



THE WESTCOMBE SOCIETY
serving the Westcombe Park community

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**Westcombe Society comments on West and East Greenwich
neighbourhood management project – stage 2 consultation**

The Westcombe Society is an amenity society that exists to improve the environment for those who live or work in Westcombe Park (the area bounded by the Greenwich Railway line, Maze Hill, the A2 and the A102).

The Westcombe Society supports the vision in the Council's overall Traffic Strategy, and we welcome the opportunity to contribute to the consultation on potential traffic management for East /West Greenwich neighbourhoods.

Importantly, we feel that any solutions must be looked at strategically and based on area-wide traffic flow data.

Our responses on the following pages follow the format of the online Consultation.

Design Proposals for East Greenwich – Option A

The Westcombe Society **strongly opposes Option A.**

Traffic Flows

Our concerns are:

- Although Option A may reduce traffic flow on some roads, traffic is likely to **increase** on others, in particular at the southern end of roads running north/south in the Westcombe Park area. This is because all local traffic will have to exit to the south. The baseline traffic study notes that some of these roads have quite high traffic flows already and not all of this is through traffic.

- Displaced traffic, both local and from further afield, will have to find alternative routes which will result in
 - heavier traffic on other residential roads outside the East and West Greenwich LTNs, many of which are residential and are already congested e.g. Blackheath Hill, Greenwich South Street, Greenwich High Road, the West Greenwich one-way system, Trafalgar Road, Woolwich Road, the Angerstein roundabout, the A2 (Shooters Hill Road) and residential roads on the Charlton Slopes.
 - longer journey times resulting in an increase in fuel consumption and pollution on roads outside the LTN area.

Improvements in one area should not be at the significant expense of others. We therefore consider it unacceptable to divert traffic onto residential main roads that already have high levels of pollution and congestion.

Traffic Speeds

As stated in the baseline traffic study, the Westcombe Park area suffers from speeding on some roads despite a 20mph speed limit and speed humps. In our view it is unlikely that removing traffic will make the remaining traffic less likely to travel at speed. We would expect the contrary.

Walking, wheeling and cycling

Westcombe Park is characterised by having very steep hills. The baseline traffic study highlights the inequalities in public transport provision in some parts of Westcombe Park but fails to observe that many of the amenities/shops that residents use are on Greenwich Peninsula and Charlton Riverside. There are no direct bus services to the Charlton Riverside shopping area from anywhere in Westcombe Park. Depending where one lives in Westcombe Park such a journey entails two or three buses or a long walk down and then back up the hill. Walking and/or cycling up and down the hill with luggage or shopping simply isn't an achievable option for many residents, so journeys by car are unsurprising.

Some residents live on one side of the railway line but have work, caring, or other responsibilities on the other side. Without adequate public transport they will be severely inconvenienced by Option A.

Both Westcombe Park and Maze Hill stations have good, almost step-free connections to central London, three London airports and many of the London railway termini. However, neither station has a lift which means there is no direct step-free access between platforms. Although there are bus services on Westcombe Hill and the Woolwich Road, these are not adjacent to the stations and do not serve the whole area. The use of a car or minicab for journeys to and from the station is therefore a necessity for many residents, especially those with luggage. Removing north-south vehicular access across the railway at all points would mean that residents must make a long diversion to access both platforms by car. This will be seriously detrimental to those who use rail transport but cannot walk, climb steps and/or carry luggage to or from their homes.

Road safety

A reduction in traffic may improve road safety. However, unless speed is reduced there may be no significant improvement in Westcombe Park overall. We are also concerned that an increase in traffic on main roads may reduce safety and increase the likelihood of injury to cyclists and pedestrians, despite cycle lanes on some main roads.

Air pollution

Westcombe Park residents already enjoy less air pollution than those who live on the surrounding main roads. It is unacceptable to worsen pollution for residents on those roads.

Noise

Displacement of traffic may simply shift noise, so one road might gain at the expense of another.

People's health

As with air pollution, some will gain while others lose. There may be no significant overall gain from option A.

Further comments on option A

We consider option A to be even more draconian, complex and restrictive than the highly unpopular proposal for a Westcombe Park/East Greenwich LTN in 2021. We wish to make the following further points with respect to Option A:

- It was clear in 2021 and in the baseline traffic study that the problem exists mainly in the peak hours. Why is there no option in the proposal for peak hour restrictions only?
- The baseline traffic study also shows that a significant proportion of traffic is 'out-out' trips i.e. through traffic. The emphasis should therefore be on the removal of through traffic during peak hours as opposed to all traffic at all times. This should result in a significant improvement with a far less adverse impact on residents both within Westcombe Park/East Greenwich and in surrounding areas.
- Option A includes a proposal to close Maze Hill between Gibb Memorial and Shooter's Hill Road. This will have a knock-on effect on both parking and traffic flow –
 - Sunday visitors to Greenwich Park use the yellow line on this stretch of road to park. Any removal of parking may have a knock-on effect on residential areas.
 - If this section of road is closed, the light sequence at the Gibb Memorial traffic lights should be changed to ease congestion. If the sequence were changed such that northbound traffic from Prince Charles Road followed the East/West traffic from Charlton Way this would give time for the buses to clear the bus stop before the southbound traffic from Maze Hill moved. The Westcombe Society has been asking for this change for many years; it will be essential if the southern end of Maze Hill is closed.

Design proposals for East Greenwich Option B

The Westcombe Society **strongly opposes Option B**.

Traffic flows

We are concerned that Option B will result in increased traffic on Vanbrugh Hill northbound, Westcombe Hill southbound, and Humber Road. There is likely to also be a corresponding increase on other north/south roads in the area and on the Woolwich Road and Westcombe Park Road.

