6.30 The Council recognises the role coach services can play within the framework of an integrated transport policy. Where developments are likely to generate a need for coach parking the Council seeks to secure off-street coach parking or setting down and picking up facilities. Where this is not achievable on-street facilities or Section 106 funds could be sought. It is also part of this policy to examine existing coach attractions in the borough to enhance accessibility and facilities.

THE ROAD NETWORK AND TRAFFIC RESTRAINT

6.31 Strategic Guidance for London Planning Authorities 1996 requires the Borough's road hierarchy to be developed in relation to the London Road Hierarchy and to be classified into Strategic Routes, London Distributor Roads and Local Distributor and Access Roads.

6.32 The Council's road hierarchy was defined in the Unitary Development Plan 1996. The purpose of the hierarchy is to help guide longer distance movements to appropriate parts of the road network, and to assist in the reduction and regulation of through traffic to protect residential and other sensitive areas from traffic intrusion. It will be used in the development of measures to reduce vehicle traffic, to improve air quality in line with the Environment Act 1995, and to meet the requirements of the Traffic Reduction Act 1997.

6.33 The Borough road network is shown on Fig 6.2 and on the Proposals Map. The hierarchy of roads and their intended function is defined as follows:

**Strategic Routes**

The function of Strategic Routes will be:

(i) to provide for longer journeys and particularly for those by goods vehicles and coaches;

(ii) to link London effectively to the national road system;

(iii) to reduce traffic demands on London Distributor roads so that, in association with restraint policies, they can provide an adequate level of service and, in turn, relieve local roads of through traffic.

The function of these roads is to carry traffic; there will be little or no direct access to adjoining land uses. Facilities for pedestrians and cyclists will generally be for crossing these roads rather than travelling along them.

**London Distributor Roads**

London Distributor roads will cater for journeys within and across Merton and between Merton and other Boroughs. They will provide:

(i) links to the Strategic routes;

(ii) access to strategic centres for short and medium distance traffic;
(iii) the main bus routes and also routes for goods vehicles. London Distributor roads will also distribute traffic to and around, but not within, environmental areas. Traffic management regulations will be used to divert non-essential traffic from environmental areas and to confine it as much as possible to the future network of Strategic and London Distributor roads.

London Distributor roads will support town centre, residential and other adjoining land uses. There will be direct access where appropriate and facilities for pedestrians. Cyclists will be provided for where safety criteria allow.

Local Roads

These fall into two categories:

(i) Local Distributor Roads

Their function is to distribute local traffic within and to each part of the Borough. The overall aim of local distributors is to provide a framework for traffic management and calming schemes in order to achieve environmental and safety objectives. They are not intended to enable increases in capacity of the road network. They form a link between local access roads and London Distributor roads and therefore have an important local traffic-carrying function. They provide suitable routes for emergency vehicles and in some cases public transport. Traffic management and calming measures will be used to regulate the traffic function of Local Distributor Roads to that compatible with the local environment.

(ii) Local Access Roads

Local Access Roads will generally have connections to Local Distributor Roads rather than to London Distributor roads. They should not carry through traffic, the only traffic function of these roads is to provide direct access to buildings and land. Local Access Roads will be subject to traffic calming measures as appropriate.

6.34 The Secretary of State, DETR, has identified a network of Priority (Red) Routes and the GLA, through TfL as the Highway Authority, is responsible for the design, implementation, maintenance and monitoring of measures on these roads. The Priority (Red) Routes in Merton are the A3, A24, and the A297. The approval of the GLA and TfL London Buses is required for schemes or development if they would affect traffic flows on these roads.

POLICY RN.1: PRIORITY NETWORKS

THE COUNCIL WILL IDENTIFY AND IMPLEMENT PRIORITY NETWORKS FOR BUSES, CYCLISTS AND PEDESTRIANS AND INTRODUCE MEASURES ON THESE NETWORKS TO ASSIST AND PROMOTE TRAVEL BY THESE MODES.

Justification

6.35 The London Bus Priority Network has been jointly developed by the London Boroughs and the City of London, London Buses and the Government Office for London. The overall objective of this initiative is to improve operating conditions for buses along the roads on this network and protect buses from the disruptive effects of traffic congestion. Further details of how the Council will continue to develop this network in Merton is described in the Public Transport Section. (See Fig. 6.1).
6.36 The London Cycling Network was developed by all London's local authorities and it is supported by the Government and the Association of London Government. The objective is to provide a network of safe, convenient and conspicuous cycle routes linking residential areas with centres of employment, retailing, education, leisure, and transport. Further details of how the Council is developing this network in Merton is given in the Section on Walking and Cycling.

