

DECISION MAKER Cabinet Member for Environment, Sustainability & Transport	DATE: 28 January 2022
TITLE Westcombe Park and Maze Hill Area Low Traffic Neighbourhood proposal: consultation update and next steps	WARD(S) Blackheath Westcombe, Greenwich West and Charlton, and Peninsula
CHIEF OFFICER Director of Communities, Environment and Central	CABINET MEMBER Environment, Sustainability & Transport
DECISION CLASSIFICATION Key, entered onto Forward Plan 4 th October 2021. Subject to call in. Non-Exempt.	IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING? Yes

I. Decision Required

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

- I.1 To note and consider the representations received in response to the consultation undertaken by the Council in respect of proposals for the Westcombe Park and Maze Hill area Low Traffic Neighbourhood Scheme.
- I.2 Not to implement the scheme for the reasons set out in paragraph 7 of the report.
- I.3 To continue the monitoring of traffic levels in the area.
- I.4 To explore the scope for more appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill.
- I.5 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.....
Councillor Sarah Merrill, Cabinet Member for Environment, Sustainability & Transport

2. Links to the Royal Greenwich high level objectives

2.1 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".

3. Purpose of Report and Executive Summary

3.1 This report considers responses received following engagement and consultation on proposals for a Low Traffic Neighbourhood (LTN) scheme covering the Westcombe Park and Maze Hill area.

3.2 In summary, the report details the engagement approach, responses received, and recommendations relating to the proposed scheme, for consideration by the Cabinet Member for Environment, Sustainability & Transport

4. Introduction and Background

4.1 The intention of LTNs is 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.

- 4.2 An on-line consultation platform known as CommonPlace was used to consult on the Westcombe Park and Maze Hill area LTN proposals between 5 February 2021 and 8 March 2021.
- 4.3 This platform allowed residents, other stakeholders and statutory consultees to provide feedback on the proposals and indicate preferences on the operation of the scheme, in terms of time and day of operation, as well as their preferred method of enforcement. This consultation is summarised further in Section 8 of this report. The hard copy version of the consultation document is reproduced as Appendix B of this report.
- 4.4 Following feedback from some residents, improvements have already been made in Vanbrugh Hill which consist of extra regulatory signs, warning signs and road markings to deter overtaking, as well as an increased amount of 20mph warning signs/road markings to reinforce the speed limit.
- 4.5 Officers are also exploring the option to provide a formal pedestrian crossing in Vanbrugh Hill, to provide a safer crossing point for pedestrians as well as reducing the speed of vehicles. As an interim measure minor works to improve existing infrastructure, including tactile crossings and the removal of street furniture as well as narrowing of junctions to improve pedestrian safety, have taken place.

5. Available Options

- 5.1 The options available following the analysis of comments received for the scheme are to:
- 5.2 Option 1 - Proceed with the scheme proposals outlined in the initial engagement.
- 5.2 Option 2 - not proceed with the scheme proposals outlined in the initial engagement, and explore the scope for more appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill. To continue the monitoring of traffic levels in the area.

6. Preferred Option

- 6.1 The preferred option is Option 2, not proceed with the scheme proposals outlined in the initial engagement, and explore the scope for more

appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill. To continue the monitoring of traffic levels in the area.

7. Reasons for Recommendations

- 7.1 The response to the consultation and other engagement (including Petitions) set out in Section 8 below, suggests a significant level of concern about the scheme. Analysis of free text responses suggests this concern is primarily related to:
- potential traffic-related impacts; and
 - the potential for exemptions, for residents and/or groups with specific needs.
- 7.2 Having analysed the consultation responses, officers consider that appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill would potentially address specific issues on those roads identified during the consultation, including inappropriate HGV traffic.
- 7.3 The most frequent concerns raised within the consultation comments include:
- Displacement of traffic and pollution onto main roads
 - Cutting off or causing longer journeys to local amenities/services
 - Displacement of traffic and pollution onto other local roads
- 7.4 Continuing to monitor traffic levels would allow the Council to assess the impact of external changes on streets in the area, in particular, the effect of changes to the road network in neighbouring areas and changes to travel patterns due to the Pandemic and subsequent recovery. Any traffic management that might be considered in the future, as a result of monitoring, would be brought forward as a new proposal.
- 7.5 The consultation undertaken by the Council provided important information about the local community's views, to consider alongside the other factors set out in this report. Officers' recommendations, as set out in this report, seek to balance this difficult range of views and other issues relevant to the proposals, after careful consideration, while recognising that it is for the decision-maker in this case to carefully consider and weigh up these range of views and other issues in making their decision to proceed with either Option 1 or Option 2 as set out in this report.

