

DECISION MAKER Cabinet Member for Environment, Sustainability & Transport	DATE: 23 February 2022
TITLE West Greenwich Low Traffic Neighbourhood experimental scheme - ADDENDUM REPORT	WARD(S) Greenwich West
CHIEF OFFICER Director of Communities, Environment & Central	CABINET MEMBER Environment, Sustainability & Transport
DECISION CLASSIFICATION Key Urgent Non-Exempt report Non-Exempt appendices	IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING? Yes

ADDENDUM REPORT

I. Decision required

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

- I.1 To note the additional engagement results from the West Greenwich Low Traffic Neighbourhood (LTN) consultation between 21st December 2021 and the end of the consultation (on 18th February 2022).
- I.2 To consider the updated information arising from responses after 21st December 2021 alongside the other information presented in the main 'West Greenwich Low Traffic Neighbourhood experimental scheme' report (referred to as the 'Main Report') in considering the options set out in this report.
- I.3 To approve the removal of the West Greenwich LTN (and the return of the streets to how they were before the trial) by allowing the existing Experimental Traffic Regulation Order (ETRO) to expire on 25 February 2022; and to authorise Council officers to begin the process of developing an alternative LTN traffic scheme for West Greenwich (Option 3 in the Main Report)
- I.4 To note that the figures quoted in this report supersede all other figures previously used.

Signed
Councillor Sarah Merrill, 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 25th 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, this period ends and the ETRO expires on 25th February 2022. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 allow for the modification of experimental traffic orders, no more than 12 months after the order was made otherwise the option to make the order permanent is lost. Informed by the results of the consultation undertaken at that point, in August 2021 the Cabinet Member for Environment, Sustainability and Transport took a decision to amend the ETRO.
- 2.3 If the Council wishes to retain the ability to convert the ETRO into a permanent TRO at the end of the experimental period it will be necessary to take a decision on the West Greenwich experimental scheme after the consultation closes on 18th February 2022 and before the ETRO expires on 25th February 2022.
- 2.4 The Council, therefore, needs to consider now whether to make the experimental scheme permanent.
- 2.5 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 call in to expire.
- 2.6 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.

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*

The Royal Borough's Local Implementation Plan for transport sets out the role of transport in addressing these challenges and creating a 'Healthier Greenwich', particularly by increasing active travel.

- *A Safer Greenwich*

The Royal Borough's Local Implementation Plan for transport sets out the role of transport in helping to ensure people feel safe and secure in our streets.

- *A Cleaner, Greener Greenwich*

This objective includes measures to "Take action to improve air quality, encourage renewable energy and green choices in the Borough".

4. **Purpose of Report and Executive Summary**

4.1 This addendum report: details responses received to the consultation on the experimental West Greenwich LTN received between 21st December 2021 and the end of the consultation (on 18th February 2022); and makes recommendations for the future of the West Greenwich Low Traffic Neighbourhood (LTN) experimental scheme based on both the information presented here and in the Main Report. The 21st December 2021 date was the latest that allowed the significant volume of 'free text' quantitative data in the consultation responses to be analysed in time to inform the preparation of the Main Report and the EqlA.

4.2 The main 'West Greenwich Low Traffic Neighbourhood experimental scheme' report (referred to in this report as the 'Main Report') can be viewed here:

https://committees.royalgreenwich.gov.uk/Decisions/tabid/67/ctl/ViewCMIS_DecisionDetails/mid/391/Id/1596/Default.aspx.

4.3 This addendum sets out updated information for consideration alongside the other information set out in the Main Report by the Cabinet Member for Environment, Sustainability and Transport in deciding whether to make permanent, withdraw the scheme or introduce an alternative scheme.

4.4 Due to the constrained timetable for the decision on the scheme, described in Section 2 above, the Main Report presented the responses made up to 21st December 2021 (alongside other relevant data therein). This was published separately to (1) meet local government access to information legal

requirements and (2) allow the maximum possible time to consider the consultation responses received at that point and other data presented.

- 4.5 Consultation responses analysed both before and after 21st December were subject to the same assessment process. The updated Equalities Impact Assessment (EqIA) referred to below covers all of the consultation responses as a whole.

5. **Introduction and Background**

- 5.1 The Main Report provides an introduction and explains the background to the scheme. Sections 5 and 9 of the Main Report set out a range of information that should particularly be considered, alongside the latest information presented in Section 9 of this addendum report, in considering the options set out below.