6.37 The Council has identified a pedestrian network and is in the process of developing a walking strategy to make walking more convenient and safer throughout the Borough. Details of this will be published as supplementary planning guidance when they are established.

POLICY RN.2: IMPROVEMENTS TO THE ROAD NETWORK

ROAD SCHEMES, ALTERATION TO THE ROAD NETWORK, JUNCTION IMPROVEMENTS OR NEW TRAFFIC CONTROL SYSTEMS WILL BE PERMITTED ONLY IF THE WORK PROPOSED WILL SATISFY ONE OR MORE OF THE FOLLOWING:

(i) IMPROVE THE SAFETY OF ROAD USERS, AND IN PARTICULAR VULNERABLE GROUPS INCLUDING PEDESTRIANS, CYCLISTS AND RIDERS OF POWERED TWO WHEEL VEHICLES;

(ii) BENEFIT PUBLIC TRANSPORT SERVICES;

(iii) BENEFIT PEDESTRIANS AND CYCLISTS;

(iv) IMPROVE ACCESS TO DEVELOPMENT SITES WITHIN MERTON;

(v) COMPLEMENT AND CONTRIBUTE TO TRAFFIC REDUCTIONS ARISING FROM POLICY RN.5;

(vi) RELIEVE RESIDENTIAL, TOWN CENTRE AND OTHER SENSITIVE AREAS OF THROUGH TRAFFIC.

Justification

6.38 In general, increasing the capacity of roads generates additional traffic which, in turn, can create more congestion elsewhere on the network. The Council will not promote major road building schemes which significantly increase the capacity of the road network or which have significant adverse environmental effects. However, it will progress road improvements by new and revised links and modifications to junctions, where it can be demonstrated that they provide other transport, economic, environmental and/or safety benefits. The Council's Supplementary Planning Guidance Note on Highway and Parking Standards provides advice on the standards to be adopted in the provision of new roads in connection with development.

6.39 The types of scheme proposed include junction improvements on the Strategic, London Distributor and Local Distributor road networks, new road links to industrial areas that will remove heavy goods vehicles from unsuitable routes, improvements that will allow bus services to reach new areas or to avoid delays and improve their reliability, schemes which will reduce accidents for pedestrians, cyclists and other road users and schemes which produce other environmental benefits (see Proposals Map and Schedule of Proposals). Improvement of the street scene as set out in Chapter 4 will be an important element of all schemes particularly in Conservation Areas. Any green space lost to road improvements will be replaced and priority will be given to environmental considerations.
6.40 The Council has obligations to reduce traffic levels to improve air quality and to comply with the Traffic Reduction Act 1997. Modifications to the road network will play an important role in achieving these changes by reducing traffic capacity in sensitive areas or locations to complement other demand restraint measures that will be developed through Policy RN.5.

**POLICY RN.3: VEHICULAR ACCESS**

DEVELOPMENT PROPOSALS GENERATING OR ATTRACTING A SIGNIFICANT AMOUNT OF TRAFFIC MUST PAY FULL REGARD TO THE BOROUGH ROAD HIERARCHY AND ROAD SAFETY AND TRAFFIC MANAGEMENT POLICIES RN.4 AND RN.5. SUCH DEVELOPMENTS ARE EXPECTED TO BE LOCATED ADJACENT TO LONDON DISTRIBUTOR OR LOCAL DISTRIBUTOR ROADS.

THE FORMATION OF VEHICULAR ACCESS DIRECTLY ONTO THE TRANSPORT FOR LONDON ROAD NETWORK (TLRN) WILL BE DISCOURAGED.

THE FORMATION OF VEHICULAR ACCESS DIRECTLY ONTO LONDON DISTRIBUTOR ROADS WILL ONLY BE PERMITTED WHERE THE FOLLOWING CRITERIA ARE MET:

(i) VEHICLES SHOULD BE ABLE TO TURN SAFELY AND CONVENIENTLY WITHIN THE CONFINES OF THE SITE FACILITATING ACCESS AND EGRESS IN FORWARD GEAR,

(ii) ADEQUATE VISIBILITY IS PROVIDED TO ENSURE THE SAFETY OF ALL ROAD USERS.

