



## Mayor and Cabinet

### **Lewisham and Lee Green Low Traffic Neighbourhood: Consultation report and next steps**

**Date:** 12 January 2021

**Key decision:** Yes

**Class:** Part 1

**Ward(s) affected:** Lee Green, Lewisham Central

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## Outline and recommendations

This report outlines to Mayor and Cabinet the outcome of the review of the Lewisham and Lee Green Low Traffic Neighbourhood (LTN), including data monitoring and feedback from the public consultation. This has been used to form the recommendations regarding the future of the Lewisham and Lee Green LTN.

For the reasons outlined in the report it is recommended that Mayor and Cabinet:

- Note the findings of the review of the LTN, including the data monitoring and feedback from the public consultation;
- Consider the Equalities Impact Assessment (EqIA) and specific equalities considerations summarised in section 8 of the report and the full EqIA detailed in Appendix J.
- Agree that proposals for a permanent traffic order retaining the revised Lewisham and Lee Green LTN be published, and that the statutory processes be conducted
- Agree that the physical modal filters within the Lewisham and Lee Green LTN are converted to automatic number plate recognition (ANPR) camera enforcement and that Lewisham blue badge holders and emergency services are exempt
- Agree that officers work with schools in the LTN area to implement traditional school streets, where schools are supportive
- Agree additional complementary measures are implemented within the LTN and surrounding areas, subject to statutory processes and detailed design, including:
  - planters/trees and green spaces
  - additional electric vehicle charging points
  - additional bike hangars and cycle stands
  - additional and/or improved pedestrian crossing points
  - new seating
- Agree to continue to monitor the area using a range of indicators, including, but not limited to, traffic counts, speed surveys, air quality and bus journey times.
- Agree to officers using their existing delegated powers to implement the above recommendations and deliver the package of complementary measures.

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## Timeline of engagement and decision-making

27 May 2020 – Delegated decision – Implementation of temporary measures to support safer walking and cycling in response to the Covid-19 pandemic

July 2020 – Lewisham and Lee Green LTN implemented

November 2020 – Lewisham and Lee Green LTN revised

March 2021 – Lewisham and Lee Green LTN public consultation on measures on proposals aimed at making journeys to and from school safer and healthier

28 June – 8 August 2021 – Lewisham and Lee Green LTN public consultation

### 1. Summary

- 1.1. The Lewisham and Lee Green Low Traffic Neighbourhood (LTN) was first introduced in July 2020. At the time, in response to the pandemic, the Government was encouraging councils to make significant changes to their road layouts to give more space to cyclists and pedestrians and urgently put measures like LTNs in place.
- 1.2. The primary aim was to encourage people to walk and cycle more, and to do so safely whilst maintaining social distancing, as more of us were working from home and exercising and shopping in our local area.
- 1.3. LTNs also aim to improve air quality and public health, reduce noise pollution, and make roads safer, which are all in line with the Council's longer term aims for the whole borough. LTNs achieve this by restricting motor vehicle through traffic within a residential area while keeping through movement for pedestrians and cyclists.
- 1.4. Due to the timescales and expectations set by central government, councils did not have time to consult on these changes and were expected to rapidly introduce measures that would achieve the aims set out in paragraph 1.2, without the full range of traffic studies and preparatory work that would normally be done for such proposals.
- 1.5. The Lewisham and Lee Green area was selected as a location for an LTN in part due to ongoing and consistent concerns raised with the Council by residents over a number of years about traffic congestion and speeds, as well as walking and cycling improvements. Within the Lewisham Transport Strategy and Local Implementation Plan (2019 – 2041) the area had been identified as a priority area for a Healthy Neighbourhood.
- 1.6. The original scheme was implemented in July 2020 using a Temporary Traffic Order (TTO), which allowed the scheme to be implemented quickly. The Council listened to concerns raised by residents and responded to perceived increases in traffic levels and increased bus journey times and made changes to the LTN in November 2020, which re-opened some of the restrictions to traffic, and is known as the revised scheme.
- 1.7. As a result of the changes, the level of concerns raised by residents and those who travelled through the revised LTN significantly reduced.
- 1.8. During the summer of 2021, the Council carried out a public consultation to understand people's views and experiences of the LTN. The feedback from the consultation has formed part of a review of the LTN alongside data collected as part of the monitoring of the scheme, including air quality, traffic counts, traffic speed data, bus journey times and the impact on emergency services. This information has been considered in the context of the Council's longer term ambitions to inform the recommendations about the future of the LTN.

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- 1.9. The review has indicated that the existing, revised Lewisham and Lee Green LTN has met its primary aims, is in line with the Council's corporate objectives and policies and wider London policies, and has started to positively influence behaviour and encourage people to travel more sustainably.
- 1.10. This report set out the results of the monitoring surveys and public consultation, outlines the impact against the aims of the project, outlines improvements to be made and seeks approval for the recommendations and outlines the next steps.

## 2. Recommendations

- 2.1. For the reasons set out in this report it is recommended that Mayor and Cabinet:
  - Note the findings of the review of the LTN, including the data monitoring and feedback from the public consultation;
  - Consider the Equalities Impact Assessment (EqIA) and specific equalities considerations summarised in section 8 of the report and the full EqIA detailed in Appendix J.
  - Agree that proposals for a permanent traffic order retaining the revised Lewisham and Lee Green LTN be published, and that the statutory processes be conducted
  - Agree that the physical modal filters within the Lewisham and Lee Green Low Traffic Neighbourhood are converted to automatic number plate recognition (ANPR) camera enforcement and that Lewisham blue badge holders and emergency services are exempt
  - Agree that officers work with schools in the LTN area to implement traditional school streets, where schools are supportive.
  - Agree additional complementary measures are implemented within the LTN and surrounding areas, subject to statutory processes and detailed design, including:
    - planters/trees and green spaces
    - additional electric vehicle charging points
    - additional bike hangars and cycle stands
    - additional and/or improved pedestrian crossing points
    - new seating
  - Agree to continue to monitor the area using a range of indicators, including, but not limited to, traffic counts, speed surveys, air quality and bus journey times.
  - Agree to officers using their existing delegated powers to implement the above recommendations and deliver the package of complementary measures.

## 3. Policy Context

- 3.1. The contents and recommendations of this report are consistent with the Council's policy framework, as well as wider regional and national policies and priorities, as outlined below.

Lewisham policies
- 3.2. Corporate Strategy 2018-2022 – This sets out what the Council plans to deliver for residents between 2018-2022. The recommendations of this report will help to support the implementation of the Corporate Strategy, namely making Lewisham greener.