6. **Available Options**

- 6.1 The Main Report set out three options which remain relevant for consideration in light of the latest information presented here. These are:

6.2 Option 1:

To make permanent the West Greenwich LTN, in the form it currently exists (as shown in Figure 2 of the Main Report). This would include the modifications made in August 2021, to:

- i Amend the experimental West Greenwich LTN's hours of operation to reduce pressures on other areas, whilst maintaining many of the benefits of the LTN. This involved 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.
- 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.

6.3 Option 2:

Under this option, the Cabinet Member would need to approve the removal of the West Greenwich LTN (and the return of the streets to how they were before the trial) by allowing the existing experimental TRO to expire on 25 February 2022.

6.4 Restrictions that were in place before the experimental LTN would return into force. This would include HGV restrictions, and the one-way restrictions that were removed from Cade Road and King George Street.

6.5 By way of background information, the Council officers would authorise and make a new Temporary Traffic Regulation Order (TTRO) for a very short period to allow the Council's contractor time for the scheme's removal to be completed safely and the Council to communicate it to stakeholders.

6.6 It is not an option in this report that the Cabinet Members is asked to approve, but the Royal Borough could in the future also develop a new borough-wide transport strategy. If and when this is taken forward, the Transport Strategy would include a policy to develop a borough-wide approach to traffic management. This could include consideration of alternative traffic management for the area covered by the West Greenwich LTN, however, this would require a new TRO that would be considered and decided upon through the usual statutory and Council procedures in due course.

6.7 Any potential traffic management measures that might arise from a borough-wide approach to traffic management measures would need to be developed and consulted on as a separate scheme(s) as discussed above. The current uncertainty regarding Transport for London funding, caused by the pandemic, makes identifying when funding might be available for a borough-wide approach to traffic management uncertain and may further delay any implementation.

Option 3

6.8 Option 3 involves the same as Option 2 as set out in Paragraph 6.3 above, but it is open to the Cabinet Member to authorise Council officers to begin the process of developing an alternative LTN traffic scheme for West Greenwich.

6.9 Under this option Council officers would begin the process of preparing the scheme and publishing and consulting on the proposed scheme under the statutory process for making a permanent TRO. Council officers would work up the details of the proposed alternative scheme in consultation with the Cabinet Member, drawing upon responses and the experience of the existing experimental West Greenwich LTN.

6.10 If following publication and consultation there are significant and substantial or material objections received, Council officers would report the objections and representations received to the Cabinet Member for consideration and a decision as to whether the TRO for the scheme should be made.

7. Preferred Option

7.1 The preferred option is Option 3: to approve the removal of the West Greenwich LTN (and the return of the streets to how they were before the trial) by allowing the existing experimental TRO to expire on 25th February 2022; and the Cabinet Member authorises Council officers to begin the process of developing an alternative LTN traffic scheme for West Greenwich.

8. Reasons for Recommendations

8.1 The response to the consultation and other engagement (including Petitions) set out in Section 9 below, both before and after the August 2021 amendments, suggests a significant level of concern about the scheme. The majority of respondents, in both consultation periods, were not in support of the scheme. Greater support was demonstrated within the West Greenwich LTN area itself.

8.2 Analysis of free text responses to the consultation after the August 2021 amendments suggests this concern is primarily related to potential traffic-related impacts. However, there were also a significant body of responses concerned that the scheme had a negative and unequal impact on residents and their visitors. Comments also suggested a range of potential amendments to the scheme, to address the concerns raised.

8.3 The assessment of traffic effects, summarised in Section 5 of the Main Report, showed benefits within the West Greenwich LTN area in terms of reduced traffic and increased cycling levels. However, it also showed that traffic flows on neighbouring north-south corridors, such as Maze Hill, increased by up to 27% and an increase in bus journey times on weekdays by an average of 7 seconds per bus. Buses also saw an improvement in weekend journey times (by an average of 29 seconds). It is important to note that these effects are not only caused by the LTN, but are also heavily influenced by national and London-wide trends, which show that during the pandemic (and as we begin to emerge from its effects), vehicle usage has been favoured over bus and train travel.