(iii) BE SUBJECT TO A SPEED LIMIT OF NO MORE THAN 30 MPH.

(iv) FULL ACCOUNT IS TAKEN OF LOCAL PHYSICAL FEATURES AND ROAD CHARACTERISTICS INCLUDING THE PROXIMITY OF ROAD JUNCTIONS, PEDESTRIAN AND CYCLE CROSSINGS, BUS STOPS AND GENERAL ROAD LAYOUT.

(v) HAVING REGARD TO THE VOLUME OF TRAFFIC ON THE ROAD NETWORK INCLUDING THAT GENERATED BY THE DEVELOPMENT.

THE FORMATION OF VEHICULAR ACCESS DIRECTLY ONTO THE LOCAL DISTRIBUTOR ROADS WILL BE PERMITTED WHERE THE FOLLOWING CRITERIA ARE MET:

(i) ADEQUATE VISIBILITY IS PROVIDED TO ENSURE THE SAFETY OF ALL ROAD USERS.

(ii) FULL ACCOUNT IS TAKEN OF LOCAL PHYSICAL FEATURES AND ROAD CHARACTERISTICS INCLUDING THE PROXIMITY OF ROAD JUNCTIONS, PEDESTRIAN AND CYCLE CROSSINGS, BUS STOPS AND GENERAL ROAD LAYOUT.

(iii) HAVE REGARD TO THE VOLUME OF TRAFFIC ON THE ROAD NETWORK INCLUDING THAT GENERATED BY DEVELOPMENT.

THE FORMATION OF VEHICULAR ACCESS DIRECTLY ONTO LOCAL ACCESS ROADS WILL BE PERMITTED WHERE THE FOLLOWING CRITERIA ARE MET:
(i) ADEQUATE VISIBILITY IS PROVIDED TO ENSURE THE SAFETY OF ALL ROAD USERS.

(ii) TAKE FULL ACCOUNT OF LOCAL PHYSICAL FEATURES AND ROAD CHARACTERISTICS INCLUDING THE PROXIMITY OF ROAD JUNCTIONS, PEDESTRIAN AND CYCLE CROSSING, BUS STOPS AND GENERAL LAYOUT.

Justification

6.41 For development with significant traffic generation/attraction potential it would assist the determination of any planning application if the developer were also to submit a statement showing what considerations have been given to minimising road traffic impacts, and to the relationship the development will have with the vehicular and pedestrian access onto the road network.

6.42 Access directly onto the road network should be dependent on the road safety and traffic management criteria associated with the hierarchy of the affected route. The role of the Strategic Road Network, managed by Transport for London, is to carry vehicular traffic. To maintain the capacity of these roads and to reduce accidents, direct vehicular access is discouraged.

6.43 London Distributor roads are intended to link the network of strategic routes, form the main bus routes and distribute traffic to and around, but not within, local residential neighbourhoods. Adjoining town centre, residential and other land uses are important for these roads and they will need to have access for pedestrians and continue to have a major traffic role in the long term. In consequence, decisions on the development, access and use adjoining these roads will reflect the importance of their traffic role.

6.44 Local Distributor roads have a less important traffic role than Strategic and London Distributor roads, and direct vehicular access will normally be allowed, subject to conditions to protect other road users and road safety.

POLICY RN.4: ROAD SAFETY

THE COUNCIL WILL ENSURE THAT ROAD SAFETY IS A PRIME CONSIDERATION WHEN IMPROVEMENT SCHEMES AND NEW DEVELOPMENT ARE ASSESSED BY CARRYING OUT A SAFETY AUDIT.

THE COUNCIL WILL PUBLISH A ROAD SAFETY PLAN EACH YEAR AND INTRODUCE ENGINEERING AND EDUCATIONAL MEASURES TO HELP REDUCE THE NUMBER AND SEVERITY OF ROAD ACCIDENTS IN LINE WITH TARGETS SET BY GOVERNMENT.

