Actioned	Complete

### Walk London

**Name:** Gary Cliffe  
**Organisation:** Walk London  
**Format:** Email  
**Date received:** 1 June 2006

<b>Consultation Response</b>	<b>TFL comments and response</b>	<b>Status (Nov 2008)</b>
Basic position is that the walking experience shouldn't be compromised.	Actioned	Complete
Where new shared use paths are considered, they must be wide enough (ideally segregated) so as not to ruin experience for walkers.	Referred	EqIA Action 5.1
Preference for segregated facilities e.g. by landscaped strip. Thames Path Cycling Policy is for a 3m shared use	Referred	EqIA Action 5.1

facility, 2m at the absolute minimum,		
Where routes are next to water, suggests locating walkers next to the water	Referred  Considered: Contradicts other policies and generally due to limited side by canals etc often these are shared use	EqlA Action 5.1
Many proposed routes are existing routes and perhaps should be termed Greenways rather than Cycling Greenways	Actioned: Greenways is the acknowledged term when referring to off-highway routes. COG is the name of the TFL CWA investment programme.	Complete

**Name:** Jim Walker  
**Organisation:** Walk London  
**Format:** Email  
**Date received:** 6 June 2006

<b>Consultation Response</b>	<b>TFL comments and response</b>	<b>Status (Nov 2008)</b>
Overall I think the document reads well and is clear in its policy setting and the relationship between existing TfL and borough programmes, tools and maintenance commitments. I am genuinely concerned however that there is very little recognition anywhere that the Cycling Greenways are in fact all existing walking routes to which this strategy is suggesting 'adding' and or developing	Referred	EqlA Action 5.1

<p>cycling. By this I don't automatically assume that there will be a conflict and indeed the design minimum (?!) standards in 8.14 are reassuring that 'best practice will minimise this but it is misleading not to mention it and to spend 90% of the document only talking about cycling when ALL the routes will also be walked.</p>		
<p>My other overview comment is that the document appears to take a rather disappointing 'old school' approach to identifying routes and networks with out any real talk about understanding existing and potential demand, motivations and behaviour. I do think that the document would significantly benefit from a chapter at least recognising that this network is for people - waiting until section 7.3 on page 23 (Of 39) to mention 'flows' as part of the selection criteria seems a bit late.</p>	<p>Referred</p>	<p>EqIA Action 3.3</p>
<p>1.7 – acknowledge that these routes are ALL (?) existing walking routes – what percentage are also already also cycling routes?</p>	<p>Referred</p>	<p>EqIA Action 3.3</p>
<p>1.8 is there an opportunity for walkers in this initiative as well as cyclists? – improved, safety, quality etc ?</p>	<p>Actioned</p>	<p>Ongoing</p>
<p>1.9 - need to recognise relationship with walking in this criteria and make sure the box of 'principles' relates to the criteria on page 23.</p>	<p>Actioned</p>	<p>Complete</p>

1.10 - It would be useful to note here that (as is recognised later in the document e,g 2.10) the potential 'conflict' between walkers and cyclists is not just measured about collisions but actually about perceived risk too.	Referred	EqIA Action 5.1
1.12– would be nice to see a supportive objective that is to not reduce the quality of experience for walkers or even better to enhance the walking experience as well as the cycling one with this initiative!!	Actioned	Complete
1.15 – would be nice to have some targets for walking as well as cycling on these greenways if you were too acknowledge that walking already happens and that it should be a desire to encourage more (inline with other strategies)	Referred	EqIA Action 8.1
2.4 – would be useful to know what 'research' - link seems to have become lost.	Considered	Complete
2.11 – yes, would be useful to quantify capacity or talk about demand here if not before	Actioned	Complete
4.5 – Would be great to extend the purpose of the Forum to promote access for WALKERS and Cyclists to parks and green spaces, its in the second objective but missed off in the aim!	Actioned:: COG Forum broadened to include representation from walking and cycling.	Complete