- 8.4 The limited data available since the scheme was implemented limits the ability to fully assess road safety impacts. However, there is no evidence from the data available of an increase in collisions in the LTN area, on boundary roads or in the Maze Hill and Westcombe Park area. There is some evidence in the data that collision numbers have reduced, particularly for collisions with pedestrians and cyclists.
- 8.5 The limited data available since the scheme was implemented also limits the ability to assess air quality impacts. The data that is available to-date from the Council's Blackheath Hill (A2) continuous monitoring site (located close to its junction with Maidenstone Hill) data does not appear to indicate a significant change in the number exceedances in the 12-month period after the scheme was implemented (in September 2020) and results continue to meet objectives set for all pollutants.
- 8.6 The Equality Impact Assessment (EqIA), which forms Appendix A to this report identified a range of benefits and disbenefits in relation to relevant protected characteristics. The scheme is assessed as disproportionately benefitting: those groups who are more reliant on walking (such as the Under 16 and 20-64 age group, as well as Asian or Asian British and White ethnic groups); those who may find some footways particularly difficult to negotiate (such as disabled people or people walking with prams); and those who cycle (predominantly those aged Under 16 and 20-64). Disbenefits are identified for drivers and those who rely on cars: older and/or disabled people and people from certain ethnic groups may be more likely to rely on cars. This may also disproportionately negatively impact carers for disabled and/or older residents, who are more likely to be making regular private vehicle trips through the LTN.
- 8.8 Consideration should also be given to the temporal context to the scheme. 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.
- 8.7 The evidence summarised in the preceding paragraphs, suggests a complex and finely balanced set of impacts arising from the scheme. This is reflected in the polarised response to the consultation, with most respondents giving either strongly positive or strongly negative scores. The reduction in traffic in the LTN area has offered benefits to that area. However, the consultations have also identified significant concerns, there is evidence of increases in traffic at least partly attributable to the scheme, and impacts have been identified on access for certain groups with protected characteristics. Given

the negative impacts and significant concerns identified, it would not be appropriate to make the LTN permanent in the form it currently exists.

- 8.8 Under the Preferred Option (Option 3), Council officers would begin the process of preparing the scheme and publishing and consulting on the proposed scheme under the statutory process for making a permanent TRO. Council officers would work up the details of the proposed alternative scheme in consultation with the Cabinet Member, drawing upon responses and the experience of the existing experimental West Greenwich LTN. This would offer a more equitable approach to managing through traffic in the area. However, it would also help to mitigate the traffic, health and road safety concerns identified about the surrounding road network, and improve the accessibility of the area by car for those who need it.
- 8.12 Option 1, to make permanent the West Greenwich LTN, in the form it currently exists, would fail to address the significant concern and disbenefits identified above. Based on the data collected and summarised here, it would not offer an equitable approach to managing through traffic in the area. It is not recommended for these reasons.
- 8.13 Option 2, to: remove the West Greenwich LTN (and return the streets to how they were before the trial), would fail to address the significant concern about how the streets were before the LTN and would not maintain any of the benefits of the LTN identified above.

9. Consultation Results

- 9.1 This section summarises responses to the engagement on traffic improvements in the West Greenwich LTN area after the August 2021 amendments, incorporating those received between 21st December 2021 and the end of the consultation (on 18th February 2022). Consultation responses analysed both before and after 21st December were subject to the same assessment process. The results of previous engagement on traffic improvements in the West Greenwich LTN area before the August 2021 amendments is summarised in the Main Report and should be considered alongside the responses summarised here.
- 9.2 The Council commissioned an external provider to undertake the analysis of the response to the engagement after the August 2021 amendments. Their report of this analysis forms Appendix A to this report. Key findings identified include:

Key issues raised in the closed questions:

- Overall, more respondents to the consultation objected to the LTN scheme, than supported it (53% vs 45%). Support was greater among those who live in the area directly covered by the scheme (70% support and 28% object). However, it must be recognised that in an online public consultation such as this, the sample is self-selecting and responses are not necessarily reflective of the sentiment of the wider population of the area. Bias in the sample cannot be ruled out and it is important to consider the overall findings in the context of the open-text responses considered later in this chapter.
- After general statements of opposition or support, the most frequently received comments in the consultation survey highlighted concerns around congestion, the displacement of traffic to other parts of the borough, and pollution.
- Generally, there is understanding of why the Council is making modifications to the West Greenwich LTN.
- Feelings about the modifications to the scheme are polarised, with a third of respondents giving a strongly negative score, and a quarter giving strongly positive scores.
- Most respondents supported the changes to allow access for emergency service vehicles, while seven in ten agree with access for refuse vehicles. Half support the changes for black cabs.
- In terms of the changes to the Hyde Vale traffic filter on weekday mornings, support and objection are finely balanced, with just over two fifths objecting (44%), and a slightly smaller share supporting (36%).
- Respondents were more likely to say the changes have affected them negatively than positively in relation to traffic where they live, the speed of their commute and school run, and accessibility of the area.
- The majority perceived an increase in traffic in their street due to the changes.
- Half perceived traffic on Blackheath Hill has increased, while only 3% said it had reduced.