Justification

6.45 The Council has prepared a Road Safety Plan setting out its targets and strategies for reducing accidents. Records for the Borough in 2002 indicate that there were 658 personal injury accidents reported, which resulted in 812 casualties. 5 people were killed and 103 were seriously injured. Pedestrians are particularly vulnerable road users and are more likely to be seriously injured, accounting for 13% of the casualties. Other vulnerable road users are cyclists (8% of casualties) and users of powered two wheelers (20% of casualties) for modes that each account for only about 2 to 3% of trips.
6.46 The Council supports the Government's new targets for casualty reduction by 2010. The Council prepares and reviews regularly a Road Safety Plan which includes the target for casualty reduction and the strategies to be adopted to achieve this target.

6.47 To assist accident reduction, the Council has a Safety Education Section that promotes road safety in schools, trains road users in safe techniques, and publicises road safety material and issues.

6.48 The Council has a programme of engineering schemes aimed at reducing accidents at locations with a high level of accidents. It also ensures that road and junction schemes that have a high accident saving potential are given a high priority. Pedestrian and cycle network schemes that have a high accident saving potential in association with the road network will also be given high priority offering a fully integrated approach to road safety analysis. To ensure that new schemes do not create new accident problems, it is proposed to introduce a system of safety audit.

6.49 Enforcement is a key element in reducing accidents and the Council will continue to press for adequate Police resources for the enforcement of traffic and safety laws.

POLICY RN.5: TRAFFIC MANAGEMENT

The junction and highways improvements proposed in Schedule 1 (11T – 26T) are to be undertaken as part of the Council's traffic management measures. Development likely to jeopardise the listed proposals will not be permitted, unless alternative schemes for highway improvements or increased safety can be introduced as part of the development.

Where improvements to highway safety or to flow of traffic are necessary to support new development, contributions to specific improvement measures will be sought through planning obligations.

Justification

6.50 The acceptance that major road constructions are not the solution to London's transport problems has increased the importance of traffic management to make the best use of available road space. Schedule 1 contains specific improvement proposals for key parts of the road network that will encourage vehicles to make the fullest possible use of the Strategic London Road Network in preference to seeking alternative routes through unsuitable streets and residential areas as advised in the Strategic Guidance for London Planning Authorities (1996). This guidance also recommends that Boroughs take such traffic management measures as may be necessary, including cycling safety initiatives, action to improve the convenience and safety of pedestrians, vehicle restrictions, loading, waiting and signing arrangements and traffic calming measures.

6.51 The Schedule 1 traffic management improvements will be used to ease congestion on the road network and will ensure that any increased capacity is allocated to improve facilities for public transport, cyclists and pedestrians or for the removal of traffic from unsuitable routes. Development proposals in the vicinity of the Schedule 1 improvements that attract/generate a significant amount of new traffic are likely to reduce the benefits accrued from the schemes. The Council will require development
proposals at Schedule 1 locations to include an assessment of the associated traffic impact and proposed solutions to reduce negative impact of increased vehicular activity as outlined in Policy RN.2 and development may be required to make S106 contributions to reduce associated negative traffic impact.

6.52 It will be important to ensure that traffic is not diverted to other unsuitable routes, that adequate access is retained and that bus services are protected from the effects of any increases of traffic that would result from the introduction of traffic calming measures in adjoining residential areas. On-street parking by non-residents, particularly around town centres and railway stations, causes severe problems in residential areas. Measures to resolve these problems are set out in the parking policies, and will form part of a comprehensive approach to traffic management.

6.53 In areas where lorries are a particular nuisance, width restrictions or lorry bans have been implemented and found to be an acceptable method of reducing this nuisance (see Figure 6.3). There maybe some scope for some extra width restrictions but service access, bus routes, turn-around facilities and emergency vehicles access are important considerations. It is also necessary to take an overall view of the wider implications to the community as a whole when such schemes are introduced, particularly where development important to the local economy might be significantly affected or conflicts arise between competing land uses, such as town centres and adjacent residential areas. In other areas, road closures have been applied, sometimes combined with improved junction capacity on the surrounding road network. The Night-time and Weekend Lorry ban has removed some of the largest heavy goods vehicles and, with improved enforcement now taking place, the effectiveness should be maintained.