<p>4.9 – forgive me but I’m not sure which pedestrian groups are represented on the Forum (I’m not aware of any) and bearing in mind that ‘wheel chair users’ are identified in the second objective (and not other disabilities???)  isn’t it an oversight not to include representatives on the Forum too??</p>	<p>Actioned:: COG Forum broadened to include wider representation.</p>	<p>Complete</p>
<p>4.10 – again would be useful to spell out who the ‘other stakeholders’ actually are in an appendix and their contact details! (Seems an oversight not to include the Countryside Agency on the list of agencies – they wrote and manage the national best practice guide to greenways! (that I wrote for them 3 years ago!!)</p>	<p>Actioned: CA included in the last bullet</p>	<p>Complete</p>
<p>4.11 – Good to hear about CRISP but please be aware that I don’t know exactly what this is, what it measures or how it works (would be useful to spell out here or refer to the later explanations) – fingers crossed it evaluates the impact on walking too in any evaluation framework???...otherwise dare we ask for a ‘Walkers CRISP’ to supplement the existing assessment tool?!</p>	<p>Referred   Actioned: Advice sought from walking team. CRISP is related to implementation of cycle schemes only. Green CRISP has been developed.</p>	<p>EqIA Action 4.1</p>
<p>5.20 – great to see measurable outcomes detailed here (if only as suggestions) – would be good to strengthen these – agree a common formula for how they will be measured (before and after etc) and ensure they link with the objectives so that they are a true measure of success (i.e. objectives are about number of strategies, reducing</p>	<p>Referred</p>	<p>EqIA Action 8.1</p>

barriers, crime reduction, conflict resolution, best practice and coordination – how are these being measured in the current list of record keeping databases – they don't seem to be??)		
5.21 – would be useful to acknowledge if not commit to the use of a Health Impact Assessment in this list (will help with match funding possibly and links with PCTs etc)	Considered	Complete
7.3 – Criteria – This is a great list but seem unrelated to the aim and objectives defined earlier and unrelated again to the monitoring criteria given later! – These all need bedding together much more! – it would be useful to be more definite about this list and to rank their priority as a minimum - ie is time saving for instance really the most important feature when you acknowledge earlier on in the document that its environmental quality that makes them unique and the fact the routes will be used to gain confidence for novice cyclists – (neither prioritise speed or time).	Considered: Criteria is for selection/prioritisation of schemes. Criteria not in order, but this will be addressed through previous comments.	Complete
Flows (see comment above) - but are we recording walking and cycling?	Considered: If remove word 'cycling' encompasses all users	Complete
Connectivity – what about walking and wheel chairs here as per the objectives – need to get a consistent vocabulary.	Actioned: Revised to mention 'cycling and walking routes' e.g. Thames Path	Complete

Why pick on journeys to work and school – what about other short trips? – needs expanding	Actioned: Removed ‘to work or school’ and replaced with ‘by bicycle or foot’	Complete
Social exclusion - great to have this here but why not in the objectives too? – how will the scheme practically address this and measure it to be more than a throw away line?	Referred  Actioned: Included in objectives – spaces for all to enjoy	EqIA Action 8.1
Types and classes of user – what does this mean?	Actioned: Removed to read ‘will the improvements benefits all users’	Complete
Tourism, economic, regeneration – can this be defined better and how will it be measured?	Considered	Complete
Mobility problem needs – what about other abilities and mental incapacity etc? (needs a better language here.	Actioned: Text expanded to include other disabled groups	Complete
‘Is any adverse impact on other users acceptable?’ – cant think when on earth this would be the case! – needs explaining !!	Actioned: bullet removed	Complete
Value for money – great, but there needs to be a consistent formula for calculating this which isn’t clear.	Considered: There is no formula – it is not about one scheme being cheaper than another. A number of factors apply and this will be discretion of TfL Greenways Programme Manager	Complete
7.4 – Key Routes – Not sure how this list has come about – is it because they exist or because they connect against	Referred  These are schemes that have been	EqIA Action 3.1