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- 3.3. Future Lewisham (2021) – This outlines the Council’s ambitions for the future and priorities as the borough recovers from the impact of the Covid pandemic. One of the core themes of the plan is to create is ‘a greener future’, building on the observed increase in walking and cycling locally, and all the other ways our environment benefitted from behaviour changes over the last year. The other core theme is ‘a healthy and well future’ and recognises that good health and wellbeing is dependent on many determinants including air quality.
- 3.4. Climate Emergency Action Plan (2020) – This sets out the Council’s ambition for Lewisham to be a carbon neutral borough by 2030. More than 25% of the borough’s carbon emissions come from transport, including vehicles travelling in or through the borough. Within the action plan, one of the key policies to move to a decarbonised transport network is to implement a Healthy Neighbourhoods programme to reduce traffic congestion, improve air quality and encourage sustainable modes of travel. The intention is to implement a rolling programme across every area of the borough by 2030.
- 3.5. Air Quality Action Plan 2016-2021 – This outlines the Council’s five-year strategy, from 2016-2021, to improve air quality in the borough. One of the main priorities of the action plan is to expand the sustainable transport infrastructure within Lewisham.
- 3.6. Draft Air Quality Action Plan 2022-2027 – This outlines the Council’s draft five-year strategy, from 2022-2027, to improve air quality in the borough and across London. This includes objectives for cleaner air around schools and for cleaner transport policies, such as encouraging more trips to be made by walking, cycling or public transport to reduce car use; introducing more School Streets, temporary road closures and restrictions for parking; improved provision of infrastructure to support walking and cycling; installation of Ultra-Low Emission Vehicle (ULEV) infrastructure and promote the update of electric vehicles.
- 3.7. Transport Strategy and Local Implementation Plan 2019-2041 – The objectives of the Council’s transport strategy is for travel by sustainable modes to be the most pleasant, reliable and attractive option for those travelling to, from and within Lewisham; Lewisham’s streets to be safe, secure and accessible to all; Lewisham’s streets to be healthy, clean and green with less motor traffic; and Lewisham transport network to support new development whilst providing for existing demand.
- 3.8. Cycling Strategy (2017) – This sets out the Council’s vision for cycling to be a safer and more attractive option for travel. This includes via schemes such as Liveable Neighbourhoods where space is made available for people to enjoy streets without motor vehicles, particularly near schools, to help those walking and cycling.
- 3.9. Draft Health and Wellbeing Strategy 2021-2026 – The Council is planning a refresh of it’s Health and Wellbeing Strategy which will be finalised in 2022. This will build on the Health and Wellbeing Strategy for 2015-2018 which seeks to improve health outcomes for residents, and outlines the need to create physical and social environments that encourage healthy habits, choices and actions.
- 3.10. In addition, the Council is in the process of developing a 10-year Physical Activity Strategy that will develop a clear approach (determined by local priorities and outcomes) to providing effective and sustainable physical activity (including sport) and wider healthy lifestyle opportunities for local communities for the next 10 years. The Strategy will build on the Lewisham Whole Systems Obesity Action Plan 2019-2021.  
London-wide policies
- 3.11. Mayor of London’s Transport Strategy (2018) – This has an overarching aim of reducing dependency on cars and sets strategic targets for 80% of journeys in London to be made by walking, cycling and public transport by 2041 and for all Londoners to do at least 20 minutes of active travel each day by 2041.

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- 3.12. Healthy Streets for London (2017) – The Mayor of London and TfL are taking the Healthy Streets Approach to encourage more Londoners to walk, cycle and use public transport. This approach aims to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business. It outlines some practical steps to help Londoners use their cars less and walk, cycle and use public transport more, including:
- Improving local environments by providing more space for walking and cycling, and better public spaces where people can interact;
  - Prioritising better and more affordable public transport and safer and more appealing routes for walking and cycling;
  - Planning new developments so people can walk or cycle to local shops, schools and workplaces, and have good public transport links for longer journeys.
- 3.13. London Environment Strategy (2018) – This strategy brings together approaches to every aspect of London's environment, integrating air quality, green infrastructure, climate change mitigation and energy, waste, adapting to climate change, ambient noise, and the low carbon circular economy. It recognises that poor air quality is the "most pressing environmental threat to the future health of London" and sets out a roadmap to zero emission road transport which includes reducing car use.

#### National policies

- 3.14. Gear Change (2020) – This strategy sets out the actions required at all levels of government to increase walking and cycling in England, in order to improve air quality, combat climate change, improve health and wellbeing, address inequalities and tackle congestion on our roads.

## 4. Background

- 4.1. Prior to the pandemic, there was a widely recognised need to reduce car dependency in London to improve air quality, reduce congestion, improve road safety and improve public health, as reflected in the Council's Transport Strategy (2019), the Mayor of London's Transport Strategy (2018) and Government policy.
- 4.2. Improving air quality is integral to the Council's target of becoming a carbon neutral borough by 2030. To achieve this target will require a range of radical actions across the Council's corporate estate, transport, housing and green spaces.
- 4.3. Air quality has a distinct impact on life expectancy. Breathing in polluted air is linked to respiratory illnesses, including Chronic Obstructive Pulmonary Disease (COPD), asthma, cardiovascular disease and neurological impairments. Nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM) are both major contributors to air pollution and can contribute to serious health problems like heart disease and cancer. In Lewisham, road transport is one of the main sources of both NO<sub>x</sub> and PM, contributing 64% and 55% respectively.
- 4.4. Monitoring of air quality in Lewisham has shown a decreasing trend in the levels of NO<sub>2</sub> and PM in recent years. On average, annual mean NO<sub>2</sub> concentrations at both roadside and urban background monitoring locations have decreased between 2014 and 2020 by an average of 42% and 37% respectively.
- 4.5. Similarly, during the same period, our three PM<sub>10</sub> monitoring stations (at New Cross, Lewisham and Honor Oak Park) showed an overall downward trend with all annual mean PM<sub>10</sub> concentrations and our two automatic monitoring stations for PM<sub>2.5</sub> (at New Cross and Honor Oak Park) have shown no exceedance of PM<sub>2.5</sub> EU legal limits of 40 micrograms per cubic metre of air (µg m<sup>3</sup>) per year.
- 4.6. However, these limits are significantly less stringent than the recommended World

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Health Organisation (WHO) guidelines which, as of 2021, are annual mean concentrations of 5 µg m<sup>3</sup> of PM<sub>2.5</sub> and 15 µg m<sup>3</sup> of PM<sub>10</sub>. The Council has committed to reporting data against this, expanding the number of PM<sub>2.5</sub> monitoring stations from two to three in 2020. In 2020, two monitoring stations recorded annual mean PM<sub>2.5</sub> levels within the limits that were current at the time (10 µg m<sup>3</sup> per year), while one station (LW2 in New Cross) recorded annual mean PM<sub>2.5</sub> of 12.6 µg m<sup>3</sup>.

- 4.7. More needs to be done to reduce exposure to air pollution and meet the WHO guidelines. Despite significant improvements, levels of air pollution in London are still too high for the health of many Londoners and the study found that in 2019 toxic air contributed to the deaths of more than 4,000 Londoners. This shows that there is still vital work to do to improve London's air quality and that reducing emissions from vehicle usage is critical.
- 4.8. The Council's draft Air Quality Action Plan 2022-2027 (as noted in section 3.6) outlines a series of measures and actions that aim to further enact downward trends in the concentration levels of harmful air pollutants. This includes implementing traffic-related schemes such as School Streets, provision of infrastructure to support walking and cycling to encourage active travel, and provision of electric vehicle charging infrastructure to encourage use of cleaner vehicles.
- 4.9. Encouraging sustainable and active travel and reducing car dependency is a key tool to reducing traffic congestion, meaning fewer vehicles are on the road. This in turn is expected to improve the efficiency of public transport and essential vehicle trips as journey times are less affected by congestion resulting from short, unnecessary car journeys.
- 4.10. However, traffic on London's roads has increased in the decade since 2009 by more than 20%, with an additional 3.9 billion miles travelled in the city, bringing the total number of miles travelled by motor vehicles to 22.6 billion in 2019 ([road traffic statistics by DfT, 2020](#)).
- 4.11. In Lewisham, traffic has increased by almost 25% in that same decade, bringing the total number of miles travelled on Lewisham roads by motor vehicles to 613 million in 2019 ([road traffic statistics by DfT, 2020](#)).
- 4.12. In addition, from 2009 to 2019, an increase of almost 60% of traffic has been monitored on local roads in London ([road traffic statistics by DfT, 2020](#)), which are not designed to carry high volumes of traffic or high speeds. These are roads which are classified as 'C roads' or have no classification and are designed to perform local functions, such as for local journeys which could be made by active modes of travel.
- 4.13. GLA data shows that over one third of all car trips made by London residents are for journeys of less than 2km ([Health impacts of cars in London, GLA 2015](#)), contributing to the high levels of vehicular traffic monitored on London roads. A number of these journeys could be made by active travel modes instead, for example 2km can be walked within 25 minutes.
- 4.14. High levels of congestion are linked to increased risk of road danger. Between 2017-2021 there were more than 4,000 casualties as a result of traffic collisions in Lewisham, of which 21 were fatal. High priority interventions suggested to reduce road danger include lowering speeds to 20mph; introducing measures to reduce the dominance of traffic; and designing streets with safety in mind that encourages ways of travel which pose less risk of other people on the roads, e.g. new or upgraded high-quality cycle routes and infrastructure to make walking safer, easier and more accessible for all.
- 4.15. Furthermore, TfL data found that one quarter of traffic on weekday mornings was contributed by the 'school run', of which the average journey was less than 1km (about a 10 minute walk (TfL, 2018)). School streets, a scheme where motor vehicle access is

