

DECISION MAKER Cabinet Member for Environment, Sustainability & Transport	DATE 6 August 2021
TITLE West Greenwich Traffic Reduction Scheme - Modifications to the West Greenwich Low Traffic Neighbourhood experimental scheme.	WARD(S) Greenwich West
CHIEF OFFICER Director of Regeneration, Enterprise & Skills	CABINET MEMBER Environment, Sustainability & Transport
DECISION CLASSIFICATION Non-Key Non-Exempt report Non-Exempt appendices	FINAL DECISION TO BE MADE ON THE RECOMMENDATIONS IN THIS REPORT Yes

I. Decision required

This report makes the following recommendations to the decision-maker:

- I.1 To note the information provided in this report about the operation of the West Greenwich Low Traffic Neighbourhood experimental scheme, the outcome of the engagement exercise and the options set out for its future and their potential impacts.
- I.2 To agree to amend the West Greenwich Low Traffic Neighbourhood experimental scheme to vary the access arrangement in Hyde Vale set out in Section 6 to allow vehicular access in both directions, through a camera enforced modal filter on Hyde Vale, between 7am and 9am Monday to Friday.
- I.3 To agree to exempt taxis (as defined in paragraph 6.3 (ii) below) and refuse vehicles from the camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme.
- I.4 To delegate the making of the necessary Traffic Management Orders (TMO) and details of highways works arising from this decision to the Director of Regeneration, Enterprise & Skills.
- I.5 To note that the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 states that if the option to convert the experimental

TMO into a permanent TMO is to be retained, this can only be done if “no variation or modification of the experimental order was made more than 12 months after the order was made”. In this instance, any modification to the West Greenwich Experimental TMO must be made by 25 August 2021. If the proposed modification cannot be made by 25 August 2021 due to a delay as a result of a call-in process, the only available options available to the Council would be to either make the scheme permanent in its current form, go through a further full TMO process to make a permanent TMO in the future (rather than the expedited process to convert the experimental TMO into a permanent one and also risks a gap in in the traffic measures being in place) or abandon the scheme altogether. This is considered, therefore, not be in the public interest and would be detrimental to the Council. It risks not fully addressing the concerns raised, or not having the full opportunity to assess the impact of the proposed modifications, the overall operation of the experimental scheme and optimising the scheme if the decision is made to leave it in place on a permanent basis.

- 1.6 To note that the decisions in this report will necessitate the re-starting of some experimental Traffic Management Order processes, including the associated statutory consultation.
- 1.7 To note that the figures quoted in this report supersede all other figures previously used and are based on a final analysis by Officers.



Signed:

Date: 06/08/2021

Councillor Sarah Merrill, Cabinet Member for Environment, Sustainability & Transport

2. Reasons for Urgency

- 2.1 The West Greenwich traffic reduction scheme was implemented under an Experimental Traffic Regulation Order (ETRO) which was made on 25 August 2020. Traffic Regulation Orders (TROs) are legal documents that enable a local highway authority to prohibit, restrict or reduce the use of a road by traffic.
- 2.2 An ETRO can stay in force for up to a maximum of 18 months while the effects are monitored and assessed. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 allow for the modification of experimental traffic orders but any variation or modification must be made no

more than 12 months after the order was made if the Council wishes to retain the ability to convert the ETRO into a permanent TMO at the end of the experimental process. Any modification to the West Greenwich experimental scheme must therefore be made before the 25 August 2021 to remain within the 12 months period during which modification is permitted.

- 2.3 In order to implement the proposed amendments to the experimental scheme, the Royal Borough is legally required to give Notice in the local press of its intention to implement the changes 7 days before the scheme comes into operation. This means that a decision must be made by 8th August at the latest, which will allow the Public Notice to be published on 11th August 2021 and the Order to come into operation on 18th August 2021.
- 2.4 The consultation undertaken received a significant response, as outlined in Section 9. The process of thoroughly considering these responses, developing the alternative options presented here, based on those responses, and making the improvements to access for emergency services (introduced by a decision dated 14th July 2021 made by Director of Regeneration, Enterprise and Skills) prevented this decision from being made before now.
- 2.5 The Council, therefore, needs to consider now whether to modify the experimental scheme to address concerns raised about the operation of the experimental scheme.
- 2.6 For the reasons set out above, there are clear grounds for urgency, and it would not be prudent, nor in the public / taxpayer's interests to wait for either.
- 5 clear days' notice to be given before a decision is taken
 - Call in to expire
- 2.7 For the reasons set out above and in accordance with paragraph B10 of the Overview and Scrutiny Procedure Rules in the Constitution, the Chief Executive has agreed both that the decision proposed is reasonable and is to be treated as a matter of urgency because any delay likely to be caused by the call-in process would prejudice the public interest.
- 2.8 Given that the decision is urgent and cannot be reasonably deferred, the agreement of the Chair of Overview and Scrutiny Committee has been obtained under paragraph D16 of the Access to Information Procedures in the Constitution that the decision be taken without giving the notice referred to in the paragraph 2.6 above.

3. Links to the Royal Greenwich high level objectives

3.1 This report relates to the Council's agreed high-level objectives as follows:

- A Healthier Greenwich
- A Safer Greenwich
- A Great Place to Grow Up
- A Great Place to Be

4. Purpose of Report and Executive Summary

4.1 This report details responses received from the engagement and consultation on the experimental West Greenwich Traffic reduction scheme).

4.2 The report also presents the options for the future of the West Greenwich Low Traffic Neighbourhood experimental scheme and their potential impacts, for consideration by the Cabinet Member for Environment, Sustainability and Transport in deciding whether to amend or withdraw the scheme. It sets out a preferred option for changes to the scheme, which takes into account feedback received from residents and other stakeholders.

5. Introduction and Background

5.1 Low Traffic Neighbourhoods (LTNs)

LTNs aim to create better places to walk and cycle, improve road safety, reduce congestion, and improve air quality. However, their impact must be considered within the context of the wider area to deliver a fairer and more equitable scheme alongside other LTN aims. They use barriers, such as planters, bollards or cameras to stop through traffic. Residents and businesses can still access their homes and premises by car but they may have to take a slightly longer route.

5.2 West Greenwich LTN

The location of the modal filters that form the experimental West Greenwich LTNs are shown in Appendix A.