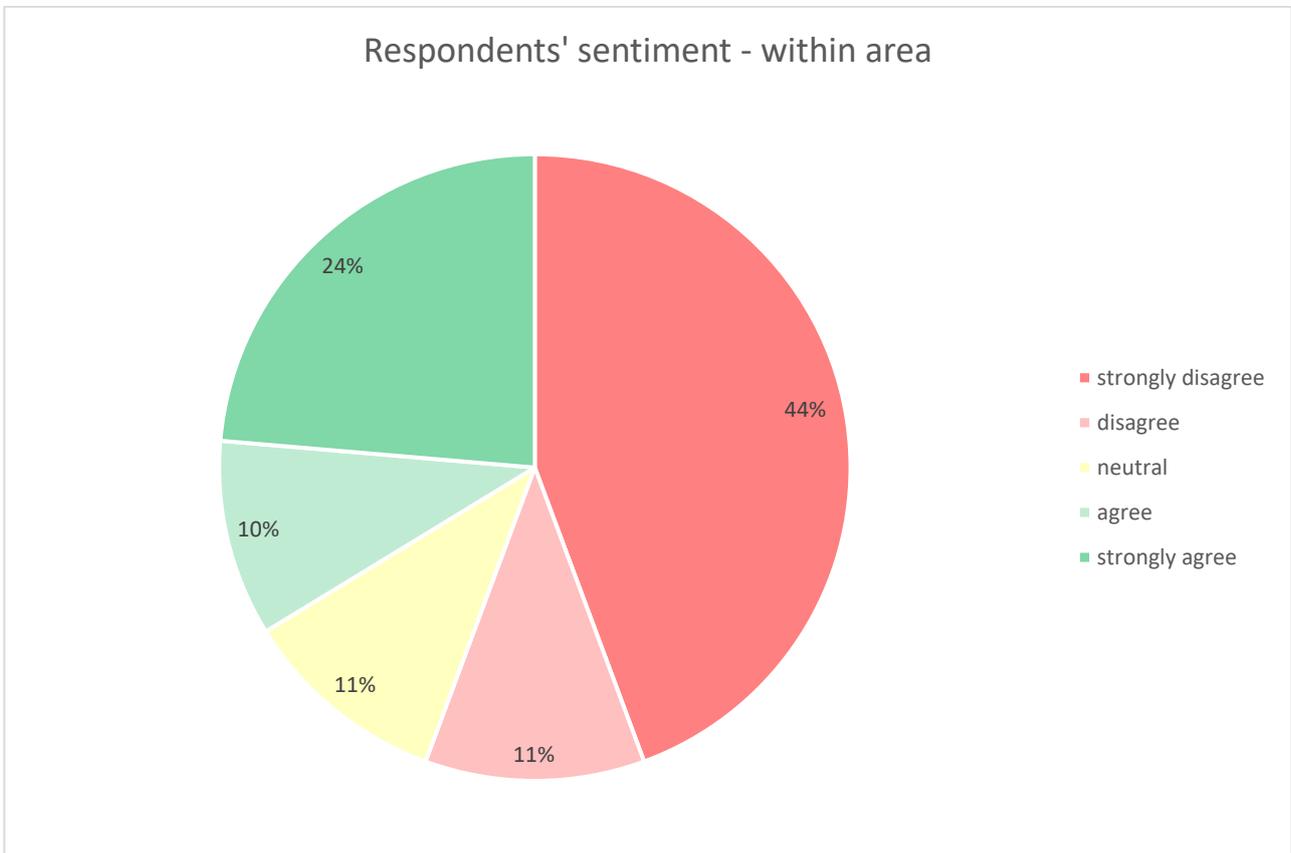
8. Consultation Results

- 8.1 Consultation on a Low Traffic Neighbourhood (LTN) in the Westcombe Park and Maze Hill Area took place between 5th February and 8th March 2021. A letter, with an accompanying map, was sent to 6,000 addresses. Residents were asked to complete the survey online via the Commonplace consultation website. The consultation asked residents for their views on four proposed modal filters. They were asked if they thought levels of through traffic had increased in their area, if the modal filters were in right locations, what times they thought cameras should operate from, and questions about the modes of transport they use and how they thought a LTN could be of benefit. Feedback showed significant levels of opposition