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restricted outside a school during drop off and pick up times, have been widely introduced across London to reduce this congestion as well as to improve road safety surrounding schools, encourage children to walk and cycle, and improve air quality. A survey by TfL suggested that school streets had helped to increase the trend towards walking instead of driving to school, while a GLA study showed that pollution sensors in primary schools monitored reduced NO<sub>2</sub> levels by up to 23% at schools that had a school street.

- 4.16. Air pollution and physical inactivity contribute significantly to ill health in Lewisham. In 2018/19, 5.3% of people living in Lewisham had asthma, which is above the London average. In addition, of children aged 10-11 years in the borough, almost 25% are identified as obese and over 37% live with excess weight, higher than the average figures in England.
- 4.17. In addition, more than 25% of adults in Lewisham and 50% of children in London fail to meet the recommended daily levels of exercise.
- 4.18. The development of Healthy Neighbourhoods, and delivery of measures to encourage greater levels of sustainable and active modes of travel are part of the Council's long-term strategies to reduce car dependency and road danger, and improve air quality. These policies can also help to tackle other public health issues in the borough, such as high levels of childhood and adult obesity and physical inactivity.
- 4.19. The Council was already working on a Healthy Neighbourhood programme which would deliver traffic management measures and School Streets alongside complementary measures such as contra-flow cycling, improved pedestrian crossing points, secure cycle parking, street trees, benches and electric vehicle charging points to areas across the borough. The Healthy Neighbourhood programme was in line with the Mayor of London's Healthy Streets Approach and would aim to reduce car dependency, improve air quality, reduce congestion, improve road safety and improve public health.
- 4.20. As set out in the Transport Strategy, the borough was split into 18 areas with boundaries based on key transport corridors such as main roads and railway lines. These 18 areas were ranked for intervention need based on a number of factors, including personal injury collisions, air quality, levels of obesity and deprivation, and resident feedback . Based on the above, the Lewisham and Lee Green area was identified as one of four areas prioritised for initial intervention.
- 4.21. On 9 May 2020, soon after the country went into a national lockdown as a result of the COVID-19 pandemic, the Secretary of State for Transport issued additional statutory guidance under Section 18 of the Traffic Management Act 2004, providing advice on techniques for managing roads to respond to a range of pertinent issues, summarised below:
  - the government indicating a likely need to retain social distancing guidelines for some time;
  - an observed increase in speeding/dangerous driving on the road network;
  - limitations on public transport capacity while social distancing is required;
  - potential public concern over the use of public transport;
  - a likelihood of increased car trips as restrictions are lifted;
  - an encouragement from central and local government that journeys are kept local, and that these are made on foot or by bicycle where possible;
  - a high proportion of footways that are not wide enough to safely accommodate social distancing practices;

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- the potential to combine trip purposes where possible to minimise exposures (e.g. physical exercise such as walking/cycling with a trip to the shops);
  - a need for people to maintain good physical and mental health, increasing resilience against COVID-19 symptoms; and
  - a need for residents who may have been impacted financially to feel that they have viable low cost transport options available to them.
- 4.22. The document set out high-level principles to help local authorities to manage their roads and the appropriate actions they should take. The guidance also specified that Authorities should monitor and evaluate any temporary measures that are installed, with a view to making them permanent, and embedding a long-term shift to active travel as the country moves through the recovery phase and into a newly shaped 'business as usual'. Following the publication of this guidance, the Department for Transport (DfT) agreed a financial settlement with TfL that allowed it to work with London Boroughs to roll out measures contained within this guidance.
- 4.23. As a result and in response to the COVID-19 pandemic, a number of local authorities across the UK and beyond implemented measures to help people safely make the essential trips they need to on foot or by bicycle.
- 4.24. Concurrently, TfL withdrew the majority of transport funding previously allocated to boroughs, with the exception of any 'sunk' costs already incurred. All remaining funding was reallocated to boroughs who were in a position to rapidly implement temporary transport interventions in response to the issues outlined above. The DfT also allocated some funding directly to boroughs for this purpose.
- 4.25. In London TfL published guidance on 15 May 2020 setting out its expectations of boroughs to manage roads to respond to the issues outlined in section 4.21. This took into account the London context and unique pressures and issues that were being experienced. The guidance set out the pressing need to safely accommodate more walking and cycling trips as travel restrictions are relaxed, but whilst social distancing guidance remains. It explained the types of measures that will help to achieve this, which was broadly consistent with the DfT guidance. It sought to transform London's streets by:
- Providing temporary cycle routes to extend the strategic cycle network, with London's main roads repurposed for temporary cycle lanes and wider footways so that people can safely socially distance.
  - Providing additional space for people walking and cycling in town centres and at transport hubs, including widening of footways on local high streets to enable people to queue safely for shops which will help facilitate local economic recovery
  - Accelerating delivery of low traffic neighbourhoods and school streets by working with boroughs to reduce through traffic on residential streets, to further enable more people to walk and cycle safely as part of their daily routine
- 4.26. The primary objective of these measures was to protect public health and safety during the COVID-19 pandemic, as people started to undertake more trips, which made these measures increasingly urgent. They helped to support the recovery from the crisis whilst also being in alignment with a wider range of existing policy objectives, as outlined in section 3 of this report.
- 4.27. As a result of the COVID-19 emergency, the resulting lockdown and social distancing requirements, trip patterns changed substantially. Crucially, whilst the need for social distancing remained, any external factors that resulted in an increase in walking and cycling trips (which is something to be encouraged), at the same time as there being an increase in vehicular traffic or speeding (which is undesirable), was a cause for

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concern on safety grounds.

- 4.28. This is because people needed more space than usual in order to maintain social distancing whilst walking/cycling. This was more difficult to achieve when available space was constrained by a combination of narrow footways, shop queueing systems, parking, and high traffic volumes and/or speeds on the carriageway. Put simply, if people needed to frequently step into the carriageway to maintain a 2m clearance when passing others, this put them at increased risk without mitigation measures in place, particularly in the locations with the highest footfalls and traffic volumes/speeds.
- 4.29. Cyclists were also vulnerable, again, particularly where traffic volumes or speeds were high. This was especially relevant for newer cyclists who may not have received any formal cycle training, to give them confidence riding in busy traffic, due to the restrictions currently in place. Cyclists were also likely to need to negotiate pedestrians stepping into the carriageway, and lower traffic volumes would give them greater flexibility to react quickly in this respect, without putting themselves in danger.
- 4.30. Responding to the guidance, a range of interventions were proposed that sought to either create more protected space for pedestrian and / or cyclists, or that aimed to lower traffic volumes and speeds so there was greater scope for road users to safely share spaces.
- 4.31. One of those interventions was the implementation of a LTN for the Lewisham and Lee Green area, which is outlined in section 5 of this report.