5.3 The West Greenwich LTN was implemented in September 2020 and is underpinned by an Experimental Traffic Order. Experimental Traffic Orders can run for up to 18 months and allow the real impact of a scheme to be monitored and assessed. Formal public consultation happens whilst the scheme is in-place, usually during the first six months of the experiment. This allows:

- People to provide feedback based on their actual experiences.

- The Council to understand how new things work before deciding whether to make them permanent, amend them or remove them.

5.4 An online consultation tool was used for consultation on the West Greenwich LTN Scheme. Some previous engagement with local residents had already taken place in 2019 and 2020 about managing through traffic in the area but not on the specific locations of the modal filters. A separate consultation on the nearby Westcombe Park / Maze Hill LTN proposals was also undertaken using the CommonPlace online survey tool.

5.5 Feedback received from residents and other stakeholders during this consultation and engagement included concerns raised about increased traffic on other local roads, with increased levels of congestion and pollution reported. More detail on this is provided in Section 9 below.

5.6 Traffic count data from before and after implementation, shows that there has been a significant decrease in traffic levels within the West Greenwich LTN - up to 92% at certain times, on certain roads. Some traffic counts were also undertaken at the proposed modal filters' locations in the Westcombe Park and Maze Hill area. Traffic count data for West Greenwich LTN can be found at Appendix B of this report. Traffic count data for the Westcombe Park and Maze Hill area can be found in Appendix C

5.7 Emergency access

The Royal Borough worked closely with the Emergency Services and engaged in the cross-London response to the issue. Building on measures taken earlier in the scheme's operation, a separate decision has recently been taken to convert a number of the closures in the West Greenwich LTN to Automatic Number Plate Recognition Camera (ANPR) enforcement and adjust the 'hard closures' at those points. Improved access for emergency services has already been introduced by a decision dated 14th July 2021 made by the Director of Regeneration, Enterprise and Skills because the wording of the West Greenwich ETRO contained an exclusion for emergency services access so that all that needed to be changed were the physical works in this respect. Further access changes beyond emergency services access would require a change to the ETRO itself.

5.8 Authority for the scheme

The West Greenwich Experimental Traffic Regulation Orders (ETROs) were authorised under a report dated 29th June 2020 approved by the Cabinet Member delegating to the Assistant Director authority to "*approve, determine and implement London Streetspace measures and 'Strategic Traffic or Parking*

Management Schemes' for Covid-19 purposes in the borough" (para 1.3). The report stated that:

"The London Streetspace programme has been created to help London boroughs responsibly manage COVID-19's impact on London's transport network" (para 6.2).

5.9 The report goes on to say:

"7.4. For experimental measures, the Experimental Traffic Order process involves a six-month consultation period once the experiment has begun. During this period stakeholders and the public can provide their views on the measures to inform any decision taken on whether to implement the measures on a permanent basis and the Council can also experiment with changes. (These types of Orders initially lasts for 18 months with the option to make them permanent)."

"6.5. The London Streetspace programme has the potential to provide environmental benefits in the form of modal shift towards sustainable transport modes – walking and cycling. This would reduce carbon emissions in the borough. Reducing car usage in the borough would also improve local air quality. These benefits would support the borough's efforts to address the Climate Emergency. The programme has potentially significant Public Health benefits, as active travel forms a key part of a healthy lifestyle."

5.10 The report, therefore, acknowledged that the ETRO would have a dual purpose to address Covid-19 streetspace requirements and to allow stakeholders and the public to provide their views on the measures to inform any decision taken on whether to implement the measures on a permanent basis and the Council could also experiment with changes. A proposal for a LTN in West Greenwich was under consideration prior to Covid 19 and the principal purpose of the ETRO in this instance is to test and evaluate a set of measures and include the ability to modify these measures or make them permanent, but has acknowledged Covid-19 streetspace benefits in the shorter term.

5.11 The Council has considered the public sector equality duty in the Equality Act 2010, including having due regard to advancing equality of opportunity for persons who share a relevant protected characteristic set out in the Act (particularly by reason of age such as the elderly and disabilities, but also those who are pregnant, on maternity or with care responsibilities, race and different sexes), along with eliminating discrimination and other conduct prohibited by the Act. However, the changes recommended in this report are limited to allowing access for refuse vehicles and taxis; and to Hyde Vale, on weekdays

between 7 – 9am only, for general traffic. It is considered that the recommended changes are beneficial and supportive in respect of the Council’s public sector equality duty. Access for refuse vehicles is beneficial in terms of the public sector equality duty, as it would reduce road safety risk, which disproportionately impacts upon persons from some groups with protected characteristics. Allowing access for taxis through the modal filters is beneficial in terms of the public sector duty, given that the persons from some groups with protected characteristics may be more likely to use or be dependent on taxis than others. Allowing access, to Hyde Vale, on weekdays between 7 – 9am only, for general traffic is also considered beneficial for such groups. They would have improved vehicular access to that road during those hours and would benefit from potential reductions in traffic elsewhere for trips they make by car. Paragraph 8.5 notes measures proposed to mitigate impacts arising from increased traffic on Hyde Vale on travel to two schools in the LTN, which could impact on the protected characteristics of age. Additionally, the Council has also previously allowed for better access for emergency services vehicles on which people from some groups with protected characteristics may be more likely to use or be dependent on than others. As such, overall the effect of the changes recommended in this report are viewed clearly as beneficial under the public sector equality duty and no concerns or significant impacts are considered to arise in respect of the proposed changes under the duty.

5.12 If the Cabinet Member were to decide (as the preferred option suggests) that the West Greenwich experimental TMO should be modified and wishes to retain the option to convert the experimental TMO into a permanent TMO under the expedited procedure in the legislation, then Reg. 23(3) of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 states that this can only be done if “no variation or modification of the experimental order was made more than 12 months after the order was made”.