Key issues raised in the open-text question:

- The most mentioned comment was opposition to the scheme, requesting its removal (20% of respondents). Overall support was the next most mentioned comment (16% of responses).
- Concern about congestion on main roads was the next most mentioned topic (14%). Congestion on residential roads was mentioned by 3%, as well as general congestion, not location specific, mentioned by 6%, and longer journeys by 4%.
- Some of the other concerns relating to the scheme included the LTN causing displacement of traffic to other locations in the borough (14%), and the impact on air quality (14%).

- There were also concerns about the impacts on residents, namely that the measure has an unequal impact on residents with different levels of income because of where they live in the borough (7%). Further, the unequal impact is seen across unspecified groups of residents (5%), and a generally negative impact on residents and their visitors (4%).
- Concerns about the consultation process were raised (4%), mainly relating to implementing changes prior to consultation and the choice of questions. There was also a concern about safety from 3% of respondents.
- Several respondents suggested amendments for the scheme, including local resident exemption from measures (9%), introducing similar measures in East Greenwich (8%), or in Greenwich generally (3%), as well as other changes to traffic flow apart instead of the LTN (3%).
- There was also a suggestion to change/ remove the timed restrictions (3%).
- A range of feedback was provided to the public meeting. This is also summarised in Section 4 of Appendix B and includes a number of similar issues to those described above.

9.3 Significant findings identified in the analysis summarised above, that differ from the analysis presented in the Main Report, can be summarised as:

- The balance of overall support for and objections to the scheme became closer: with 53% objecting and 45% supporting. This is compared to 62% objecting and 35% supporting in the December results in the Main Report.
- Among those who live in the area directly covered by the scheme 70% supported the scheme and 28% objected. This is a slight increase in support compared to the December results in the Main Report (61% supported and 37% objected).
- There were small changes in the exact proportions of respondents making a range of responses but these were generally relatively small. Amongst the more significant changes were:
 - In terms of the changes to the Hyde Vale traffic filter on weekday mornings, 44% objected and 36% supported. Whilst still fairly balanced, these proportions were even more balanced in the December results in the Main Report.
 - The proportion of respondents that believed believe that there is increased traffic on Blackheath Hill decreased from 59% in the December results in the Main Report to 50%.

9.4 A further petition, in addition to those included in the Main Report, was presented to the meeting of the Council on 26th January. The petition contained 422 signatures and was titled “A *petition to Greenwich Council to listen*

to US and stop the West Greenwich ‘low traffic neighbourhood’”. The petition was still in the process of being considered by the Highways Committee and reported back to Council at the time of writing. However, it is included here to be considered by the decision maker alongside the other feedback presented.

- 9.5 The key and main issues included in the petition correspond with those set out in relation to previous petitions in Table 6 of the Main Report.

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

- 10.1 The decision made pursuant to this report will be published on the Council’s website and the relevant webpage content will also be updated accordingly to reflect the decision made.
- 10.2 The preferred option is Option 3: to approve the removal of the West Greenwich LTN (and the return of the streets to how they were before the trial) by allowing the existing Experimental TRO to expire on 25th February 2022; and the Cabinet Member authorises Council officers to begin the process of developing an alternative LTN traffic scheme for West Greenwich. Restrictions that were in place before the experimental LTN would return into force unless and until a new TRO was made in the future. This would include HGV restrictions, and the one-way restrictions that were removed from Cade Road and King George Street.
- 10.3 By way of background information, the Council officers would authorise and make a new Temporary Traffic Regulation Order for a very short period. This would allow the Council’s contractor time to safely remove the scheme and the Council to communicate its removal to stakeholders.
- 10.4 Under the Preferred Option (Option 3), Council officers would begin the process of preparing the scheme and publishing and consulting on the proposed scheme under the statutory process for making a permanent TRO. Council officers would work up the details of the proposed alternative scheme in consultation with the Cabinet Member, drawing upon responses and the experience of the existing experimental West Greenwich LTN.
- 10.5 If following publication and consultation, there are significant and substantial or material objections received, Council officers would report the objections and representations received to the Cabinet Member for consideration and a decision as to whether the TRO for the scheme should be made.

10.6 The Equality Impact Assessment (EqIA), which forms Appendix A to this report, includes a number of recommendations that should be considered in the development of the Preferred Option (Option 3).