## **5. Implementation of Lewisham and Lee Green LTN**

- 5.1. The Lewisham and Lee Green LTN was first introduced in July 2020. At the time, in response to the pandemic, the Government was encouraging councils to urgently put measures like LTNs in place.
- 5.2. The primary aim was to encourage people to walk and cycle more, and to do so safely whilst maintaining social distancing, as more of us were working from home and exercising and shopping in our local area. Within the LTN area there are eight schools, both primary and secondary, two railway stations, parks and sports facilities and local shopping areas, which are destinations within the area for local trips. In addition the Lewisham to Lee cycleway is in the area.
- 5.3. LTNs also aim to improve air quality and public health, reduce noise pollution and make roads safer, which are all in line with the Council's longer term aims for the whole borough. LTNs achieve this by restricting motor vehicle through traffic within a residential area while keeping through movement for pedestrians and cyclists.
- 5.4. Due to the timescales and expectations set by central government, councils did not have time to consult on these changes and were expected to rapidly introduce measures that would achieve these results, without the full range of traffic studies and preparatory work that would normally be done for such proposals.
- 5.5. The Lewisham and Lee Green area was selected as a location for an LTN in part due to ongoing and consistent concerns raised with the Council by residents over a number of years about traffic congestion and speeds, as well as walking and cycling improvements.
- 5.6. The scheme was implemented using a Temporary Traffic Order (TTO), which allowed the scheme to be implemented quickly. A combination of camera-enforced and physical modal filters were installed in locations across the Lewisham and Lee Green area to complement the existing filters in the area (see Appendix B). Emergency services were permitted to travel through camera-enforced restrictions.
- 5.7. In the decision report dated 27 May 2020, it was noted that the measures would be kept under review and would be lifted or amended if they were not considered to be

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contributing at all to the policy objectives set out.

- 5.8. The Commonplace platform was used to publish information related to the implementation of the LTN and for residents to provide feedback on the scheme.
- 5.9. The Council listened to concerns raised by residents and responded to perceived increases in traffic levels and increased bus journey times and made changes to the LTN in November 2020, which opened some of the restrictions to traffic (see [Appendix C](#)).
- 5.10. These changes were made in anticipation that they would ease traffic congestion on Hither Green Lane and at key junctions with the South Circular. The changes were:
  - On Manor Lane the existing camera was adjusted to allow vehicles to pass through in both directions, except heavy goods vehicles (HGVs);
  - On Manor Park the existing camera was adjusted to allow vehicles to travel northbound (towards Lee High Road). The camera continues to enforce vehicles who try to travel southbound;
  - The existing cameras on Ennersdale Road and Dermody Road were adjusted to allow vehicles to travel one-way west to east (from Hither Green towards Lee Green). The camera continues to enforce vehicles who try to travel east to west (from Lee Green towards Hither Green);
  - On Leahurst Road the fire gate was removed to allow vehicles to travel west to east (from Hither Green towards Lee Green). A new camera enforces this restriction. The width restriction was replaced by a 7.5 tonne weight restriction which is also enforced by camera.
- 5.11. Other changes have been made in response to feedback from residents, including enabling residents who are Blue Badge holders to apply for a vehicle exemption to drive through all modal filters and making the signs for the Dermody Road modal filter more prominent to encourage greater levels of compliance.
- 5.12. Typically, with these types of schemes, complementary measures such as cycle lanes, bike hangars and EV charging points would be implemented to encourage behaviour change for a modal shift for travel. However the conditions for funding by TfL at the time was that only restrictions would be funded.

## 6. Data monitoring

- 6.1. Since the LTN was launched, the Council has been undertaking monitoring to understand how the LTN is operating, its impact and whether it is achieving its aims as set out in section 1.2 and 5.2 of this report.
- 6.2. The key elements being monitored are:
  - Traffic levels on local roads
  - Traffic speed across local roads
  - Air quality
  - Bus journey times
  - Impact on emergency services
- 6.3. Due to the timescales and expectations set by central government, councils did not have time to undertake the full range of traffic studies and preparatory work that would normally be done in advance for such proposals.
- 6.4. The Council does not have all the baseline air quality data that it would do in normal

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circumstances. This is because at least three months' continuous data is preferable to understand any regular fluctuations that occur under normal circumstances. However, the Council already has a range of locations where air quality is monitored. These include five continuous air quality monitoring sites in Lewisham, Catford, Deptford, New Cross and Honor Oak Park, that provide historic and predicted air pollution levels to the London Air Quality Network website. There are also 50 nitrogen dioxide diffusion tubes at locations around the borough, and in September 2020 a further 51 temporary monitoring sites were added to capture data for the LTN.

- 6.5. The Council does hold some baseline data for traffic counts and speeds. Traffic counts and speed surveys were commissioned in March 2019 and further counts in June/July 2020. These counts were taken at a number of locations across the LTN and surrounding area over a 7-day period and were recorded outside of school holiday time periods. Although both these data sets are baseline measures, the effects of Covid-19 on travel behaviour for these two time periods need to be factored into the consideration of the data analysis.
- 6.6. The Council has also collected 'after' monitoring data to give a comprehensive picture of the impact of the LTN. Traffic counts and speed surveys were commissioned in September / October 2020 to assess the impact of the original scheme and February 2021 for the revised scheme. During this time air quality continued to be monitored and officers worked with TfL to understand the impact on bus journey times.
- 6.7. A comparison of the baseline data and after monitoring can be found below.  
Air quality data
- 6.8. The Council maintains a network of Nitrogen Dioxide (NO<sub>2</sub>) diffusion tubes to assess pollution levels. NO<sub>2</sub> is a pollutant that is harmful to health and is related to the use of petrol and diesel engines. Further information on air quality and live readings can be found on the Council's website: [www.lewisham.gov.uk/airquality](http://www.lewisham.gov.uk/airquality)
- 6.9. There are variables that will influence overall air quality in an area, such as weather conditions that may disperse air pollution from one area to another, and changes in lockdown restrictions, which will influence people's travel patterns. Please note that some of the longer roads were subject to more than one survey location.
- 6.10. The LTN is aimed at encouraging long term behaviour change and it was not anticipated that there would be a significant, immediate change in air quality.
- 6.11. The data presented in Graph 1 on page 11 of the consultation leaflet (see Appendix D) shows the average NO<sub>2</sub> recorded (June – October 2020 for the original scheme and November 2020 to March 2021 for the revised scheme) over the course of the two variations of the scheme which shows the schemes have had little to no impact on air quality in and around the area. However, monitoring found that the overall mean NO<sub>2</sub> concentration for the LTN monitoring network was 29.0 ug/m<sup>3</sup> for the original scheme and 31.4 ug/m<sup>3</sup> for the revised scheme.
- 6.12. Looking at the average NO<sub>2</sub> readings in Graph 1, it can be seen that there are no locations where NO<sub>2</sub> exceeded the EU Legal limit of 40 micrograms per cubic metre of air (40 µg/m<sup>3</sup>).
- 6.13. Air quality monitoring on the A205 South Circular indicates that air quality improved during the first of the lockdown when people's travel was restricted. The air quality is now comparable to pre-pandemic levels as restrictions have eased. The Council continues to monitor air quality across the borough.
- 6.14. Air quality has continued to be monitored and provisional data available for the automatic air quality monitoring stations for 2021 indicate no exceedances of the objectives for NO<sub>2</sub>, PM<sub>10</sub> or PM<sub>2.5</sub>. It is vital to note that the data referred below is currently provisional and still needs to be ratified and may be subject to change.

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Therefore this data is not definitive and will be given careful consideration in the future monitoring of the scheme when all required processes have been completed.

- 6.15. Provisional concentrations of NO<sub>2</sub> reported in 2021 at the automatic monitoring stations were broadly similar to those reported in 2020, with provisional concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> slightly higher.
- 6.16. Provisional data for the NO<sub>2</sub> diffusion tube network for 2021 indicates that generally higher concentrations of NO<sub>2</sub> were recorded than those observed in 2020, with some tubes reporting concentrations similar those observed in 2019. From the provisional data available for 2021, potential exceedances are indicated only at two of the 101 monitoring locations, the South Circular and New Cross monitoring stations, where means of 41.6 µg m<sup>-3</sup> and 44.4 µg m<sup>-3</sup> are currently reported. It should be noted that the South Circular data was also shown to be in exceedance of the annual mean objective in 2018 and 2019.