5.13 Long-Term Strategy

It is proposed that the Council develops a borough-wide, over-arching Sustainable Transport Policy, linked to its Local Implementation Plan for transport. It would seek to provide a joined-up approach to the following issues:

- Traffic reduction schemes
- Cycling schemes
- Walking schemes
- Public Transport improvements
- Speed Management schemes
- Vision Zero (casualty reduction) schemes

- Behaviour Change
- Freight management
- Parking and kerbside management

5.14 Traffic assessment and modelling

The Council is working with TfL and traffic modelling experts to develop an approach to providing an enhanced understanding of the traffic impacts of schemes in this area and how they interact with the wider network. The approach may incorporate the following elements:

- Existing automated traffic count sites
- Additional automated traffic count sites
- ANPR camera monitoring to capture origin and destination data
- Identification and monitoring of possible traffic displacement routes
- Impact on surrounding road network
- Impact of other nearby Traffic Management Schemes already implemented
- Junction Layout
- Congestion and journey time
- Route Choice (by time of day)
- Behaviour Change (to other transport modes)
- Access for emergency and essential vehicles

5.15 Monitoring Air Pollution

The Council is currently exploring options for improving the monitoring of air quality at LTN sites. Whilst the most accurate method of collecting data is through the borough's fixed monitoring sites, these have limited scope for scheme-by-scheme analysis. An approach is being scoped and costed, that could include the following elements:

- Diffusion tubes to monitor pollution levels at:
 - Locations within LTN areas
 - LTN boundary road locations
 - Possible displacement route locations
- Any appropriate mid-range, new to market, air quality monitoring options identified (between fixed monitoring and diffusion tubes).

5.16 Communication

The Council is currently exploring better ways to engage and consult with stakeholders in this type of scheme. An approach is being scoped and costed, that could include a series of externally facilitated workshops which allow a representative sample of interested residents to co-design future proposals.

6. **Available Options**

- 6.1 Option 1:
To make no modifications to the scheme.
- 6.2 Option 2:
To modify the scheme as proposed.
- 6.3 Option 2 would consist of three modifications:
- i Amend the experimental West Greenwich LTNs hours of operation to reduce pressures on other areas, whilst maintaining many of the benefits of the LTN. This would involve modifying the existing 'hard closure' at Hyde Vale to allow motor vehicles to have access through a camera enforced modal filter:
 - in both directions;
 - between 7.00 AM and 9.00 AM; and
 - between Monday and Friday.

As part of this Option 2 minor works would be undertaken to manage traffic on Hyde Vale and other affected routes, particularly around schools. This would include improved signage and lining.
 - ii Incorporate exemptions to camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme for taxis. This would include black cabs (ie hackney carriages) but not private hire vehicles (such as minicabs).
 - iii Incorporate exemptions to camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme for refuse collection vehicles.
- 6.4 Option 2 would require an amendment to the existing Experimental Traffic Order, which would necessitate the re-starting of some experimental Traffic Management Order processes, including the associated statutory consultation. Feedback, comments on, and formal objections to the Order could then be made within six months of any amendment coming into force.
- 6.5 Implementing Option 2 is estimated to cost around £25,000, to be funded from the Royal Borough's 2021/22 Local Implementation Plan (LIP) allocation.

- 6.6 Option 3:
Make different modifications to the scheme.
- 6.7 Option 4:
Withdraw the scheme (and return the streets to how they were before the trial).

7. **Preferred Option**

- 7.1 The preferred option is to implement Option 2: to modify the scheme as proposed. Option 2 would consist of three modifications:
- i. Amend the experimental West Greenwich LTNs hours of operation as set out above to reduce pressures on other areas whilst maintaining many of the benefits of the LTN;
 - ii. Exemption to camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme for taxis (as defined in paragraph 6.3 (ii)); and
 - iii. Exemption to camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme for refuse collection vehicles.

8. **Reasons for Recommendations**

- 8.1 Option 2, modifying the West Greenwich LTN experimental scheme, would reduce pressures on other areas whilst maintaining many of the benefits of the LTN.
- 8.2 The West Greenwich LTN experimental scheme has offered significant benefits to that area. This is reflected in the reduced traffic flows described above and the consultation results presented in Section 9 of this report. An analysis of responses received shows that 63.3% of responses from within the scheme area expressed a positive preference for the LTN. However, significant concerns have been raised about the increased levels of traffic seen in areas outside the West Greenwich LTN, especially the Maze Hill and Westcombe Park area, since its implementation.
- 8.3 The COVID-19 emergency continues to bring about changes in travel patterns unprecedented in recent history. The network in this area has been particularly

affected: it has seen significant changes made by the Royal Borough, TfL and the Royal Parks; and it has limited capacity to cope with disruption from incidents.

- 8.4 Traffic flow data from before and after implementation, shows that there has been a significant decrease in traffic levels within the West Greenwich LTN - up to 92% at certain times, on certain roads. Traffic counts were also undertaken at the proposed modal filters' locations in the Westcombe Park and Maze Hill area. Traffic data for West Greenwich LTN can be found at Appendix B of this report. Traffic flow data for the Westcombe Park and Maze Hill area can be found in Appendix C. This indicates significant increases in flow on routes in that area.
- 8.5 Option 2 offers a more equitable approach to managing through traffic in the area. It would provide additional road capacity at the time of highest demand, with a view to mitigating the traffic, health and road safety concerns identified about the surrounding road network. It balances this with healthy and sustainable transport objectives by maintaining the benefits of the LTN for the rest of the day during the week and all day at weekends.
- 8.6 There are two schools within the West Greenwich LTN area: James Wolfe Primary School, with entrances on Royal Hill and King George Street; and St. Ursula's, accessed from Crooms Hill and Hyde Vale. Allowing time limited motor vehicle access along Hyde Vale could increase the level of traffic passing these schools during morning arrival times above that seen during the West Greenwich LTN experimental scheme's operation. They could also potentially increase beyond the level seen before the LTN's implementation. Lack of space means that scope for changes to the road layout near these schools is extremely limited. Subject to the Cabinet Member agreeing the recommendation of Option 2, consideration will be given to improvements to signage, road markings, visibility at crossing points and additional work with pupils to mitigate any possible impacts where possible.
- 8.7 Incorporating exemptions to camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme for taxis (as defined in paragraph 6.3 (ii)) would offer significant benefits to Royal Greenwich residents. Where modal filters are converted to camera enforcement, it is possible and increasingly common practice to allow taxis to pass through. Taxis are disproportionately used by those with mobility issues and those on the lowest incomes. They can also form an important part of car-free living, increasing the range of public transport, walking and cycling trips. Giving taxis priority access would be in-line with the priority afforded to taxis and public

transport in other locations (such as bus lanes) and would follow the trend of recent case law.