11 Cross-Cutting Issues and Implications

Issue	Implications	Sign-off
Legal including Human Rights Act	The issues were addressed in the Main Report and the comments there remain applicable.	John Scarborough, Director of Legal & HR, 21 February 2022
Finance and other resources	<p>The Cabinet Member for Environment, Sustainability & Transport is requested to note the additional engagement results from the West Greenwich Low Traffic Neighbourhood (LTN) consultation between 21st December 2021 and the end of the consultation (on 18th February 2022) and to consider the new findings arising from responses after 21st December 2021 alongside the other information presented the main 'West Greenwich Low Traffic Neighbourhood experimental scheme' report (referred to as the 'Main Report') in considering the options set out in this report.</p> <p>The Cabinet Member is requested to approve Option 3, the removal of the West Greenwich LTN and to authorise Council Officers to begin the process of developing an alternative LTN traffic scheme for West Greenwich.</p> <p>The removal of this scheme is estimated to cost £27,500. Enforcement measures for this scheme include the provision of cameras, which to date have generated £474,295 of Penalty Charge Notice income. The estimated cost of removing the scheme will be funded from Penalty Charge Notice income.</p>	Sue Rock Accountancy Business Change Manager 21/02/2022

	<p>Any future scheme would be subject to a further report.</p> <p>Any surplus income received from this scheme or any future scheme will be applied in accordance with the relevant legislation regarding transport PCNs</p>	
Equalities	<p>Decision-makers are reminded of the requirement under the Public Sector Equality Duty (s149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups.</p> <p>The decisions recommended through this paper could directly impact on end users. The impact has been analysed and varies between groups of people. The results of this analysis are immediately below. Further information is also available in the updated Equality Impact Assessment (EqIA) attached at Appendix A. These impacts are also included in Paragraph 8.6 within the 'Reasons for recommendation' section of this report and in the text of the Main Report.</p> <p>The updated EqIA, which forms Appendix A to this report, identified a range of benefits and disbenefits in relation to relevant protected characteristics. The scheme is assessed as disproportionately benefitting: those groups who are more reliant on walking (such as the Under 16 and 20-64 age group, as well as Asian or Asian British and White ethnic groups); those who may find some footways particularly difficult to negotiate (such as disabled people or people walking with prams); and those who cycle (predominantly those aged Under 16 and</p>	<p>Ryan Bunce</p> <p>Transport Strategy Manager</p> <p>21st February 2022</p>

	<p>20-64). Disbenefits are identified for drivers and those who rely on cars: older and/or disabled people and people from certain ethnic groups may be more likely to rely on cars. This may also disproportionately negatively impact carers for disabled and/or older residents, who are more likely to be making regular trips through the LTN.</p> <p>The decision proposed would relate to the Council’s Equality and Equity Charter and the Council’s Equality Objectives 2020-2024 commitment to “<i>creating a fairer borough through promoting inclusion, participation and equal access</i>”.</p>	
<p>Climate change</p>	<p>The report considers options that would relate to the commitment to “Create new and improve existing cycle network infrastructure and walking routes” made in the Greenwich Carbon Neutral Plan, in line with the Carbon Neutral Plan commitment.</p> <p>Under the Preferred Option (Option 3), the Cabinet Member would authorise Council officers to begin the process of developing an alternative LTN traffic scheme for West Greenwich. This could offer a more equitable approach to managing through traffic in the area and provide some of the type of benefits offered by the experimental LTN to walking and cycling.</p> <p>This would improve the walking and cycling environment, encouraging more sustainable travel to, from and through the area – in line with the Carbon Neutral Plan commitment and the Greenwich Carbon Neutral Plan.</p>	<p>Ryan Bunce Transport Strategy Manager 21st February 2022</p>

12. **Report Appendices**

Appendix A: Analysis of the results of engagement on traffic improvements in the West Greenwich LTN area: incorporating responses after 21st December 2021.
Appendix B: Updated Equality Impact Assessment.

13. **Background Papers**

None.

Report Author: Ryan Bunce
Job Title: Transport Strategy Manager
Tel: 020 8921 8023
Email: ryan.bunce@royalgreenwich.gov.uk

Reporting to: Ryan Nibbs
Job Title: Assistant Director, Transport
Tel: 020 8921 3696 2397
Email: ryan.nibbs@royalgreenwich.gov.uk

Chief Officer: Mirsad Bakalovic
Job Title: Director of Communities, Environment & Central
Tel: 020 8921 6432
Email: mirsad.bakalovic@royalgreenwich.gov.uk