#### Traffic level monitoring

- 6.17. It is important to note that any transport-related data capture has limitations and does not consider external factors on the network such as road works, collisions, broken down vehicles etc. A range of variables will also need to be considered such as seasonality, as different modes of transport and the associated flows may differ between times of year.
- 6.18. In addition, data capture during a pandemic is not representative of normal conditions, and traffic flow was affected by the tightening and easing of lockdown measures by the government which have severely influenced the frequency, method and usage of travel methods, resulting in at times volatile results. The monitoring data has been undertaken over a period that is not under 'normal' conditions and we are still unclear when or if 'normal' conditions will return. Therefore the data produced and analysed to aid monitoring and evaluation of the scheme is used with the knowledge that it holds some limitations.
- 6.19. Initial traffic count data was collected in March 2019 as part of the preparatory work for the Lewisham and Lee Green Healthy Neighbourhood. When the LTN was introduced it was understood that the 2019 traffic counts did not cover the entire area so additional data was collected in June 2020 to provide indicative information based on similar streets. Both the March 2019 and June 2020 traffic counts form the Council's pre-scheme data. As part of the monitoring of the original scheme, additional data capture was undertaken in October 2020 to cover the 'original LTN', and then a final survey was undertaken in February 2021 to provide an insight into the operation of the 'revised LTN' as introduced in November 2020.
- 6.20. During this time, there have been several notable changes such as the opening and closing of schools, restrictions on public transport patronage numbers and encouragement where possible to work from home. This resulted in unpredictable travel patterns, with many people choosing to walk and cycle over public safety concerns when needing to travel. This fear also resulted in people opting to drive as an alternate to the reduced capacity levels on public transport, resulting in an increase in vehicle movements at times. Traffic has been monitored across 55 locations within and outside of the LTN at different periods of time to understand the effects of the scheme.
- 6.21. Due to the speed at which LTNs were required to be installed, we don't have a perfect set of monitoring data. For some of the roads, pre-scheme surveys were conducted in March 2019, in response to residents' concerns about traffic, walking and cycling, and others in June 2020, when COVID-19 restrictions were in place. These counts provide a snapshot in time. We have provided the comparable data that is available and this is presented in the consultation paper. Additional monitoring has taken place on other roads, including boundary roads, but where there is no comparable data available this

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has not been included in the tables. However, this information is available in the monitoring report.

- 6.22. The results are shown in two tables on pages 7 and 8 of the consultation leaflet, see appendix D . The tables show the original pre-scheme traffic monitoring available for that road, alongside data from October 2020 (original scheme) and February 2021 (revised scheme). The information is presented for locations within the LTN and for outside the LTN, which are in neighbouring areas. Please note that some of the longer roads were subject to more than one survey location and these are made clear in the tables. The tables in the consultation paper outline the average number of vehicles per road per day.
- 6.23. In summary traffic levels reduced by 69% between March 2019 and February 2021 and by 20% between June 2020 and February 2021 on the roads surveyed. As noted in the consultation leaflet there were four locations where there was an average increase in traffic, namely Courthill Road, Benin Street, Manor Lane Terrace and Harvard Road.

#### Traffic speed monitoring

- 6.24. Local authorities, such as Lewisham Council, may influence the speed of vehicles through the use of traffic calming measures, such as speed humps. However, the Council cannot install speed cameras or issue fines for speeding, as under current legislation enforcement of speed limits is the responsibility of the Police.
- 6.25. The tables on pages 9 and 10 of the consultation leaflet outlined the average speed (mph) data by location from March 2019 and June 2020.
- 6.26. Average vehicle speeds have reduced by 2mph between March 2019 and February 2021 on roads both inside and outside the LTN. Four locations, namely Eastdown Park, one location on Leahurst Rd, Gilmore Road and Morley Road, did record a small increase in average speed of approximately 1.5mph, however the speeds were not in excess of 20mph.
- 6.27. Average vehicle speeds have reduced by 1.2mph between June 2020 and February 2021 on roads both inside and outside the LTN. Seven locations did record a small increase in average speeds of approximately 1.4mph, and three locations recorded average speeds of 21mph.

#### Bus journey times

- 6.28. The Council has worked with Transport for London (TfL) who have monitored bus journey times. The monitoring area covers journey times for three key corridors; Brownhill Road, Burnt Ash Hill / Burnt Ash Road and Lee High Road / Eltham Road, for the period between January and December 2020.
- 6.29. TfL data shows bus journey times on these corridors have fluctuated over the course of 2020, coinciding with the introduction and easing of COVID restrictions. This includes an increase when the original scheme was introduced in July 2020 and when schools returned in September 2020. The data indicates that the fluctuations have settled since the scheme was revised in November 2020.
- 6.30. TfL data for Brownhill Road shows an average increase of nearly two minutes for eastbound bus journey times between January and December 2020. The westbound average bus journey times however reduced by three minutes over the same period. For the Burnt Ash Hill / Burnt Ash Road corridor data indicated an average increase in northbound bus journey times by just over one minute, with no change in the southbound times.
- 6.31. For the Lee High Road / Eltham Road corridor there was no material change in

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average bus journey times eastbound and a slight increase in average journey times westbound of one minute, when comparing the average bus journey times of January 2020 to December 2020.

6.32. More recently, TfL has provided data which compares bus journey times from the week commencing 20 September 2021 with a baseline average journey time for March 2019-March 2020. This shows:

- An increase of 0.4 minutes (24 seconds) per km for buses travelling eastbound on Brownhill Road
- A decrease of 0.1 minutes (six seconds) per km for buses travelling westbound on Brownhill Road
- An increase of 0.5 minutes (30 seconds) per km for buses travelling northbound on Burnt Ash Hill
- An increase of 0.1 minutes (six seconds) per km for buses travelling southbound on Burnt Ash Hill

6.33. This recent data suggests that bus journey times along Brownhill Road and Burnt Ash Hill is similar to that of pre-pandemic bus journey times which would not cause concern for TfL's bus network.

Emergency services response times

6.34. Prior to the launch and during the Lewisham and Lee Green LTN, the Council held regular meetings with the emergency services to discuss any emerging operational issues coming from the Police, Fire and Ambulance service representatives. Discussions at these meetings also covered impacts of the LTN on emergency services.

6.35. At no point have the emergency services requested specific changes to be made to the LTN. The London Ambulance Service (LAS) had reported a small number of incidents that led to delays within the original LTN scheme, but this has since been revised. In addition the LAS have throughout expressed a preference for camera enforced restrictions rather than physical road closures.

6.36. However, it should be noted that similar to monitoring traffic data within a pandemic, the emergency services have been operating under different circumstances to 'normal'. The Council therefore continues to liaise with emergency services.

## 7. Consultation

7.1. Due to the timescales and expectations set by central government, councils did not have time to consult on the proposals for the LTN and were expected to rapidly introduce measures that would encourage people to walk and cycle more, and to do so safely whilst maintaining social distancing, without the full range of preparatory work that would normally be done for such proposals, including resident and stakeholder engagement.

7.2. However, the Council committed to reviewing the LTN and, as part of this, undertaking a public consultation to enable residents from inside and outside of the LTN and other interested stakeholders to express their views on the scheme. It has been stated that the feedback from this consultation would be used alongside data collected as part of the monitoring of the scheme, and considered in the context of wider policies, to inform a decision on the future of the scheme.