- 8.8 Incorporating exemptions to camera enforced modal filters in the West Greenwich Low Traffic Neighbourhood experimental scheme for refuse collection vehicles, offers significant road safety benefits. The Royal Borough's refuse collection vehicles regularly access properties throughout the LTN. Hard closures necessitate reversing and turning manoeuvres when refuse collection vehicles reach the closure, increasing road safety risk. Where modal filters are converted to camera enforcement it is possible to allow refuse collection vehicles to pass through modal filters, avoiding the abovementioned reversing and turning manoeuvres. This would contribute to a safer walking and cycling environment, and would not increase the number of trips made through the LTN area, so would be consistent with the scheme's objectives.
- 8.9 Option 1, to make no modifications to the scheme, and Option 3, to make different modifications to the scheme, are not recommended. They would not address the traffic (and other related) issues reported in areas outside the West Greenwich LTN, especially the Maze Hill and Westcombe Park area, since its implementation (summarised above).
- 8.10 Option 4, to withdraw the scheme (and return the streets to how they were before the trial), is not recommended. It would fail to deliver the improved walking and cycling environment sought by the Royal Borough's Local Implementation Plan for transport and draft Carbon Neutral Plan. It would also be contrary to the consultation results presented in Section 9: which show that 63.3% of responses from within the scheme area were positive about the LTN.

9. Consultation Results

9.1 This section summarises responses from: engagement in the West Greenwich LTN area; petitions presented to the Council; and work with the emergency services.

9.2 Engagement on traffic improvements in the West Greenwich LTN area

Over several years, many residents of the area contacted the Council, concerned about traffic using residential streets to avoid the A-roads bordering the area.

- The area has narrow streets and high footfall, due to Greenwich Park, two schools and other local amenities.
- It was one of the last neighbourhoods in the area without robust traffic reduction measures.

9.3 In 2018, the Council consulted on proposals to reduce traffic on Burney Street and the feedback received suggested an area-wide approach was needed.

9.4 In November and December 2019, the Council undertook engagement on two potential options to reduce traffic in West Greenwich:

- The two options received between 23% and 42% support from residents of the area each.
- Feedback supported the need for intervention but not a clear preferred option.
- A range of feedback helped to inform the measures subsequently implemented.

9.5 Trial measures were implemented on an experimental basis in **September 2020**. The measures are underpinned by an Experimental Traffic Order. An Experimental Traffic Order can run for up to 18 months and allows the real impact of a scheme to be monitored and assessed. Public consultation happens whilst the scheme is in-place, usually during the first six months of the experiment. This allows:

- People to provide feedback based on their actual experiences; and
- The Council to understand how new things work before deciding whether to make them permanent, amend them or remove them.

9.6 An online consultation tool was used for consultation on the West Greenwich LTN experimental scheme.

9.7 Sentiment analysis of the responses who expressed a preference showed that overall 52% made positive comments and 48% made negative comments about the scheme (excluding ‘other’ responses). This is the overall breakdown of all responses from within and outside the LTN area.

9.8 Responses from the area within or directly adjacent to the West Greenwich LTN, within which properties received leaflets promoting the consultation (see map in Appendix D), were considered as in the scheme area. The analysis in the table below shows:

- 63.3% of responses from within the scheme area were positive about the LTN.
- 18% of from outside of the scheme area were positive about the LTN.

	% of responses
All areas	
For	47.2
Against	43.6
Other	9.2
TOTAL	100
In area	
For	63.3
Against	25.3
Other	11.5
Outside area	
For	18
Against	76.8
Other	5.2
TOTAL	100

Table I West Greenwich LTN consultation: sentiment analysis

9.9 Survey comments were analysed to identify common themes within them. The themes identified in comments and the frequency with which they arose are listed in the following table. More frequently occurring themes are also shown visually in the following figures.

Theme	Frequency of responses
Negative comments:	
Increased traffic and pollution elsewhere (non-specific)	157

East Greenwich roads (Maze Hill, Vanbrugh Hill etc) - increased traffic and pollution	149
A2 - increased traffic and pollution	113
Blocked access to shops, services and amenities	81
Division/segregation between rich and poor - favours more affluent residents	57
Lower Road (A206) - increased traffic and pollution	49
Concerns about emergency services' access	38
Concerns about people with mobility issues	35
Greenwich South Street - increased traffic and pollution	33
Greenwich Town Centre/High Road - increased traffic and pollution	33
Lindsell Street/Dabin Crescent - increased traffic and pollution	32
Cycle lanes on lower road - concerns over safety and/or under usage	26
ANPR - residents' exemptions	18
Hyde Vale - right turn onto A2 should be allowed with junction improvement	17
General Wolfe Road (Crooms Hill) - right turn onto A2 is dangerous	16
Delivery vehicles can't get through	13
Scheme has damaged local businesses	13
East Greenwich - introduce LTN here	10
Some drivers acquired keys to bollards to gain access	9
Maze Hill j/w Trafalgar Road - improve traffic light phasing to allow more vehicles through	8
Royal Hill - increased traffic and pollution	8
A2 - right turn on to Greenwich South Street should be improved	6
Closures should be time limited	6
People park on opposite sides of filters to where they live	6
Scheme closures should have been at tops of hills	6
The Avenue should be re-opened	6
Ashburnam area (triangle) - increased traffic and pollution	5
King George Street – should not be 2 way	5

Cars driving down wrong side of roads to avoid queues	4
Delivery mopeds and other motorcycles ride through filters	4
Prioritise resident only parking	4
Hyde Vale - banned right turn onto A2 needs to be improved	4
King George Street - increased traffic and pollution	4
King George Street - now too difficult to leave or enter	4
King George Street - traffic now speeding	4
Blisset Street, Royal Hill, Burney St - now a 'rat run'	3
Crooms Hill - make one-way instead of having filter	3
Crooms Hill and Hyde Vale should be one-way, one up and one down	3
Crooms Hill j/w King George Street – poor visibility	3
Trinity Grove - increased traffic and pollution	3
Warning signs about scheme need to be improved	3
Cade Road - change direction of one-way restriction	2
Closures should be timed to deter PM rat run	2
Maidenstone Hill - move filter	2
Mopeds and M/Cs ride on footways to bypass traffic queues	2
Scheme is dangerous for cyclists	2
The main road network needs to be improved before restricting residential roads	2
There are insufficient EV charging points on one side of the closures	2
A2 - all junctions from Hills and Vales need to be reassessed - lights and right turns	1
A2 - footbridge like during Olympics	1
A205 - increased traffic and pollution	1
All 'hills' in scheme area should be one-way from A2	1
ANPR controlled access to The Avenue for residents	1
Blanket 20 mph instead of LTN scheme	1
Bring back the one-way system that was used during the Olympics	1
Bus lane causes delay for ferry approach	1