<p>the criteria given previously (and if so would be good to demonstrate how they score against it as exemplars!) and or is the list based on where there is a demand? ideally all 3? – Where are the gaps in the network if this is the core? – is it up to the Boroughs to find them or can you tell them?</p>	<p>funded by TfL for several years prior to criteria and establishment of Greenways Programme.</p>	
<p>7.11 – would be great to see where these routes are and to know more about them in relation to the CRISP criteria, the Criteria given in 7.3 and or the objectives of the whole project! – how are the benefits on each one being measured, what have been the costs and what return have they given ? (if these are the key monitoring tools)</p>	<p>Referred</p>	<p>EqIA Action 3.1 EqIA Action 4.2 EqIA Action 8.1</p>
<p>7.12 – Delivery programme seems heavily network led rather than demand led – would be good to build people into the process and to show how the Forum fit in to the actions!</p>	<p>Considered - Disagree, given the location of potential greenways a cohesive network is not possible, hence is demand-led.</p>	<p>Complete</p>
<p>8.3 – Like the 7 points outlining CRISP (better late than never) but they do mention local need assessment and addressing on and off route access (for the first time) which should surely be woven into criteria, objectives etc earlier?</p>	<p>Considered</p>	<p>Complete</p>
<p>8.11 – interesting to see how CRISP qualifies if a path is ‘DDA Compliant’ as the act talks about taking ‘reasonable action’ – its different from building assessment.</p>	<p>Considered: The legal status work is evaluating current access points including DDA. This then feeds into the</p>	<p>Complete</p>

	CRISP process.	
8.14 – Good to see design standards best practice. DFT guidance suggest segregation is best – should this not be acknowledged too or at least referred too? – What happens when the minimum isn't possible? (I've just been asked to look at the Regents Canal to come up with recommendations for some points of conflict – but have rejected the job as the surface, canal and bridges can not be altered in anyway due to underground cables, heritage values and minimum canal width- would be useful to acknowledge that this is a real problem and that there aren't necessarily any solutions! (or are there?)	Referred	EqIA Action 5.1
8.25 – steps are a barrier for walkers too and those with mobility difficulties! (not just cyclists)	Referred	EqIA Action 5.1
9.25 – good to hear about the Wandle signage – does it sign for walkers too and is it distance or time based signs?	Considered	Complete
9.6 and walkers?!	Considered	Complete
9.11 – may be useful to refer to University of Surrey research on conflict and the 'Share with Care' scheme I developed with the Agency in the 90's?	Considered	Complete
10.2 – this feels disjointed from the other criteria, objectives, CRISP formulas etc – maybe im not familiar enough with it but id like to see stronger links between	Actioned	Complete

setting out what it is we want these routes to achieve, defining how we get there and knowing when we have by recording set criteria for success!		
10.5 – and walking?!! (and wheel chairs?)	Actioned	Complete
10.6 - how does this relate to 5.20 and 5.21? – flow needs to be qualitative and qualitative – needs more links in the document again.	Actioned	Complete
11.10 – strange that it is only in the 3rd from last paragraph that it identifies ‘two key issues for which management strategies will be required’ – where are these mentioned so specifically in the previous text? And why are they not specifically in the action plan if they are so key?	Considered: Action Plan relates to the management of the Greenways Programme rather than individual schemes. There are two key management strategies earlier in the report.	Complete

## Sustrans

**Name:** Carl Pittam  
**Organisation:** Sustrans - Regional Director for London  
**Format:** Email  
**Date received:** 2 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
Broadly, an excellent document that we would very strongly support	Considered	Complete