expressed. Fifty five per cent (55%) of respondents within the area disagreed or strongly disagreed with the proposals as shown in the table below.
- 8.2 3,063 comments were received through the CommonPlace system¹. 2,267 (74%) of these were from within the scheme area.

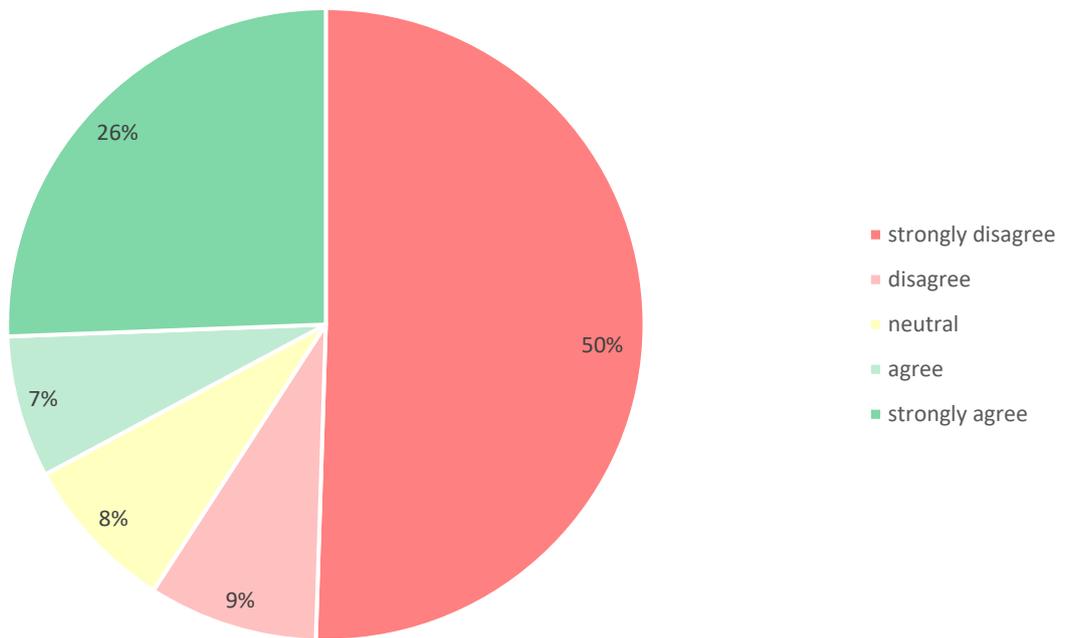
¹ This figure is slightly lower than readers may see on the Commonplace portal, as our dataset has been cleansed to remove things like blank responses, which the website automatically counts.

8.3 Respondents' sentiments are shown in the table and pie charts below:

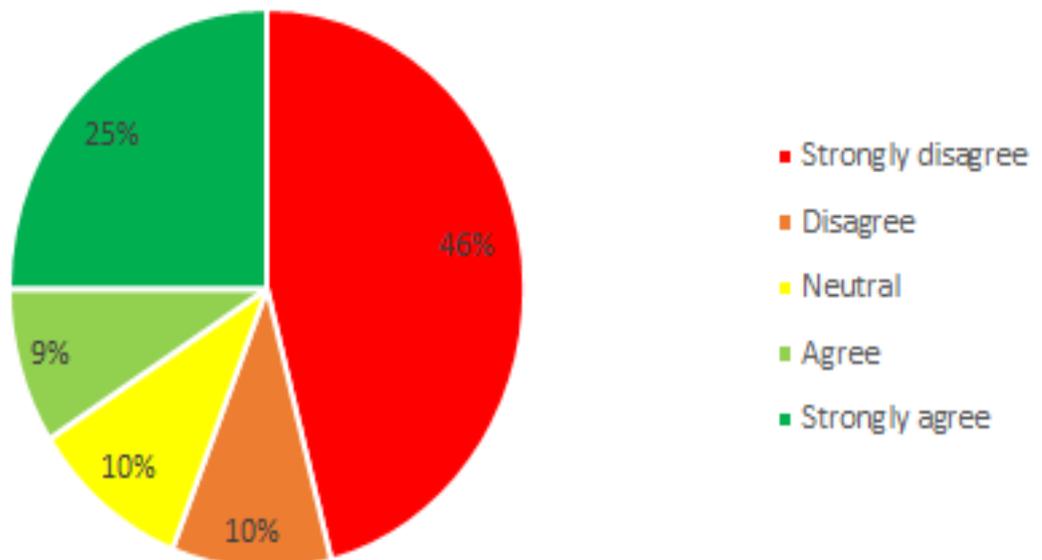
Response location	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
Within area	24%	10%	11%	11%	44%
Outside area	26%	7%	8%	9%	50%
All areas	25%	9%	10%	10%	46%