Charlton Way - should be two-way	
New station in Blackheath Standard	
Crooms Hil - church needs keys to bollards for funeral services etc	
Crooms Hill - should be re-opened	
Current 20 mph zones not enforced and traffic calming ineffective	
Delivery drivers park across closures and walk deliveries through, blocking emergency access	
Dutton St/Maidenstone Hill junction - remove a parking bay to improve access	
Dutton St/Maidenstone Hill/A2 junction is dangerous	
Greenwich South Street - increased speeding	
Greenwich South Street j/w A2 - improve junction capacity	
If scheme is removed, ALL closures in area should be reopened, even ones installed before this schemeones	
Increase bike parking and hangers in area	
Kidbrooke Gardens - increased traffic and pollution	
King George St - close at j/w Crooms Hill	
King George St - remove parking bay near Crooms Hill junction to improve junction	
King George Street - needs further traffic calming	
King George Street j/w Hyde Vale - drivers don't give way to Hyde Vale since closures and cycles continue to use Hyde Vale so causes risk	
Little Royal Hill - one-way is too short, should be Greenwich South Street to Blissett St	
Local congestion charge instead of closures	
Maidenstone Hill - Increased traffic and pollution	
Maidenstone Hill - j/w A2 dangerous	
Maze Hill and Vanbrugh Hill should be one-way (one up and one down)	
Number of EV charging points needs to be increased	
Park should stay open after dark to allow cyclists to avoid trunk roads	
Park Vista - reopen westbound	

Pedestrian crossings should be improved	1
Point Hill - needs turning space at bottom of hill	1
Point Hill - should be opened one-way to allow local residents to access the town centre	1
Point Hill and Royal Place Emergency Services' access	1
Reduced passing traffic causes personal safety concerns	1
Royal Hill - convert some pay and display spaces to dual use resident permits spaces as closures have caused an unequal split of resident spaces	1
Royal Hill - doesn't need to have lower part as one-way	1
Royal Hill - increased speed	1
Royal Hill - pedestrianise this road	1
Royal Hill - should have traffic reduction measures near school	1
Scheme disregards residents living north of Royal Hill	1
St Catherine Grove j/w Devonshire Drive - no entry often ignored	1
Ulundi Rd - should be one-way	1
Winforton St - closed access makes parking almost impossible	1
Positive comments:	
Safer/slower traffic	196
Continue/make permanent	146
Traffic has reduced	134
Non-specific message of support	125
Pollution reduced	120
Cyclist safety improved	115
Noise reduced	87
Pedestrian safety improved	74
Conflict/argument/aggression reduced	63
Modal shift to walking/cycling	61
Cycling is now nicer	56
Achieved aims and objectives set out by Council	56
Cleaner	53

Children playing in streets again	53
Commuter/commercial traffic kept off these roads	45
Enhances Air Quality	40
Slight inconvenience of not being able to make some journeys by car is outweighed by benefits	39
Walking is now nicer	37
Happy that council has taken action/listened	34
Initial teething problems settled/addressed/easing	24
Feels like residential area/community again/for first time	22
Add more filters elsewhere	21
Health improved	20
Improved quality of life	17
Negative commenters not giving viable alternatives	14
Makes Greenwich a nicer place to live	12
Crooms Hill - reduced traffic	12
Maidenstone Hill - reduced traffic	10
Mental health improved	9
Traffic flow improved	8
Local shops are thriving	7
Hyde Vale - reduced traffic	7
Royal hill - reduced traffic	6
Negative commenters are very vocal	6
Maidenstone Hill - reduced pollution	6
King George St - reduced traffic	6
Makes Greenwich nicer to visit	5
Sleep improved	4
Point Hill - reduced traffic	4
Enjoy my street again	4
Aids social distancing	4
Wish this had been done years ago	3
Change to ANPR	3

Was going to move out of London before LTN, now staying	2
Royal Hill - improved safety	2
Wildlife has been flourishing	1
Traffic in Greenwich TC has reduced	1
More advance signs required	1
Makes area more exclusive	1
Like flowers in the planters	1
First time in 20 years kids are cycling in the street	1
Feedback from non locals should have less weight	1
Emergency Service response has improved	1
Blisset Street - reduced traffic	1
A2 traffic flow has improved	1

Table 2 West Greenwich LTN: themes found in responses.