<p>The name "Green Cycle Corridors" was changed to "Greenways" recently. I had understood that this was in response to a comment made by Sustrans, namely that these routes are not only for cyclists. The name "Cycling Greenways" seems to put us back where we were. Please can we use just "Greenways" and then clearly define users, as you have in sections 1.7 to 1.11?</p>	<p>Considered: Ongoing debate</p>	<p>Ongoing</p>
<p>Point 6.2 - The Wandle Trail is currently in the process of being re-numbered to National Route 20. Please can we mention this? I can update you on timescales if you need them.</p>	<p>Actioned: Text updated to indicate former and current number</p>	<p>Complete</p>
<p>Point 7.8 - please can we ensure any numbering is co-ordinated with the existing Sustrans system which is used right across the UK? This is not only the route numbers that are publicly promoted, but also a system of dividing and labelling routes. It would help with continuity and also with GIS. Our mapping uses this system already.</p>	<p>Actioned: Re co-ordination to NCN/ avoidance of using same numbering as LCN</p>	<p>Complete</p>

### Transport 2000

**Name:** Richard Bourn  
**Organisation:** Transport 2000  
**Format:** Email  
**Date received:** 15 June 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
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<p>Transport 2000 is happy to be cited as a keen supporter of the provision of Cycling Greenways. It is a valuable project and one which we would like to see receive increased funding to enable faster and more widespread implementation.</p>	<p>Considered</p>	<p>Complete</p>
<p>We are particularly pleased that the Greenways concept involves shared use by pedestrians and cyclists. Shared facilities are commonplace elsewhere in Europe, and indeed in the UK, and concerns that they are somehow unsatisfactory for pedestrians are misplaced. Greater experience of shared facilities will show that they work well.</p>	<p>Considered</p>	<p>Complete</p>
<p>Transport 2000 would hope to see a particular emphasis on the provision of greenways as a means of access to the Olympics and as a legacy from the games. We believe there is scope for the number and extent of Greenways in the Olympic areas to be increased especially where the provision of Olympic facilities is included in large scale regeneration and redevelopment. In fact it would be remiss if the opportunity afforded by the Olympics substantially to improve pedestrian and cyclist facilities were to be wasted.</p>	<p>Considered: Progress is being made on Greenway access to the Olympics</p>	<p>Complete</p>

## Further comments received 2007-2008

### Sustrans

**Name:** Carl Pittam  
**Organisation:** Sustrans - Regional Director for London  
**Format:** Email  
**Date received:** 21 November 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
1.8 (page 3). We suggest that the 'default' meaning of 'Greenways' should be shared use routes , in accordance with the Countryside Agency definition . In the text, we suggest that “..to distinguish them from other Greenways where it is not appropriate to permit cycling” is changed to “..to distinguish them from other <b>paths</b> where it is not appropriate to permit cycling”	Referred	EqIA Action 5.1
1.10 (page 3). We suggest that this paragraph makes it clear that whilst the local environment is a high priority, it is important that a balance is struck which takes into account the wider environment (i.e. the carbon reduction potential of encouraging more cycling) and the other benefits – such as health. We have faced opposition by local parks groups wanting to protect the [local] environment without thinking more widely.	Actioned	Complete
Shared-use Greenways (box at the top of Page 4 ). We suggest that the second bullet is expanded to include, 'or busier roads with good quality cycle facilities (ideally	Actioned	Complete

<p>segregated from the traffic) that maintain the same, or similar, levels of safety and appeal.’ This is an important element to provide route continuity and to work towards an integrated network or routes.</p>		
<p>6.2 (page 20). On the 4th line of this paragraph, ‘22’ should be ‘20’.</p>	Actioned	Complete
<p>Section 7. Whilst this includes a map showing ‘Key existing shared-use Greenway routes’, there appears to be no intention to include a map of the wider (proposed) Greenways network. We suggest that this would be a valuable inclusion, as it would give an indication of the intended scope of the network.</p>	Referred	EqIA Action 3.1
<p>Section 8. Little mention is made of the importance of links and connections in the delivery of Greenways. This should be considered a vital consideration in Greenway implementation.</p>	Actioned	Complete
<p>8.24 (page 35). We suggest that there would be value in expanding this section. Tricycles and disabled electric buggies are some of the most difficult to negotiate around barriers and these should be mentioned, particularly important as some people to walk very far are in fact able to travel by bike relatively easily. The section could also be made more prescriptive. For instance, we suggest that certain types of barriers should be stated as unacceptable in any circumstances, such as the kissing-gate barrier photographed. We feel there is lack of strong guidance on this issue that is causing indecision and confusion locally.</p>	Referred	EqIA Action 5.1