7.3. A public consultation was open for six weeks, between 28 June until 8 August 2021. The consultation was open to everyone to understand people's experiences of the LTN.

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- 7.4. A total of 35,980 paper copies of the consultation with pre-paid envelopes were delivered to addresses in and around the LTN (Appendix D) and the online survey was open to everyone.
- 7.5. The consultation campaign was supported by:
- Posters on lampposts, particularly around the boundaries of the LTN;
  - Media relations work resulting in local press articles;
  - Repeated mentions in the Council's weekly resident e-newsletter;
  - A social media campaign, including geographically-targeted adverts;
  - Mentions in the Council's weekly staff e-newsletter;
  - Reminder postcards delivered to every home in the distribution area, two weeks before the consultation closed;
  - Door knocking in areas/roads with lower response rates;
  - A dedicated phone line and email address for people to get in touch throughout the consultation;
  - A consultation leaflet, monitoring strategy and FAQ document (see Appendices D, E and F) to inform respondents.
- 7.6. The consultation asked questions relating to the original configuration of the LTN, as well as the revised scheme and sought to understand the views of residents.
- 7.7. The specific aims of the consultation were to find out:
- How people feel about the original and revised LTN;
  - The perceived impact of the original and revised LTN;
  - The impact on how people travel as a result of the original and revised LTN;
  - How people living in different areas feel about the original and revised LTN;
  - Whether people have any suggested changes to the original and/or revised LTN going forward.
- 7.8. The consultation included a wide range of groups, such as local representative groups, disability groups, public transport operators, schools, places of worship and health providers to get a wider pool of respondents.

#### Consultation responses

- 7.9. A total of 7,065 responses to the consultation were received. The majority of these responses originated from households within the consultation area (including the LTN), totalling 5,059.
- 7.10. A detailed report of the consultation responses can be found in Appendix G. The key findings of the consultation responses are detailed below.
- 21% (1,483) of all respondents said that the revised LTN had encouraged them to walk or cycle.
  - 14% (751) of car drivers said that the LTN had encouraged them to walk or cycle more.
  - There was strong support given to more trees, bike hangars, traditional school streets, and electric vehicle charging points.
  - 60% of respondents said that they felt negatively about the original LTN, as opposed to 40% of respondents who felt positively or neutral.

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- 56% of respondents felt negatively about the revised LTN, as opposed to 44% who felt positively or neutral.
- 71% of respondents who identified themselves as drivers felt negatively about the original LTN whilst 64% felt negatively about the revised scheme.
- Respondents who identified as non-drivers felt positive about both variants of the LTN. 46% felt positive about the original LTN compared to 35% for the revised LTN.

## 8. Review

8.1. A wide range of evidence has been used for the review to inform the recommendations, and includes:

- An analysis of the data collected, including air quality data, traffic counts, traffic speed, bus journey times and impact on emergency services;
- An analysis of the responses given to the public consultation;
- Consideration of the LTN's role in meeting Council, regional and national policies and priorities.

8.2. The objectives of the scheme have been developed in response to the pandemic, however, they also align to the Council, and London's, wider and longer term objectives. The evidence shows that LTNs help change travel behaviour which benefits both the user, the local community and surrounding area.

8.3. In Lewisham:

- air pollution and physical inactivity contribute significantly to ill health. In 2018/19, 5.3% of people living in Lewisham had asthma, which is above the London average.
- of children aged 10-11 years, almost 25% are identified as obese and over 37% live with excess weight, higher than the average figures in England.
- 5% of all road traffic collisions involve children and they are a leading cause of child fatalities. In the borough, there are increased numbers of collisions occurring in children aged 10-15 years and 70% of casualties under 18 in Lewisham are pedestrians
- more than 25% of adults in Lewisham and 50% of children in London fail to meet the recommended daily levels of exercise.

8.4. Delivery of the benefits of LTNs are not instant and will develop over time as they are seeking to change behaviour and habits. The review has looked to understand how the scheme has impacted so far and how it can be developed going forward to ensure that those wider objectives are met. It has also considered whether or not there are any short-term negative impacts that require addressing.

8.5. Survey data enables an assessment of the scheme to date, although over the review period these figures will have been impacted by the local and national restrictions put in place to manage the COVID-19 pandemic. Therefore it is not possible to differentiate the impact of the LTN from the wider changes in traffic flow and composition which will have resulted from the restrictions.

8.6. So far, the overall data has shown:

- Traffic levels with a few exceptions have decreased in the area.
- Vehicle speeds have mainly reduced across the area

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- Air quality has improved or remained static in the majority of provisional readings
  - Bus journey times have fluctuated throughout the period with an increase in eastbound journey times on the A205 directly after implementation of the original scheme. However since the scheme was revised bus journey times have been consistent to the expected variations.
  - Vehicle journey times on the main A roads have increased slightly for those traveling eastbound on the A205.
- 8.7. A number of the outcomes that the LTN is seeking to achieve would not be expected to be realised immediately. The data from the monitoring surveys aligns with the expectation of the revised scheme after 12 months.
- 8.8. Key to increasing the number of those walking and cycling is the environment and safety in which the activity is carried out. Reducing vehicle numbers and speed helps to improve safety and crucially the perception of safety.
- 8.9. It is recognised that, in the short term, concerns arising from the restrictions implemented can be the impact outside of the area and on main roads as vehicles seek alternative routes. Information from TfL regarding bus journey times suggests that there has been a minimal impact since the scheme was revised. There are variations week to week, which would be expected as the highway network is dynamic and affected by a range of incidents, such as broken down vehicles, emergency repairs etc. In addition to this the Covid restrictions have added an additional complexity to understand the true LTN impact. It would be expected that the longer the LTN is in place the changes in travel behaviour will continue to reduce any impact.
- 8.10. As vehicle emissions are a main contributor to air pollution the reduction in vehicle numbers would suggest the scheme is not having any negative air quality implications. The changes on the main roads appear to be minimal and therefore again suggest limited negative impacts.
- 8.11. Understanding the impact on individual users is important consideration in determining how the scheme is meeting its aims and objectives. The consultation results suggest that at this time the majority of respondents felt negatively towards the revised scheme at 56%. Breaking this response down showed that:
- The majority of respondents who identified themselves as drivers felt negatively about both variants of the LTN.
  - Of the respondents who identified themselves as non-drivers the greater proportion felt positive about both variants of the LTN.
- 8.12. The measures put in place do mean that those using a motor vehicles will need to use alternative routes that maybe longer and therefore may take additional time. This disadvantage for drivers is recognised and is a consequence of preventing through motor traffic using this area. However, the health and other benefits of improved air quality and residents meeting their recommended level of activity will be recognised over the longer term.
- 8.13. The consultation results have indicated that the scheme has already started to influence travel behaviour:
- 21% (1,483) of all respondents said that the revised LTN had encouraged them to walk or cycle.
  - 14% (751) of car drivers said that the LTN had encouraged them to walk or cycle more
- 8.14. In addition a request was received from the United Cabbies Group for black cabs to have access to the Manor Park bus gate to the same degree as buses. This request

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was given consideration however, it is not considered appropriate as it would compromise the degree to which the benefits of the scheme would be realised. It should be noted that all locations in the LTN are fully accessible by motor vehicles, including black cabs, although it is acknowledged that this may be by a slightly longer route. In addition, we have continued to exempt registered Lewisham Blue Badge holders and registered SEN transport providers to travel through the camera enforced restrictions.