6.54 To meet the requirements and obligations of the Environmental Act 1995 and Road Traffic Reduction Act 1997, the Council in conjunction with Greater London Authority, other Boroughs and Agencies, is developing a strategy to improve air quality through the implementation of traffic restraint measures. The key objectives adopted are:

(i) To promote sustainable forms of transport;

(ii) To support the economy of the Borough, particularly its regeneration and promote employment opportunities for residents;

(iii) To improve the environment of residential, town centre and other sensitive areas;

(iv) To improve road safety.

6.55 Developments will be assessed in terms of their impact on traffic levels. Developers will be required to minimise traffic flows and impacts by their development and promote access by other more sustainable modes through the imposition of planning conditions or obligations and other measures such as Travel Plans.
POLICY RN.6: LORRY BANS

IN AREAS SUBJECT TO LORRY BANS AND WIDTH RESTRICTIONS, PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT THAT WILL LEAD TO INTRUSION BY LORRIES IN RESIDENTIAL AREAS.

POLICY RN.7: PROVISION FOR GOODS VEHICLES

THE COUNCIL WILL SEEK TO ENSURE THAT EXISTING AND NEW DEVELOPMENT MAKES ADEQUATE PROVISION FOR GOODS VEHICLES BY SATISFYING ONE OR MORE OF THE FOLLOWING:

(i) LOCATING NEW DEVELOPMENT WHERE ADEQUATE ACCESS CAN BE PROVIDED; IN PARTICULAR, ACCESS TO THE STRATEGIC AND LONDON DISTRIBUTOR ROAD NETWORK;

(ii) WHERE APPROPRIATE IMPROVING ACCESS TO EXISTING DEVELOPMENTS AND IMPROVING ROAD JUNCTIONS AND ROADS;

(iii) ENSURING SATISFACTORY PROVISION FOR OFF STREET LOADING/SERVICING AND PARKING IN ALL NEW DEVELOPMENTS, AND IMPROVEMENTS TO EXISTING DEVELOPMENTS;

(iv) SEEKING TO PROVIDE IMPROVED ACCESS WITHIN INDUSTRIAL AREAS BY THE INCORPORATION OF NEW ROADS AND JUNCTIONS IN PLANS FOR INDUSTRIAL DEVELOPMENT AND TRAFFIC CONTROLS.

Justification

6.56 The need to restrict the movement of heavy goods vehicles through residential areas is set out in Policy RN.6. All industrial and commercial properties require good access and loading and unloading facilities if they are to operate satisfactorily. It is, therefore, in the interest of the operators and local residents that these businesses are correctly located and adequate access and servicing arrangements are provided.

6.57 By co-ordinating land use and transportation planning, the Council intends to restrict generators of goods traffic to particular industrial areas which have good access onto appropriate Strategic and London Distributor roads. This helps to reduce the nuisance caused by goods vehicles in residential areas by ensuring that it is of greater advantage to operators to use main roads. Provision of proper loading facilities helps to reduce the conflict caused by lorries servicing premises directly from the road.

6.58 Some existing industrial areas, e.g. Willow Lane, have poor access to the Strategic/London Distributor road network and this results in many heavy goods vehicles using residential roads. In these cases new road links or improvements to nearby junctions will be considered to remove the large vehicles from unsuitable routes. Similarly, road and junction improvements will be considered within industrial areas to improve efficiency and reduce conflict.

6.59 In Mitcham town centre opportunities have been taken to create rear servicing areas for premises fronting onto the new pedestrianised area. The present construction of some buildings in Mitcham town centre may not allow complete removal of frontage servicing.
To maintain access to these premises until rear servicing is possible, suitably defined and constructed temporary service routes have been provided in the pedestrianisation scheme, utilising part of the existing road space. Short-cutting by through traffic has been prevented on these routes by traffic restrictions where necessary.

6.60 In Morden town centre existing rear service roads need to be protected and improved to enable rear servicing to be undertaken. Where development occurs it must ensure that access to rear service routes is maintained. Similarly in Wimbledon town centre new development should make provision for off-street servicing wherever practicable and rear servicing to existing premises should be maintained and improved as opportunities occur. These measures should reduce traffic congestion and road safety problems in the Borough’s town centres.

POLICY RN.8: RAIL FREIGHT

Development involving rail freight handling will be permitted provided that it will not significantly worsen the amenity of residents in the Borough.