## City of London

**Name:** Jennifer Adams  
**Organisation:** City of London - Director of Open Spaces  
**Format:** Email  
**Date received:** 3 November 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
I have no problems with the signs however as I said at the meeting whether they can be used will depend on individual sites and circumstances. They might be deemed too intrusive on more natural sites.	Referred: will need to be assessed as part of CRIM/CRISP process	EqIA Action 4.2

## British Waterways

**Name:** Louise Fishleigh  
**Organisation:** British Waterways London - Recreation Manager  
**Format:** Email  
**Date received:** 20 November 2006

Consultation Response	TFL comments and response	Status (Nov 2008)
<p>I have consulted a variety of people within BW about the shared use signs.</p> <p>We are all in agreement that the sign on the right (large pedestrian with small bike underneath) is better for use by BW.</p> <p>There were varying views about the colours but I think we all agreed that the green is rather horrible but at least it</p>	Referred	EqIA Action 5.1

<p>would be eye catching. Perhaps a different shade of green would be more attractive.</p> <p>We would like the wording to be:          'Pedestrians have priority.'          'Considerate cycling permitted.'</p>		
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### Living Streets

**Name:** Simon Barnett  
**Organisation:** Living Streets - Regional Director for London  
**Format:** Notes taken in meeting  
**Date received:** 9 February 2007

Consultation Response	TFL comments and response	Status (Nov 2008)
Section 8 needs to be split into 2 sections – new and upgraded (p32)	Considered	Complete
Counting pedestrians needs to be emphasised	Referred	EqIA Action 8.1
General revision of terminology to reflect walking as well as cycling	Actioned	Complete
Favouritism towards cycling	Considered	Complete

## COG EqIA Comments

### City of London

**Name:** Tony Leach  
**Organisation:** City of London  
**Format:** Email  
**Date received:** 18 January 2008

Consultation Response	TFL comments and response	Status (Nov 2008)
Overall the CoGEqIA is an excellent report. The executive summary is really a summary & the report does need a proper exec summary.	Considered	Complete
The Action Plan that follows from the report can be improved by merging 3 Strategic Network with 4 Classification. You may want to consider adding Mitigation as another action.	Actioned	Complete

### TFL – Walking Programme Team

**Name:** Spencer Clark  
**Organisation:** TfL – Walking Programme Manager  
**Format:** Email  
**Date received:** 24 December 2007

Author note: Some thoughts on the EQIA report. Overall, I think it's a fair and balanced report that covers all the main ground and provides an honest and open perspective of the issues from the cycling, walking and disabled user perspective. As such, only a couple of minor comments.

Consultation Response	TFL comments and response	Status (Nov 2008)
<p>Although the report presents all arguments from both sides fairly, some of the pics are very cycling centric, might be an idea to fit in one or two more of ped or disabled users. Linked to this, is the picture on page 21 OK - it looks like a segregated route where cyclists are on both sides?</p>	Actioned	Complete
<p>The points made in section 4.3 are noted and welcome from a pedestrian angle and help to rebalance the perceived cycling focus that has come across from earlier CoG publications.</p>	Considered	Complete
<p>Section 7.2.3 refers to standards and reference for access, would it be worth noting the use of 'Inclusive Mobility' here, as published by the DfT that our team uses as our equivalent of LCDS?</p>	Actioned	Complete
<p>Section 7.3 (p31) is I think the biggest hurdle in some ways to a successful CoG programme from both sides. Although the report mentions this and some mediating measures, I don't think it has got this aspect 'nailed' down as yet. Measures to tackle the behaviour and respect aspect need more investigation and a stronger action plan.</p>	Referred	EqIA Action 6.3
<p>P47 mentions signage on the CoG routes. As our team is developing Legible London, I think a written reference to this project and it's design principles is required so that</p>	Actioned	Complete

even if the signs are not physical LL ones, the principles and information is similar and linked.		
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### Capita Symond

**Name:** Peter Mynors  
**Organisation:** Capita Symonds – editorial consultant for COGIP  
**Format:** Email  
**Date received:** 2 December 2007

These notes have been prepared on the basis of a single reading of the EW report and should be read in that light.