## 9. Conclusion and proposed next steps

- 9.1. The core aims of the LTN were to encourage people to walk and cycle more; improve air quality; improve road safety; reduce traffic; and protect public health during the pandemic.
- 9.2. The Council has carefully considered an extensive range of data and listened to residents' thoughts and experiences since the original LTN was first introduced.
- 9.3. Whilst it is acknowledged that there have been some negative impacts of the LTN, on balance the review indicates that the existing, revised Lewisham and Lee Green LTN is meeting its aims, is in line with the Council's corporate objectives and policies, as well as wider London policies, and has started to positively influence travel behaviour.
- 9.4. Therefore it is recommended that proposals for a permanent order retaining the revised Lewisham and Lee Green LTN be published, and that the statutory processes be conducted. In addition, it is recommended that a new package of complementary environmental measures should be introduced, subject to discussion where appropriate. These additional environmental measures will be delivered across the consultation area to encourage further behaviour change, increase levels of walking and cycling and improve amenity. These measures include traditional school streets, greening, such as new street trees, electric vehicle charging points and cycle parking. It is expected that these will support the continuation of the LTN, subject to statutory processes, and will in any event serve to meet the aims of reducing traffic, boosting air quality, and encouraging walking and cycling.
- 9.5. In response to the clear support for road safety measures for children at school start and end times, both in the feedback to the public consultation for the LTN and the consultation for school measures, it is recommended that traditional school streets should be installed subject to discussions with the primary schools in the area. The schools included in the proposals are:
  - St Winifred's RC School
  - Trinity CofE Primary School
  - Trinity CofE Secondary School
  - Brindishe Lee School
  - Brindishe Manor School
  - St Saviour's RC School
- 9.6. In addition, it is recommended that all remaining physical modal filters be changed to camera enforced variants, to increase access for the emergency services, as well as to reduce vandalism and operational costs. This recommendation will also be carried forward for future schemes of a similar nature, subject to relevant reviews, as well as similar measures outside the LTN across the borough.
- 9.7. In addition to the above, changes will be investigated that respond to views expressed in the consultation response, such as:
  - Improvements to the Lewisham to Lee cycleway;

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- Changes to the layout of the restriction at Leahurst Road
- 9.8. As with all transport schemes it is important to continue to monitor the scheme and respond to any issues identified. Therefore, the Council will continue to monitor air quality and traffic in and around the LTN area. In addition, the impact of the new environmental measures on walking and cycling will be assessed and as part of this some new pedestrian and cyclist counts will be undertaken.

## 10. Financial implications

- 10.1. The recommendations of this report include the delivery of a package of new environmental measures for the consultation area over a two year period.
- 10.2. An application for LIP (Local Implementation Plan) funding has been made to TfL to cover the costs relating to the delivery of these measures in 2022/23 and 2023/24. The service is waiting for the outcome of this application. Whilst awaiting the outcome of this application, the service are working with the Planning Service to ascertain the level of Section 106 and Community Infrastructure Levy (CIL) monies, which could be used to fund this programme of work should the application be unsuccessful.
- 10.3. At this stage, there is no need for a further call on the Council's revenue or capital resources to fund these works, due to the above funding sources.

## 11. Legal implications

- 11.1. The Council has various powers to make alterations and improvements to its highways. In addition Section 39 of the Road Traffic Act 1988 requires the Council to prepare and implement a programme of measures to improve road safety, and includes the power to engineer roads to make them safer
- 11.2. The Road Traffic Regulation Act 1984 (RTRA) sets out the legal framework for traffic management orders. The procedures for making permanent and experimental traffic management orders and the form that they should take are set out within the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and they, prescribe inter alia, specific publication, consultation and notification requirements that must be followed. The results of any traffic order process are to be reported separately through the existing delegated approval process and the Council is legally obliged to take account of any representations made during the statutory consultation period before deciding whether or not to make the TMO
- 11.3. Section 75 of the Highways Act 1980 authorises a highway authority to vary the relative widths of the carriageway and of any footway in a public highway. This includes the power to widen a footway within the existing boundary of the road. No procedure and in particular no consultation is prescribed for the use of section 75. This power will authorise any proposed amendments to footway widths required as part of the project.
- 11.4. Section 122 of the Act imposes a duty on the Council to exercise the functions conferred on them by the RTRA as (so far as practicable having regard to the matters specified in S122 (2)) 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'.
- 11.5. The matters set out in S122(2) are:-
- 11.6. the desirability of securing and maintaining reasonable access to premises;
- 11.7. the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the

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- areas through which the roads run;
- 11.8. the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
  - 11.9. the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
  - 11.10. any other matters appearing to the local authority to be relevant.
  - 11.11. Part 2 of The Traffic Management Act 2004 (TMA) places a network management duty on local traffic authorities in England. It reinforces the legal duty under the RTRA to ensure the expeditious movement of traffic. S18 of the Act enables the Secretary of State to issue guidance to local traffic authorities to which they must have regard when exercising their network management duty under the Act.
  - 11.12. The main principles advocated in the TMA statutory guidance are:
    - managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists), as required under the Traffic Management Act 2004 Network Management Duty
    - improving road safety
    - improving the local environment
    - improving the quality and accessibility of public transport
    - meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car
    - managing and reconciling the competing demands for kerb space.
  - 11.13. On the 30 July 2021, the Secretary of State for Transport issued additional statutory guidance under Section 18 of the Traffic Management Act 2004 (“the act”). It applies to all highway authorities in England, who are required to have regard to the guidance to deliver their network management duty under the act. It is effective from the date of publication and replaces the guidance published on 9 May 2020 and updated on 23 May 2020 and 13 November 2020.
  - 11.14. It does not replace the original [Network management duty guidance](#) published in November 2004, but provides additional advice. In particular, it may guide authorities in how to make permanent and capitalise on changes made during the pandemic, to help meet the ambitions set out in [Gear change](#).
  - 11.15. This guidance sets out high-level principles to help local authorities to manage their roads and what actions they should take. It also specifies that Authorities should monitor and evaluate any temporary measures they install, with a view to making them permanent, and embedding a long-term shift to active travel as we move to recovery. In assessing how and in what form to make schemes permanent, authorities should collect appropriate data to build a robust evidence base on which to make decisions. This should include traffic counts, pedestrian and cyclist counts, traffic speed, air quality data, public opinion surveys and consultation responses. Furthermore it states that consultation and community engagement should always be undertaken whenever authorities propose to remove, modify or reduce existing schemes and whenever they propose to introduce new ones
  - 11.16. In addition TfL issued their Streetspace for London guidance in May 2020 now with March 2021 amendments supports councils to identify and plan improvements to help people safely walk, cycle and use public transport during the coronavirus pandemic. TfL have provided boroughs with data and analysis for identifying schemes and guidance on how to deliver them to best meet the aims of the Streetspace programme and how to monitor their outcomes.

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- 11.17. The Council enforces parking and moving traffic contraventions under the provisions of the London Local Authorities and Transport for London Act 2003. Enforcement against contraventions of signs placed prohibiting entry by vehicles to roads which are bus routes or emergency services routes may be taken under the provisions section 4(5)(b) of this act, which to section 36 of the Road Traffic Act 1988 which makes it an offence to fail to comply with the indication of a traffic sign which has lawfully been placed on or near a road. A sign is so lawfully placed if the indication is of a statutory prohibition, restriction or requirement. Such signs must conform with the Traffic Signs Regulations and General Directions 2016.
- 11.18. Where the Council undertakes consultation whether statutory or not any consultation responses must be considered by the Council with a receptive mind and it must be prepared to change course if persuaded. However there is no duty to adopt the views of consultees.
- 11.19. The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 11.20. In summary, the Council must, in the exercise of its function, have due regard to the need to:
- 11.21. eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- 11.22. advance equality of opportunity between people who share a protected characteristic and those who do not;
- 11.23. foster good relations between people who share a protected characteristic and persons who do not share it.
- 11.24. The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 11.25. The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:  
<https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>.
- 11.26. The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- The essential guide to the public sector equality duty
  - Meeting the equality duty in policy and decision-making
  - Engagement and the equality duty
  - Equality objectives and the equality duty
  - Equality information and the equality duty

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11.27. The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>.