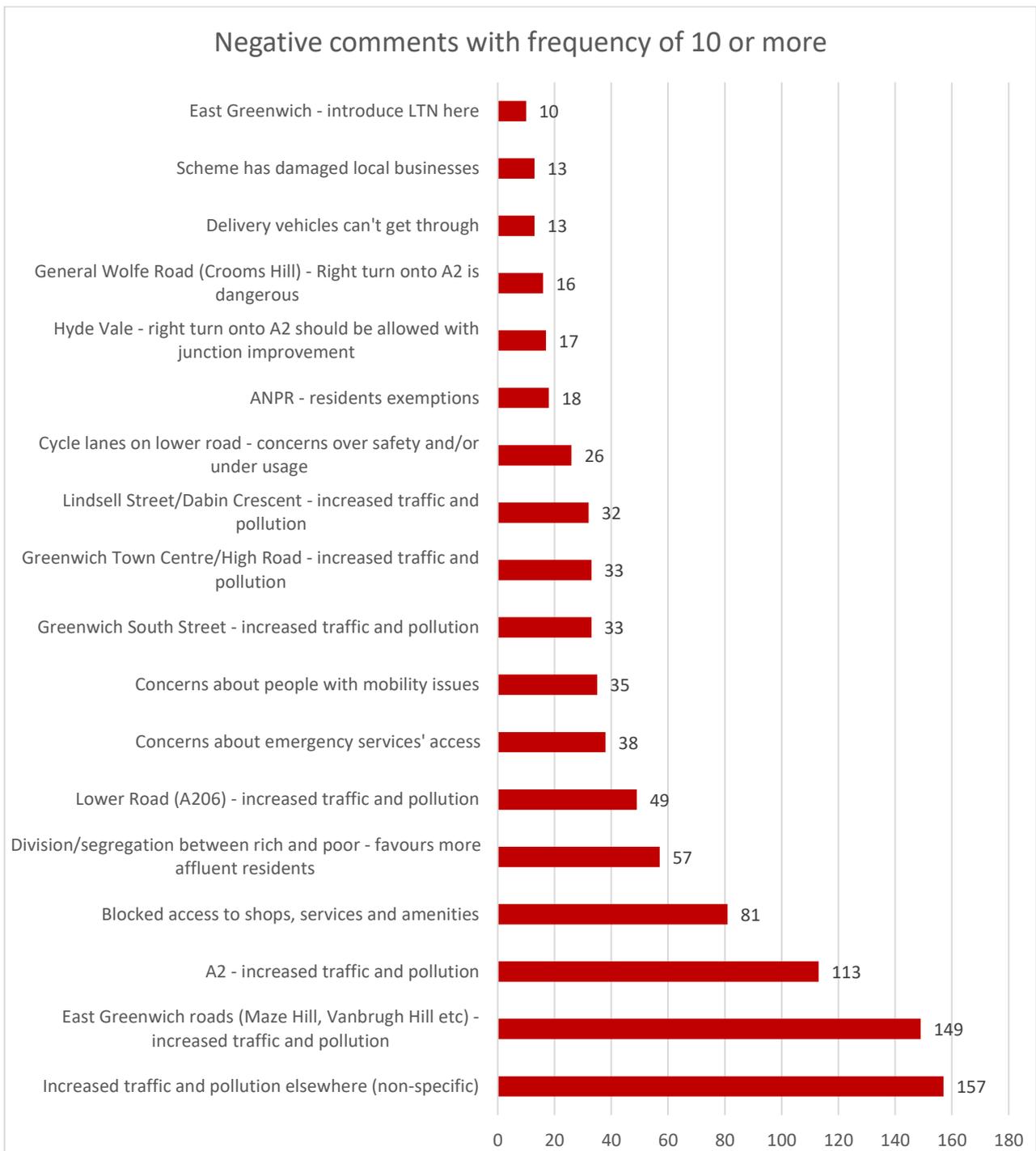


Figure I West Greenwich themes found in more than 10 negative responses.

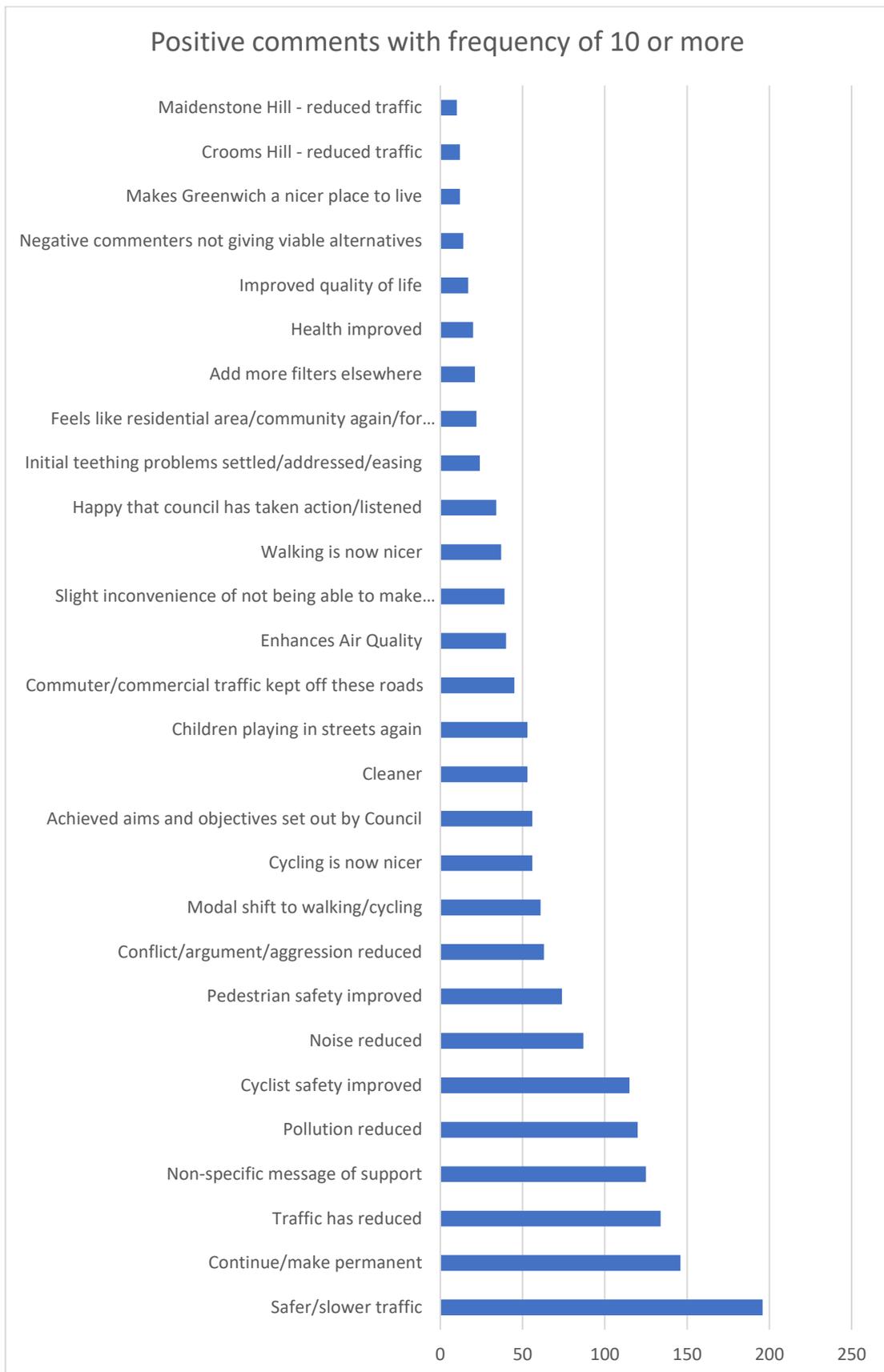


Figure 2 West Greenwich themes found in more than 10 positive responses.