Consultation Response	TFL comments and response	Status (Nov 2008)
Page 5 line 1 – date required.	Actioned	Complete
Page 5 3 <sup>rd</sup> paragraph last line, and elsewhere – all references should be to the <u>draft</u> CoGIP (for the avoidance of doubt, the first reference should be to the 30/1/07 draft).	Actioned	Complete
Page 7 section 2.1 – the proportion of people aged over 65 will increase, but this may not be relevant if people stay sprightly longer. Longer life spans would appear to be accompanied by later onset of senility, and a postponement of normal retirement to a later age than 65 is already being talked about. Has any research been done on this?	Referred	EqIA Action 6.1.1
Page 7 section 2.2 – the list of references is almost wholly UK based (only references 9 and 45 out of the list of 69 references are from outside the UK). Is this because UK is	Considered	Complete

leading the world on this topic, or because few papers are produced in English? The shared use of paths seems less of an issue when one cycles or walks in northern Europe.		
Page 18 section 4.2 last sentence – the draft CoGIP wording may reflect that in London, shared use will be the only option in a high proportion of instances.	Considered	Complete
Page 18 and 19 references to the apparent CoGIP over-emphasis on cyclists’ needs – the comments made usefully highlight the coincidence of requirement between disabled people and cyclists on a number of issues e.g. steps, nettles, removal of gates. The CoGIP text can be amended to reflect this in more places.	Actioned	Complete
Page 20 last paragraph on page – for completeness and the avoidance of doubt, mention of disabled people’s access rights needs to include explicitly the list of people given by the reference group (page 44 section 3.7). Also included explicitly should be the type of person referred to in the draft CoGIP page 10 footnote 14 (the person too fearful to cycle on a public road).	Considered	Ongoing
Page 31 section 7.3 – encouraging cyclists to wear helmets on Greenways would send a completely inappropriate message. Helmets are primarily of benefit at high speeds, such as fast commuter cycling, racing and mountain biking. This is not an image that is suitable for Greenways.	Considered	Complete
Page 33 section 7.5.2 – pedestrian and disability group representatives are already included in the draft CoGIP at	Considered	Complete

para 4.10. It could be difficult to find a single representative body that genuinely encompasses all the relevant types of vulnerable user (see 8 above), judging by the heated debate that apparently took place within the reference group.		
Page 43 classification C – proposed regulation that includes measures to make cyclists dismount. Specific mention could usefully be made of the disproportionate nuisance this causes to disabled cyclists (e.g. mobility impaired or blind stokers on tandems).	Considered	Complete
Page 43 section 3.6 – the two examples given both portray cyclists as young and/or able bodied. Some bias here?	Considered	Complete
Page 46 section 5.2 last paragraph – what evidence did the Reference Group have that pedestrians make up the majority of Greenway users? Surely this will vary from Greenway to Greenway - for example on sections of canal towpath that are some distance from an access point, there are often more cyclists than pedestrians.	Referred	EqlA Action 3.3 EqlA Action 8.1
Page 48 collated questionnaire responses last two items – these both refer to the need for regular maintenance. A crucial point arising frequently is that there is often limited width available, and that this can exacerbate any conflicts between users. It makes no sense to make a path that is already narrow even narrower as a result of overgrowing vegetation or puddles. This point may need more emphasis within CoGIP.	Considered	Complete

<p>Page 56 reference 69 – this refers to the “two tings” campaign. There is a woeful lack of decent cycle bells on the market. Two well-used catalogues (Evans Cycles as recently sent to all LCC members and the Wiggle.co.uk website) do not even list bells in their indexes, though the latter has ‘Barbie’ and ‘Dennis the Menace’ bells in the ‘Kids Stuff’ category. I shall bring samples of bells to the meeting tomorrow.</p>	Considered	Complete
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## Appendices

### Appendix 1: Letter to stakeholders inviting comments on COGIP

Date: 25 May 2006

To Whom It May Concern:

#### Document for Consultation

I tried calling to find an appropriate contact but to no avail. Please find enclosed the Draft Cycling Greenways Implementation Plan for consultation. May I emphasise that we are using the term "Cycling Greenways" as a working title at this stage.