Justification

6.61 The strategy for London has been to restrict the movement of heavy lorries but to improve access to individual areas where appropriate and to develop rail and freight alternatives. The Council considers this is the correct strategy to adopt and rail based freight movement will be even more important now the Channel Tunnel has opened. The opportunity will be taken to promote this policy locally but the scope is limited by the siting of industry and the nature of the rail network.

POLICY RN.9: ACCESSIBILITY

The Council will carefully consider the variety of needs of people with disabilities for access to, and movement within, the Borough and will seek to ensure that these needs are taken into account and provided for.

Justification

6.62 New development schemes must be designed to allow for ease and safe access, movement and use by people with disabilities. Easy access to the public transport system is also important for people with disabilities but their transport needs have not hitherto been fully realised. Therefore, the transport system is less accessible to people with disabilities than it could have been. There needs to be a programme of improvements to the accessibility of public transport, which was designed without facilities for people with disabilities. Approximately 7% of the population have difficulty using public transport according to surveys by the Greater London Association for Disabled People. London Buses have a duty under the London Regional Transport Act 1984 to pay due regard to the transport needs of disabled people. The needs of people with disabilities should be integrated into the forward planning and development of the public transport system.

6.63 Traffic management plans will take the needs of people with disabilities into account. For example, dropped kerbs will be provided whenever possible at crossing points and facilities for the partially sighted, such as tactile paving, will also be provided. Thus, facilities will be designed to enable people to alight as close to shopping centres as possible, and suitable parking for people with disabilities will be provided within the town centre. Footways need to be designed to enable access for people in wheelchairs and people with other disabilities and should, therefore, be maintained to a high standard.
The design and layout of street furniture should take into account the needs of people with disabilities, including adequate provision of seats. Access to buildings will also be considered carefully and internal spaces within buildings require consideration to ensure that access for all is provided. The Supplementary Planning Guidance Note for People with Disabilities provides more detailed advice.

WALKING AND CYCLING

POLICY WC.1: INCREASING WALKING

PEDESTRIAN PRIORITY AREAS, PEDESTRIAN DEMONSTRATION PROJECTS, FOOTWAY WIDENING AND SAFER ROUTES TO SCHOOL PROPOSED IN SCHEDULE 1 (29T-32T) AND SHOWN ON THE PROPOSALS MAP ARE TO BE UNDERTAKEN AS PART OF THE COUNCIL'S SET OF MEASURES TO INCREASE WALKING IN THE BOROUGH. DEVELOPMENT PROPOSALS WILL BE EXPECTED TO RESPECT, AND WHERE NECESSARY TO CONTRIBUTE TO, THE LISTED PROPOSALS.

DESIGN OF NEW DEVELOPMENT PROPOSALS WILL BE EXPECTED TO SUPPORT THE OBJECTIVE OF INCREASED WALKING ACROSS THE BOROUGH IN ONE OR MORE OF THE FOLLOWING WAYS:

(i) IMPROVEMENT OF PEDESTRIAN ACCESS THROUGH THE CREATION OF NEW OR MORE DIRECT FOOTPATH LINKS.

(ii) SAFEGUARDING, WIDENING OR IMPROVEMENTS TO EXISTING FOOTPATHS, ACCESS ROUTES OR PUBLIC RIGHTS OF WAY WITH ACCESSIBLE ROUTES FOR ALL, WHEREVER POSSIBLE.

(iii) EMPLOYING MEASURES THAT PROVIDE NATURAL SURVEILLANCE, SECURITY, SIGNAGE AND LIGHTING OF FOOTPATHS.

Justification

6.64 Walking is very important for local journeys to work, shop and leisure activities, and virtually all trips by car or public transport involve a walk of some distance at least at one end. About 48% of all shopping trips made by Merton residents are made on foot and in Mitcham it is around 57%.

6.65 Promoting walking can confer significant benefits in environmental, social, health and economic terms. Walking has historically been undervalued and overlooked as a means of travel, despite its importance and the advantages it can confer.

6.66 Consultation on issues for the Review of the UDP in 1998 revealed that 67% of Merton residents agreed that roadspace be reallocated to pedestrians, cyclists and public transport. Earlier surveys found that walking was often preferred to using the bus because of its reliability for journeys of up to 20 minutes and that safety, maintenance and fouling by dogs were all issues that made walking unpleasant.

6.67 Travel surveys have, in the past, under-recorded walking because of the way the data was collected, but there is evidence that walking is very important and that there is