Respondents' sentiment - outside area



Repondents' sentiment - All Areas



8.4 Free text comments from the survey were analysed to identify common themes within the comments. The themes identified are listed in the following table, showing negative and then positive comments. The comments can be viewed in full from the following webpage: [Have Your Say Today – Westcombe Park And Maze Hill Area Low Traffic Neighbourhood – Commonplace](#).

Theme	Frequency of comments
Negative comments:	
Displacement of traffic and pollution onto main roads	609
Cutting off or causing longer journeys to local amenities/services	469
Displacement of traffic and pollution onto other local roads	382
Recent traffic increase related to filters in West Greenwich and elsewhere	270
Request for resident permits/exemptions	255
Concerns about new cycle lanes on lower roads	254
Concerns about disabled/elderly: exemptions for blue badge/taxi card holders	230
Concerns about people that use cars for work: health visitors, trades people, deliveries	150
Concerns that proposals favour more affluent areas / cause segregation	137
Delays to emergency services	91
Cameras are for revenue raising	71
New developments have increased traffic, especially retail and residential development	66
Concerns about residents that need cars for work or to commute	57
Concern about changes to/removal of bus lanes	39
Hills are too steep to walk or cycle for many	23
Silvertown tunnel will make matters worse	21
Use speed cameras or traffic calming to slow traffic, instead of or as well as closures	20

Stop lorries and large vehicles	17
These are main/access roads not residential	15
Belief that closures are illegal	15
Charlton/east of Blackwall Tunnel Southern Approach should be an LTN too	14
Permits/exemptions for electric/hybrid cars	9
Coaches/buses should be banned	9
Add more clear cycle paths and make sure filters are wide enough for cargo bikes	6
Reopen route through park for commuters to use	6
Discriminates against women	6
Positive comments:	
Welcome modal filters / bus gates	106
Non-specific message of support	87
Makes roads safer, inc. for children travelling to and from local schools	69
Need to reduce car use in area	62
Would improve quality of life, health and wellbeing of residents	55
Through traffic needs to be reduced	55
Would improve air quality	53
Would reduce traffic	42
Support closures but should be time limited, to peak times	29
Need to improve air quality	28
Would make area more cycle and pedestrian friendly	17
Maze Hill filter would allow a useful cycle route down toward Cutty Sark when the park is closed	1

- 8.5 The table above shows the range and number of comments related to increased traffic (and impacts of increased traffic, such as pollution). Concerns about the displacement of traffic, increased trip lengths and other traffic-related issues combine to make up over half of the comments made. A significant body of comments also relate to the potential for exemptions: for residents and/or groups with specific needs. A wider range of themes are identified in the positive comments, and they tend to be made by fewer respondents.
- 8.6 These key and main issues arising from the representations are set out in the table below, with a summary of the response to them:

Issue	Response
Concerns about the displacement of traffic, increased trip lengths and other traffic-related issues.	The preferred option recommended would avoid these issues.
The potential for exempting residents and/or groups with specific needs from the LTN restrictions.	The preferred option recommended would avoid these issues.
Concerns about the impact of traffic levels in the area.	The preferred option recommended incorporates exploring more appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill which would help to address these issues.