#### Background

TfL has been funding a number of greenway schemes (shared cycling and walking schemes, to and through parks or alongside watercourses) over the past few years and has now formalised the bidding and implementation process. The Cycling Greenways Implementation Plan is intended to be a reference document providing guidance on funding, bid process including scheme selection criteria and design principles specifically for cycling initiatives, although the schemes will usually be shared-use. You may find some sections irrelevant to your specific area of expertise.

As the Cycling Greenways Programme develops, we envisage that so too will this document.

As you will see there is some data in tables and maps still awaited. Spelling and grammar will be picked up through the final proof read following this consultation. We will be seeking sign off by the (Cycling) Greenways Forum which is to be held in mid-June.

#### Timescales

Please pass back comments to me for collation by close of business Friday 9 June. Please send through comments either by email (as below), fax (020 7027 9367) or post (3rd Floor North, Parnell House, 25 Wilton Road, London, SW1V 1LW).

Your help is much appreciated. If you have any queries, please do not hesitate to contact me on 020 7027 9299 or at [nicolaread@streetmanagement.org.uk](mailto:nicolaread@streetmanagement.org.uk)

This document has been sent to borough cycling officers and a number of other organisations including walking, cycling and disability groups.

Yours sincerely

Nicola Read

Cycle Programme Officer

## Appendix 2: Cycling on Greenways EqlA Action Plan

<b>1</b>	<b>ESTABLISH A VISION</b> <i>Define and adopt a long-term vision for Cycling on Greenways</i>	<b>Partners</b>	<b>Target</b>
<b>1.1</b>	<b>Publish CoG EqlA</b>	TfL E&I, Equality Works	Jan 2008
<b>1.2</b>	<b>Publish CoG EqlA Action Plan</b>	CoG Forum	Apr 2008
<b>1.3</b>	<b>Publish CoGIP</b>  Produce and publish a revised CoGIP (CoGIP2) reflecting EqlA recommendations and perhaps being formed of two documents – a public-facing document ‘selling’ the CoG objectives and goals of CoG and a second the Programme delivery Plan.		Dec 2008
<b>1.4</b>	<b>Invest in a Network</b> <i>(see also action 3)</i>	Various	Ongoing

<b>2</b>	<b>CONSULT AND LEARN</b> <i>Embed consultation at all stages of scheme development</i>	<b>Partners</b>	<b>Target</b>
<b>2.1</b>	<b>Stage 1: Strategy and Programme</b> <i>(see also action 3)</i>  Consult the developing strategic CoG network and maintain and develop links through the CoG Forum.	WAP, CoG Forum,  Highway Authorities  Managing Authorities	Ongoing
<b>2.2</b>	<b>Stage 2: Routes</b>  Use and seek continuous improvement of the Green CRISP (see action 4)	Commissioning Bodies  Consultants	Ongoing
<b>2.3</b>	<b>Stage 3: Schemes (Before)</b>  Funding recipients to provide delivery assurance plan	Funding Recipients	2008/09 onwards
<b>2.4</b>	<b>Stage 4: Schemes (After)</b>  Implement an effective outcome monitoring	Funding Recipients	2008/09 onwards

	programme and gauge effectiveness of interventions (see action 8)		
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<b>3</b>	<b>INVEST IN A NETWORK</b> <i>Formalise and plan CoG investment across London</i>	<b>Partners</b>	<b>Date</b>
<b>3.1</b>	<b>Identify a network of Greenways for programmed investment</b>  Make use of existing studies, methodologies, initiatives, and walking & cycling networks	Managing Authorities Sustrans, CPU, DfL  CoG Forum	Mar 2009
<b>3.2</b>	<b>Determine the feasibility / benefit of using a classification system for Greenways</b>	TBC	TBC
<b>3.3</b>	<b>Quantify current and potential network user demand</b>	TBC	TBC
<b>3.4</b>	<b>Provide parallel routes where appropriate</b>	Highway Authorities	Ongoing