9.10 Table 2, Figure 1 and Figure 2 show the range and number of comments related to increased traffic (and impacts of increased traffic, such as pollution). General concerns of this type formed the most frequently raised theme and specific concerns about traffic in the Maze Hill and Westcombe Park area the second most frequently raised theme. Therefore, the key and main issues in representations in opposition to the scheme relate to impacts on surrounding areas and roads, where respondents suggested the LTN had increased vehicle flows. These included related issues which are set out in Table 3 below with a summary of the response to them:

Issue	Response
Impacts on surrounding areas and roads, where respondents suggested the LTN had increased vehicle flows.	The preferred option recommended is intended to offer a more equitable approach to managing through traffic in the area. It would provide additional road capacity at the time of highest demand, with a view to mitigating the traffic, health and road safety concerns identified about the surrounding road network.
Congestion and delay: to traffic generally, to people with mobility issues specifically and the emergency services.	
Pollution, noise and safety impacts associated with increased levels of traffic.	

Table 3

9.11 Representations in support were also made and tended to focus on the benefits of a lower traffic environment in the scheme area. These included the following key and main issues:

Issue	Response
Increased safety and attractiveness of streets for cycling and walking.	The preferred option recommended seeks to maintain the majority of the benefits of the LTN for the rest of the day during the week, and all day at weekends.
An improved environment, including in terms of noise and air quality emissions.	
A range of improvements less directly transport related, such as the use of streets for play and social interaction.	

Table 4

9.12 Petitions

A total of eight petitions (five supporting the West Greenwich LTN and three against), containing a total of 4099 signatures (“Petitions”), from residents of Royal Greenwich were presented to the Full Council meetings on 25th November 2020 and on the 27th January 2021. These eight petitions were considered at the meeting of the Highways Committee on 24th February 2021. Details can be found at the following link: [Document.ashx \(royalgreenwich.gov.uk\)](#).

9.13 A further petition calling for the reversal of the West Greenwich LTN was presented to Full Council on the 25th February 2021 and was considered at the meeting of the Highways Committee held on the 7th of July 2021. Details can be found at the following link: [Document.ashx \(royalgreenwich.gov.uk\)](#).

9.14 The petitions included the following key and main issues:

Issue	Response
<u>In opposition:</u>	
Diversion of traffic to other areas, especially the Maze Hill and Westcombe Park area.	The preferred option recommended is intended to offer a more equitable approach to managing through traffic in the area. It would provide additional road capacity at the time of highest demand, with a view to mitigating the traffic, health and road safety concerns identified about the surrounding road network.
Emergency services’ access.	
The combined impact of schemes implemented in a similar area, at around the same time.	
Accessibility through the area.	
The public engagement undertaken 2019: its sufficiency and how its outcomes were incorporated within this scheme.	The early engagement undertaken in November and December 2019 was appropriate for its purpose: to inform the development of options to reduce traffic in West Greenwich, that would, in-turn, be implemented with appropriate consultation. Feedback supported the need for intervention but not a clear preferred option and helped to

	inform the experimental measures subsequently implemented.
The appropriateness of an experimental TMO.	<p>An Experimental Traffic Order was selected to allow the real impact of the LTN to be monitored, assessed and improved– to ensure it works in the best way for Royal Greenwich.</p> <p>Formal public consultation happened whilst the scheme was in-place. This allowed:</p> <ul style="list-style-type: none"> • People to provide feedback based on their actual experiences. • The Council to understand how new things work before deciding whether to make them permanent, amend them or remove them. <p>Paragraphs 5.2 – 5.10 provide more detail on the authority for the Experimental Order.</p>
<u>In support:</u>	
The unsuitability of roads in the LTN area for the volumes of traffic they previously experienced.	The preferred option recommended seeks to maintain the majority of the benefits of the LTN for the rest of the day during the week, and all day at weekends.
The improved environment in the LTN area, and the perceived increase in active travel resulting from it.	

Table 5

9.15 In both of the above-mentioned Highways Committee meetings, both the receipt of and the responses proposed to the petitions were noted. The responses recommended for these petitions were:

On 24th February 2021:

“The Royal Borough of Greenwich will consider the Petitions within the analysis of the West Greenwich Traffic Reduction Scheme so that it can be considered alongside other local feedback received in line with statutory process”.

On 7th July 2021:

“The petition be noted and its contents considered within the analysis of the West Greenwich Traffic Reduction Scheme consultation, alongside other local feedback and the Highways Committee’s comments by the Full Council and formally by the Cabinet Member for Environment, Sustainability & Transport”.

9.16 In summary, there have been a wide range and mix of views on the West Greenwich LTN, with some in opposition and some in support. Approximately 524 objections and approximately 568 representations in support have been received. This equates to an overall 52% level of support from the responses that expressed a preference.

9.17 Emergency Services

The emergency services support the aims and objectives of schemes that are designed to reduce traffic and improve air quality. The Council has liaised closely with representatives from all three emergency services and have also participated in pan-London working groups with them to identify ways to incorporate their access needs into traffic reduction schemes. Based on issues identified across the London region, the Emergency Services have indicated that they prefer LTN schemes that are not solely enforced by ‘hard closures’, but include camera enforced restrictions to allow access routes for their crews.

9.18 Building on measures taken earlier in the scheme’s operation, as a result of these discussions, a separate decision has recently been taken to convert a number of the closures in the West Greenwich LTN to Automatic Number Plate Recognition Camera enforcement and remove the ‘hard closures at those points. As a change to the West Greenwich ETRO was not required, the physical measures to improve emergency services access have already been provided under a decision dated 14th July 2021 by the Director of Regeneration, Enterprise and Skills. This will significantly improve access for the emergency services.

10. **Next Steps: Communication and Implementation of the Decision**

10.1 The preferred option is to implement Option 2, to modify the experimental West Greenwich LTN as proposed. If the preferred option is agreed by the Cabinet Member, amendments will be required to the Experimental Traffic Order underpinning the West Greenwich LTN. Paragraph 1.4 recommends the making of these amendments is delegated to the Director of Regeneration, Enterprise & Skills (if this option is selected).