8.7 Petitions

- 8.8 A petition containing 536 signatures, against the implementation of a LTN in the Westcombe Park and Maze Hill area was presented to the meeting of Full Council on 25 February 2021. This petition was considered by the July 2021 Highways Committee and reported to the Full Council meeting of 21 July 2021.
- 8.9 A second petition containing 176 signatures was also presented to the meeting of Full Council on 25 February 2021 and considered by the Highways Committee meeting of July 2021. The petition requested that consideration be given to using number plate recognition technology to allow a resident exemption for camera enforced closures proposed as part of a proposed low traffic neighbourhood in the Westcombe Park and Maze Hill area

8.10 A third petition calling for the use of a camera enforced closure, instead of a fixed closure of Halstow Road, as part of the proposals for the Westcombe Park and Maze Hill area LTN was considered by the July Highways Committee and referred to the 21 July Full Council meeting.

8.11 Details of the petitions and the recommendations made can be found at the following links:

- Highways Committee meeting of July 2021
[Document.ashx \(royalgreenwich.gov.uk\)](#)
- Full Council Meeting of 21 July 2021
[CMIS > Calendar of Meetings \(royalgreenwich.gov.uk\)](#)

8.12 The petitions included the following key and main issues:

Issue	Response
Concerns about congestion, increased trip lengths and other traffic-related issues.	The preferred option recommended would avoid these issues.
The potential for exempting residents from the LTN restrictions	The preferred option recommended would avoid these issues.
The use of a camera enforced closure instead of a fixed closure of Halstow Road, allowing it to operate on a timed basis as proposed for other closures.	The preferred option recommended would avoid this issue.

8.13 A number of petitions relating to the West Greenwich LTN were also presented to the Council (five supporting the West Greenwich LTN and four against). These petitions are summarised in the decision report “[West Greenwich Traffic Reduction Scheme - Modifications to the West Greenwich LTN](#)”. That report identifies “*Diversion of traffic to other areas, especially the Maze Hill and Westcombe Park area*” as a key and main issue in relation to that scheme. In response to this (and other relevant considerations) the decision resulted in amendments to the West Greenwich LTN to allow vehicular access through a camera enforced modal filter on Hyde Vale, between 7am and 9am Monday to Friday (and to exempt taxis and refuse

vehicles from the camera enforced modal filters). The report noted the amendment would:

“...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.”

8.14 Emergency Services

8.15 The emergency services all support the aims and objectives of schemes that are designed to reduce traffic and improve air quality. We have 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.

8.16 Road casualty data

8.17 In consultation feedback and other communications, concerns were raised that people felt road danger had increased in the Westcombe Park and Maze Hill area. It is not possible to do a full analysis with the data available to-date (we would usually compare three years post-implementation data with the three years pre-implementation).

8.18 The most recent collision data that is available for the Maze Hill and Westcombe Park area (1st July 2020 to 30th June 2021) was compared with the same period in the four previous years. The data does not indicate a significant change in the number or distribution of collisions that caused injuries in the Westcombe Park and Maze Hill area in the most recent periods for which data is available. A summary of this analysis can be found at Appendix A of this report.

8.19 West Greenwich Low Traffic Neighbourhood public meetings

8.20 Two public meetings were held at the University of Greenwich on 23rd September 2021, as part of the ongoing public consultation on the experimental West Greenwich LTN. The meetings allowed the decision maker to listen to stakeholders views and for stakeholders to hear each other's views. Diversion of traffic by the scheme to other areas, especially the

Maze Hill and Westcombe Park area, was an issue raised by a number of speakers.

- 8.21 Notwithstanding the issues raised at the public meetings held on 23rd September 2021 which suggest a link between the West Greenwich LTN and the Westcombe Park and Maze Hill LTN – for example the diversion of traffic by the West Greenwich LTN scheme to the Maze Hill and Westcombe Park area (see paragraph 8.22 above) - it should be noted that any decision made pursuant to this report does not represent any decision made in respect of the West Greenwich LTN, which will be the subject of a separate decision report in due course.

9 Next Steps: Communication and Implementation of the Decision

- 9.1 The decision made pursuant to this report will be published on the Council's website and the Westcombe Park and Maze Hill Low Traffic Neighbourhood webpage content will also be updated accordingly to reflect the decision made.
- 9.2 If the Preferred Option is selected (not to proceed with the scheme proposals outlined in the initial engagement), the next step would be explore the scope for more appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill.