<b>4</b>	<b>IMPROVE THE GREEN CRISP</b> <i>Formalise use of and seek improvements to the Green CRISP</i>	<b>Partners</b>	<b>Target</b>
<b>4.1</b>	<b>Equalities audit the Green CRISP brief and process</b>  Commission an EqIA-style equalities audit of the current Green CRISP brief		Summer 2008
<b>4.2</b>	<b>Review lessons from previous Green CRISPs</b>  Review past Green CRISPs for lessons learned and suggestions for improvement.	Commissioning Bodies  Consultants	Summer 2008
<b>4.3</b>	<b>Mandate use of the Green CRISP on all routes in the network</b>		Apr 2008

<b>5</b>	<b>PROVIDE GUIDANCE</b>	<b>Partners</b>	<b>Target</b>
<b>5.1</b>	<b>Publish TfL Greenways design guidance</b>	TBC	Dec 2008

	Collate existing guidance and commission work to fill any gaps		
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<b>6</b>	<b>MARKET AND PROMOTE</b>	<b>Partners</b>	<b>Target</b>
	<i>Publicise the who, what, when, why and how of Greenways</i>		
<b>6.1</b>	<b>Formalise and improve the way CoG is communicated</b>  1. Produce a stakeholder map  2. Produce and implement a communications strategy	CoG Forum  Active Travel Development	1. Summer 08  2. Mar 09
<b>6.2</b>	<b>Seek synergies with other TfL strategies and programmes</b>	Various	Ongoing
<b>6.3</b>	<b>Promote appropriate behaviour on Greenways</b>  Promote a code-of-conduct for use on Greenways, using and building on existing.	British Waterways  The Royal Parks  Other Authorities  TfL Comms/Marketing	Ongoing
<b>6.4</b>	<b>Publicise Greenways schemes as they are built</b>	TfL Comms/Marketing	Ongoing

<b>7</b>	<b>MANAGE &amp; OPERATE</b>	<b>Partners</b>	<b>When</b>
<b>7.1</b>	<b>Identify and use positive enforcement to promote considerate behaviour</b>  Identify and seek involvement of local groups and organisations	CoG Forum  Campaign Groups  Managing Authorities  Highway Authorities	Ongoing

<b>8</b>	<b>MONITOR &amp; REVIEW</b>	<b>Partners</b>	<b>When</b>
<b>8.1</b>	<b>Include equality indicators in scheme monitoring</b>	TBC	2007/08 schemes

	Will include seeking advice from TfL E&I on type of data / information to capture  Include measurement against Greenways capacity indicators		onwards
<b>8.2</b>	<b>Decide monitoring and review regime for CoG EqIA Action Plan</b>	TfL E&I	TBC

<b>9</b>	<b>PROPORTIONALITY</b>	<b>Partners</b>	<b>When</b>
<b>9.1</b>	<b>Assess impacts and benefits of proportionality on Greenways</b>  Implement actions accordingly	TBC	TBC

**Key to partners:**

TfL E&I = TfL Equality & Inclusion

DfL = Design for London

CPU = Commissioner's Policy Unit

Managing Authorities = Boroughs + other managing authorities of green and open spaces

## References

### **Reference 1**

Cycling on Greenways Implementation Plan Consultation draft  
28 April 2006

### **Reference 2**

Cycling on Greenways Implementation Plan draft reflecting consultation  
30 January 2007

### **Reference 3**

Cycling on Greenways Equality Impact Assessment Report  
23 November 2007

### **Reference 4**

Cycling on Greenways Forum, Terms of Reference