## **12. Equalities implications**

12.1. A full Equalities Impact Assessment (EqIA) has been carried out on the Lewisham and Lee Green Low Traffic Neighbourhood. The EqIA can be seen in Appendix J and obtains the full assessment for each protected characteristics.

12.2. The Equality Impact Analysis shows that the current LTN measures impact all groups positively overall and in particular the ones that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers, members of the LGBT community and BAME groups. This is because the scheme has shown being successful at generally decreasing traffic levels and speeds.

12.3. Quieter streets mean less noise and vibrations, increased road safety and natural surveillance, due to more people able to walk and cycle safely, increased opportunities for all to be active on the streets, more space on the carriageway for people using various wheeled transport equipment such, tricycle, adapted cycles, cargo-bikes, more and quieter space to play, stop and chat with neighbours, increased footfall and cycle flows supporting a vibrant local economy, more space and time to enjoy streets architectural and natural features, more opportunities to access facilities for people that found that using public transport or a car was too expensive and a lower carbon footprint overall.

12.4. The Equality Impact Analysis did highlight some potential negative impacts on the protected groups.

12.5. The negative impacts are related to the requirement for those using a motor vehicle to use alternative routes to reach their destination in the area, which may be longer. The negative impact is associated with the increased time, distance and cost for those using a motor vehicle to reach their destination. It should be noted that all properties remain accessible by motor vehicle and there are other ways to travel which will be improved by the proposals including for those who walk and cycle. The main negative impact therefore is on those people where the use of a motor vehicle to travel across the area to reach their destination is essential.

12.6. As part of this assessment, it is recognised this could be those people that are disabled, elderly, mobility impaired, or care for a relative or friend that need to use a motor vehicle to travel across the area.

12.7. In order to reduce and limit the negative impacts that have been identified a number of key suggestions have been made details of which can be found in appendix J.

12.8. It is recognised that for some protected groups that have to take journeys by motor vehicle, may be disproportionately negatively impacted, however, the impact of longer journey times for some people is deemed to have been reduced by the improvements for the opportunity for independent travel provided by the proposals and the expected improvements to air quality, safety, noise and wellbeing benefits to these groups.

## **13. Climate change and environmental implications**

13.1. There is a legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that

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part. Encouraging more journeys to be made by walking and cycling rather than private transport will help to protect against a car based recovery from the COVID-19 pandemic, and the negative impacts associated with vehicular traffic. Keeping traffic and congestion to a minimum will help maintain the improved air quality that has been experienced under lockdown conditions. This will, in turn, help in achieving the objectives set out in the Council's Air Quality Action Plan and Climate Emergency Action Plan.

## 14. Crime and disorder implications

- 14.1. There have been a number of incidents of vandalism affecting the physical restrictions and ANPR cameras within the LTN and the Council has been liaising with the Police to take action to stop criminal damage. The recommendation that all remaining physical modal filters be changed to camera enforced variants is expected to reduce levels of vandalism and relevant operational costs.

## 15. Health and wellbeing implications

- 15.1. Many residents have had reason to adapt their daily routines as a result of the COVID-19 pandemic. Looking back at the 3 years to 2017/18, on average only 35% of residents were walking or cycling for at least 10 minutes twice a day (or a single block of at least 20 minutes). Over half of the adult Lewisham population, and 37% of 10-11 year old and 21% of 4-5 year olds are overweight or obese. Road Transport is also the biggest contributor to NOx and PM10 emissions, contributing 64% and 55% of total emissions respectively. As a result of the COVID-19 pandemic an increase in walking and cycling for local trips has been observed, particularly given the current fears over public transport use and limited capacity. The lower traffic volumes are thought to have given people greater confidence to cycle, that they may not otherwise have.
- 15.2. In order to protect public safety it is important that people are able to walk/cycle whilst maintaining social distancing recommendations. The Council must take steps to minimise road danger, where possible.
- 15.3. It is recognised within the government and TfL guidance that the introduction of the temporary measures to support walking and cycling may help to change travel habits, which may be sustained beyond the current pandemic, leading to longer term public health benefits. This would increase resilience against current and future pandemics.

## 16. Background papers

- 16.1. Transport Strategy and Local Implementation Plan 2019-2041 (LIP3)  
<https://lewisham.gov.uk/inmyarea/regeneration/transport-and-major-infrastructure/local-implementation-plan>
- 16.2. Overview & Scrutiny Business Panel meeting of 26 May 2020 – Item 3.  
<http://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=121&MId=5983&Ver=4>
- 16.3. Reallocating road space in response to COVID-19: statutory guidance for local authorities (DfT May 2020) <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities>
- 16.4. London Streetspace Plan: interim guidance for boroughs (TfL May 2020)  
<http://content.tfl.gov.uk/lsp-interim-borough-guidance-main-doc.pdf>
- 16.5. Corporate Strategy 2018-2022  
<http://councilmeetings.lewisham.gov.uk/documents/s61022/Draft%20Corporate%20Strategy%202018-2022.pdf>

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- 16.6. Lewisham Air Quality Action Plan (2016-2021)  
<https://www.lewisham.gov.uk/myservices/environment/air-pollution/Documents/LewishamAirQualityActionPlanDec2016.pdf>
- 16.7. Letter from St Barts Hospital to Islington Council (May 2020)  
<https://twitter.com/WalkIslington/status/1262317851349864448?s=20>
- 16.8. Local Authority Parking and Traffic Management Operational Advice during Covid-19 (London Councils April 2020)  
<https://www.londoncouncils.gov.uk/services/parking-services/operational-advice-during-covid-19>.
- 16.9. Traffic orders: advertising during coronavirus (COVID-19) (DfT April 2020)  
<https://www.gov.uk/government/publications/traffic-orders-advertising-during-coronavirus-covid-19>
- 16.10. Implementation of temporary measures to support safer walking and cycling in response to the COVID 19 pandemic (2020)

## 17. Glossary

- 17.1. The table below includes a glossary of terms, abbreviations and acronyms used in this report.

Term	Definition
DfT	Department for Transport
ETO	Experimental Traffic Management Order – a legal order made by a Local Authority which manages the behaviour of all road user where consultation is carried out after the order becomes live, with the restrictions already in place. This type of order may be in place for up to 18 months.
Modal filter	A road closure that stops motor vehicles, but which still allows pedestrians and cyclists (including electric cargo cycles) and powered two wheelers through.
Modal shift	The change from one mode of transport to another, such as from car to bicycle or public transport.
School street	Streets or parts of streets that are closed to vehicular traffic for part of the day at school pick up and drop off, while schools are open.
TfL	Transport for London
TLRN	Transport for London Road Network – a network of roads for which Transport for London is the Highway Authority.
TMO	Traffic Management Order – a legal order made by a Local Authority which manages the behaviour of all road users and which is consulted on prior to restriction being made live.

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Term	Definition
TTO	Temporary Traffic Order – an order made by a Local Authority to restrict or prohibit traffic on the road for road works, where there is a likelihood of danger to the public or to allow litter and cleaning duties to be carried out. Normally requires a notice of intent for at least 7 days before.
TTRN	Temporary Traffic Regulation Notice – a notice which may be used to immediately put into effect a TTO where it appears to a Local Authority that the restriction or prohibition should come into force without delay.
Zero carbon	Achieving net zero carbon dioxide emissions by balancing carbon emissions with carbon removal or simply eliminating carbon emissions altogether.

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## 19. Appendices

- A. Map of consultation area
- B. Map of original LTN
- C. Map of revised LTN
- D. Consultation leaflet
- E. Monitoring strategy June 2021
- F. Consultation FAQs
- G. Consultation engagement report
- H. Summary of findings and concerns
- I. Options appraisal
- J. Equalities Impact Assessment
- K. Monitoring report November 2021

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