10.2 Making these orders would require an amendment to the experimental TMO. There would be two options for doing this. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 states that if the option to convert the experimental TMO into a permanent TMO is to be retained, this can only be done if *“no variation or modification of the experimental order was made more than 12 months after the order was made”*. Therefore:

- I. If modifications to the West Greenwich Experimental TMO were to be made by 25th August 2021, the option to convert the experimental TMO into a permanent TMO through the expedited process in the legislation would be retained (which avoids the need to go through the full TMO preparation process for a permanent TMO). The Council would be able to make any amendments decided upon through this decision and consult on them over the following six months, before taking a decision on whether to make permanent or remove the Order by 25th February 2021
- II. If modifications to the West Greenwich Experimental TMO were to be made after 25th August 2021, the option to convert the experimental TMO into a permanent TMO would not be available through the expedited process in the legislation.

An amended Experimental TMO could continue in-force until 25th February 2022. The Council could consider making a permanent Traffic Management Order for a continuation of a West Greenwich LTN, through the normal processes for making a permanent Traffic Regulation Order, including statutory public consultation for at least 21 days and consideration of any significant material objections arising from it. If the Council were to pursue this option and wished to have the option to keep a LTN in-place continuously in West Greenwich, the decision considering whether to making a permanent Traffic Regulation Order would have to be made before 25th February 2022 and be preceded by all consultation and other processes required.

II. **Cross-Cutting Issues and Implications**

Issue	Implications	Sign-off
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<p>Legal including Human Rights Act</p>	<p>The West Greenwich TMO was made as an experimental traffic regulation orders (ETRO) under S9 of the Road Traffic Regulation Act 1984.</p> <p>The principal purpose of such an order is to enable a genuine experimental period to be carried out whereby the order and traffic regulation measures are in place for up to 18 months giving the public an opportunity to make representations to the Council with the measures in place. The Council can then make adjustments if thought justified and also decide whether the order and measures should be made permanent, amended or removed, having regard to the representations and objections received.</p> <p>In this instance, the ETRO also had a dual purpose of addressing Covid-19 streetspace requirements in the shorter term by an approval of the Assistant Director under a delegation to them from the Cabinet Member for Covid-19 purposes.</p> <p>It is considered that under Part 3 of the Council's Constitution any significant and substantial or material objections received require consideration by the Cabinet Member and, therefore, representations and objections and any significant decisions as a consequence need to be reported to the Cabinet Member for a decision on the West Greenwich ETRO.</p> <p>If the Cabinet Member were to decide that the West Greenwich ETRO should be modified and wishes to retain the option to convert the experimental TRO into a permanent TRO under the expedited procedure in the legislation, Reg. 23(3) of the <u>Local Authorities' Traffic Orders</u></p>	<p>John Scarborough, Director of Legal Services, 6 August 2021</p>
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(Procedure) (England and Wales)

Regulations 1996 states that this can only be done if “no variation or modification of the experimental order was made more than 12 months after the order was made”.

An extension of time for the duration of the West Greenwich ETRO is not permissible in this particular instance because the order was already made for the maximum period of 18 months allowed under S9 of the Road Traffic Regulation Act 1984. Should the Council wish to use the expedited process in the legislation to make the experimental order permanent at the end of the 18 month period, it will need to complete all relevant steps within that 18 month period or alternatively follow the full process for making a permanent TRO.

Traffic regulation measures have the potential to interfere with human rights, depending on the measures in question, but the recommended changes to the traffic measures can still be justified if proportionate and necessary as appears to be the case in this instance given the analysis of impacts provided in this report.

Similarly, the recommended changes to the traffic measures potentially have implications pursuant to the Council’s public sector equality duty with regard to having the potential to impact some groups with protected characteristics under the Equality Act 2010. It is important that this is considered in this report. It is noted that that due regard has been given in the report to this issue and that the conclusion is that the recommended changes to the ETRO would be beneficial under the duty and no significant issue or concern arises with respect to those changes.

<p>Finance and other resources</p>	<p>The Cabinet Member for Environment, Sustainability & Transport is requested to note the outcome of the engagement exercise and to agree to amend the experimental West Greenwich Low Traffic Neighbourhood experimental scheme as set out in paragraph 1 of the report.</p> <p>The Cabinet Member is also requested to delegate the making of the necessary Traffic Management Orders (TMO) and details of highways works arising from this decision to the Director of Regeneration, Enterprise & Skills.</p> <p>Implementing Option 2 is estimated to cost £25,000 and will be funded from the 2021/22 TFL's Local Implementation Plan (LIP) allocation.</p>	<p>Sue Rock Accountancy Business Change Manager</p> <p>6 August 2021</p>
<p>Equalities</p>	<p>The changes recommended in this report, as a result of feedback received from the consultation, are limited to: allowing access for refuse vehicles and taxis (as defined in paragraph 6.3(ii)); and access to Hyde Vale, on weekdays between 7 – 9am only, for general traffic.</p> <p>It is considered that the recommended changes are overall beneficial and supportive in respect of the Council's public sector equality duty. This includes having due regard to advancing equality of opportunity for persons who share a relevant protected characteristic set out in the Act (particularly by reason of age, such as older people, and disabilities; but also on pregnancy, maternity, with care responsibilities, race and different sexes), The Council has also previously allowed for better access for emergency services vehicles, on which people from some groups with protected characteristics may be more likely to use or be dependent on than others.</p>	<p>Ryan Bunce Transport Strategy Manager</p> <p>5 August 2021</p>

	<p>As such, overall the effect of the changes recommended in this report are viewed clearly as beneficial under the public sector equality duty and no concerns or significant impacts are considered to arise in respect of the proposed changes under the duty.</p> <p>Please see paragraph 5.11 of the report for further details.</p> <p>The Council will continue to assess equality issues in relation to any further decisions that are made of the West Greenwich ETRO to ensure compliance with its equality duties.</p>	
Climate change	<p>The proposals would contribute directly to the transport objectives of the Royal Borough's draft Carbon Neutral Plan. They would enable safe walking and cycling for people of all ages, and support a wider strategy to reduce traffic and reliance on private cars.</p>	<p>Ryan Bunce Transport Strategy Manager</p> <p>5 August 2021</p>

12. Report Appendices

- Appendix A: West Greenwich LTN plan
- Appendix B: Traffic count data from the West Greenwich LTN area.
- Appendix C: Traffic count data from the Maze Hill and Westcombe Park area.
- Appendix D: Map of the area (within or directly adjacent to the West Greenwich LTN) which received leaflets promoting the consultation.

13. **Background Papers**

None.

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