Long-Term Strategy

- 9.3 It is proposed that the Council develops a borough-wide, over-arching Sustainable Transport Strategy, building on the strategy set out in its Local Implementation Plan for transport, Carbon Neutral Plan and other documents. It would seek to provide a joined-up approach to the following issues:

- Vision Zero (casualty reduction) schemes
- Speed management schemes
- Freight management
- Behaviour change
- Public transport improvements
- Cycling schemes
- Walking schemes
- Cycling schemes
- Traffic reduction schemes

10. Cross-Cutting Issues and Implications

Issue	Implications	Sign-off
<p>Legal including Human Rights Act</p>	<p>LTNs are made as traffic regulation orders under the Road Traffic Regulation Act 1984 (RTRA 1984), which could be either an experimental or permanent order in this instance.</p> <p>As part of that process, there is an opportunity for the public and stakeholders to make representations and objections. Under the Council's Constitution they would need to be considered by the Cabinet Member if any significant and substantial or material objections are received.</p> <p>Although Option 2 is recommended, if the Cabinet Member decided upon Option 1 (proceed with the scheme proposals outlined in the initial engagement), the Cabinet Member would also need to consider the Council's duty in S122 of the RTRA 1984 when exercising powers under the Act to exercise its functions (so far as practicable) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway, including a number of particular matters set out in the provision.</p> <p>Similarly, it is considered that a decision to leave the highway and traffic regulation as recommended would not interfere with human rights. It would result in no change from the status quo.</p>	<p>Eleanor Penn, Assistant Head of Legal Services (Planning & Procurement), 17th January 2022</p>

	<p>Were there to be any interference with human rights from traffic management measures, it is open to the Cabinet Member to conclude that it is proportionate and necessary in the circumstances. The Cabinet Member should consider that issue should Option I be decided upon.</p>	
<p>Finance and other resources</p>	<p>The Cabinet Member for Environment, Sustainability & Transport is requested to note and consider the responses received to the proposals for the Westcombe Park and Maze Hill area Low Traffic Neighbourhood Scheme as set out in the report, and to agree not to implement the scheme as consulted in view of the responses and pending the outcome of the traffic modelling work currently being undertaken. This work is being funded from LIP funding already allocated by TfL. If the preferred option is agreed, a further decision on the future of the proposals would be required to be made by the Cabinet Member, considering this further analysis.</p>	<p>Sue Rock Accountancy Business Change Manager 05/01/22</p>
<p>Equalities</p>	<p>The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no apparent equality impact on end users.</p> <p>Any future decision taken as a result of exploring the scope for appropriate traffic calming measures (as proposed in the preferred option) would need to consider its relevance to the requirement under the Public Sector Equality Duty (s149 of the Equality Act</p>	<p>Ryan Bunce, Transport Strategy Manager. 26.11.21</p>

	<p>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 recommendation made in this report is not to proceed with the scheme proposals outlined in the initial engagement. It is also recommended that the Council explore the scope for appropriate traffic calming measures . If the decision made follows the recommendation, then the results of the investigation into appropriate traffic calming measures (and the Council’s wider transport strategy) will be considered in the light of the Council’s Equality and Equity Charter and the Council’s Equality Objectives 2020-2024.</p>	
<p>Climate change</p>	<p>The displacement of traffic on surrounding road network does not align with the Royal Borough’s Carbon Neutral Plan. The preferred option recommended through this paper is not to implement the scheme as consulted on. This is likely to have remote or low relevance to the Royal Borough’s Carbon Neutral Plan.</p> <p>The preferred option also includes exploring the scope for more appropriate traffic calming measures on Maze Hill, Vanbrugh Hill and Westcombe Hill. This is likely to have some positive effect on issues identified in the Carbon Neutral Plan:</p>	<p>Ryan Bunce, Transport Strategy Manager. 26.11.21</p>

	<ul style="list-style-type: none"> • enabling safe walking and cycling for people of all ages by reducing traffic and reliance on private cars; • addressing safety issues caused by large volumes of vehicles using streets in the area; and • supporting public health, improve local air quality, and reduce noise pollution. 	
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10. Report Appendices

Appendix A – Road casualty data.

Appendix B – Hard copy consultation questionnaire.

11. Background Papers

None

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