It is likely that there would be similar changes around St John's Park as traffic seeks to work round the one-way systems. In particular traffic might start to use Langton Way which is an unadopted road and not suitable for additional traffic

Traffic Speeds

We fear that there will be no reduction in speed and a risk of an increase in some roads. We wonder how traffic engineers propose to control the speed of traffic on one-way streets, especially Vanbrugh Hill.

Walking, wheeling and cycling in the area

As stated in our response to Option A, Westcombe Park is characterised by having very steep hills. The baseline traffic study highlights the inequalities in public transport provision in some parts of Westcombe Park but fails to observe that many of the amenities/shops that residents use are on Greenwich Peninsula and Charlton Riverside. Walking and/or cycling up and down the hill with luggage or shopping simply isn't an achievable option for many residents, therefore we do not expect a significant change if Option B were introduced.

Road safety

Option B does not stop traffic passing through the area, therefore we don't expect an increase in road safety. On the contrary the temptation to speed on one-way streets might result in reduced road safety.

Air pollution

Option B does not prevent through traffic therefore we do not expect it would result in an overall reduction in air pollution. Some roads may improve but others are likely to suffer.

Noise

We would expect option B to result in a shift in traffic, so one road might gain noise at the expense of another.

People's health

As with air pollution, some will gain while others lose. Any significant overall gain seems unlikely.

Further comments on option B

- There would be little traffic on Maze Hill and the roads to the north of Halstow railway bridge, but the displacement to other roads would be significant and unacceptable. Option B will also inconvenience residents by necessitating longer journeys so the benefits to a few will be outweighed by the disbenefit to others.
- It is unclear what the purpose is in making St John's Park one-way. It is unacceptable to risk traffic diverting onto the unadopted Langton Way
- It is unclear what the purpose is in a modal filter at the junction of Westcombe Park Road and Vanbrugh Hill. This would prevent residents to the west of the filter driving to Blackheath Standard which is a necessity for those less able to walk.

Camera enforcement

We recognise the flexibility of camera enforcement. However, restrictions should be well-signposted so that drivers do not accidentally incur fines.

Exemptions

The Westcombe Society:

- strongly supports exemptions for emergency vehicles. However, if approach roads are congested, then the emergency vehicles will be delayed. Even now, emergency vehicles become stuck on the Woolwich Road due to traffic at a standstill.
- strongly supports exemptions for blue badge holders who live in the area. However, at minimum, this should be extended to also include blue badge holders who work or study in the LTN area or nearby, and for whom the shortest route from home to their place of work or study is through the LTN.
- considers that an exemption for black cabs but no other form of taxi gives an unfair advantage to black cabs.
- notes that other exemptions are technically possible and are used in some other Boroughs. Exemption should be considered for residents of the area. This would negate the negative effect of residents having to make longer journeys via, and thus polluting, other residential areas. Also, discouragement to drive should be by the carrot of good public transport, especially on the hills, as opposed to the stick of restrictions.

Further comments on Options A and B for East Greenwich/Westcombe Park.

a) Options should not be implemented without a majority of residents in favour of the option chosen.

b) Changes in East Greenwich/Westcombe Park and West Greenwich would need to be compatible i.e. West Greenwich should not 'go it alone' as this would have significant negative knock-on impacts on East Greenwich/Westcombe Park (and vice versa). Therefore new traffic schemes should only be implemented if residents in **both** East Greenwich/Westcombe Park and West Greenwich are in favour of changes to their area.

In summary, for East Greenwich/Westcombe Park:

- **Options A and B are both wholly unacceptable.**
- 24h restrictions seven days/week are unnecessary. Most of the problem is attributable to through traffic during the morning and evening rush hours. Any restrictions should therefore focus on rush hour traffic.
- Residents currently making short, local journeys will be required to make longer, convoluted journeys, both on residential roads within the LTN and on already-congested main roads, resulting in increased fuel consumption and further pollution on roads outside the LTN.
- Main roads already suffer worse pollution and congestion than any roads within the proposed LTN. It is therefore unacceptable that people, often the most disadvantaged, who live on main roads should suffer further pollution, noise, and ill-health due to traffic diverting from the LTN.
- Car usage is unlikely to reduce unless appropriate public transport options are created, especially to the Greenwich Peninsula and Charlton Riverside.

- The steep hills prevent many from cycling or walking, especially with shopping or luggage. Lack of public transport in some parts of the area mean there is a lack of alternatives.
- Most of the problem is attributable to 'out-out' through traffic. If an LTN is introduced, consideration should be given to exemptions for local residents to reduce the knock-on effect on roads outside the LTN.
- It is unacceptable that traffic should be diverted from Maze Hill and Halstow Road and neighbouring roads onto Humber Road, Vanbrugh Hill, Westcombe Hill and the Woolwich Road thus increasing congestion and pollution on those roads. (Option B)
- It is unacceptable that traffic should be diverted onto Langton Way (an unadopted road) due to the introduction of a one-way system in St John's Park (Option B)
- Changes should not be made unless residents in **both** East Greenwich/Westcombe Park and West Greenwich are in agreement with the changes in their area. This is to avoid an LTN introduced in one area having a knock-on effect in the other.

Comments on Complementary Measures in East Greenwich/Westcombe Park

Although improvements to green space and road crossings are welcome in principle, only a map is provided without sufficient detail to properly assess the proposals. For example, what sort of crossings are envisaged and what sort of greening is proposed? Mid-road 'refuges' already exist at many of the points marked on the map, and it is unclear what is proposed in their place.

There seem to be too few electric charging points envisaged, considering the expected switch to EV.

We hope that these proposals can be discussed in more detail and implemented whether or not the LTN proposals go ahead.

Comments on the consultation

We would like to draw attention to the comments we made about the timing and design of the consultation in our emails dated 4 and 12 September.

The Westcombe Society