



HIGHGATE SOCIETY

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London N6 6BS

18 August 2024

Camden Council and
Islington Council
c/o SafeTravel@camden.gov.uk

Dear Sir/Madam,

The Dartmouth Park Healthy Neighbourhood (DPHN) traffic proposal published on 8 July 2024

Objection: The Highgate Society objects to the DPHN traffic proposal published on 8 July 2024 for the following reasons:

1. No Clear Statement of the Scheme's Aims: There is no clear explanation as to why this proposal has been put forward over others. The scheme's objectives, as stated on the Commonplace website, aim to make the area greener, healthier, and safer, with reduced traffic and improved conditions for local businesses. However, these objectives remain vague and have not been developed into specific, measurable targets.

2. No Whole-of-Area Consideration: For a scheme of this magnitude, which covers an unusually large area encompassing 45 streets and parts of multiple neighbourhoods, thorough research and detailed planning, and a whole-of-area view

are essential. However, the absence of rigorous data and analysis to connect the scheme's very general aims with its proposed measures raises significant concerns. The general aspirations for safer and healthier streets are laudable, but without data to support the likelihood of achieving these goals, they remain aspirational.

The scheme also does not adequately address the specific characteristics of the area. Highgate, with its hilly terrain and complex road conditions, presents unique challenges that have not been sufficiently considered. Large areas are already closed to vehicles, including the Holly Lodge area, Hampstead Heath, Highgate Cemetery, and Waterlow Park. The Dartmouth Park area itself is already a cluster of low traffic areas, unlike most surrounding areas. This failure to consider the whole of the area undermines the scheme and increases the risk of unintended consequences, particularly increased congestion in surrounding areas.

3. Very Poor Engagement and Explanation: The engagement process for this proposal has been deeply flawed. The Highgate Society, representing over 1300 members, has long advocated for improvements in public transport, traffic management, and positive environmental measures. However, the Councils have not provided a satisfactory level of engagement with residents and businesses, particularly given the scale and impact of the proposed DPHN scheme.

The timing of the consultation, running for just six weeks from 8 July to 18 August 2024, was poorly chosen, coinciding with the summer holiday period when many residents are away. This limited timeframe has severely restricted meaningful participation, leading to widespread dissatisfaction and mistrust of the Councils. The Highgate Society and other local organisations warned the Councils of this timing issue at an early stage and made two formal representations requesting an extension. We also organised a petition that was signed by 2,308 people which we presented to Camden Council calling for an extension. Despite this, the Councils proceeded without any adjustment.

The quality of the consultation materials has been inadequate. The information provided lacks clarity and detail, making it difficult for residents and businesses to understand the full implications of the proposal. The in-person engagement events were insufficient, with sessions limited to 30 minutes, being highly managed, and held on consecutive days, which were overbooked and resulted in residents being turned away. This level of engagement is far below what is necessary for a scheme of this scale and complexity.

The use of the Commonplace platform has further exacerbated these issues. Many older residents, who may not be as familiar with online platforms, have struggled to engage with the consultation process. The online survey also lacked any validation measures to prevent many responses being given by automated applications (“bots”). For example, there was no “captcha” feature, raising concerns about the accuracy and authenticity of the feedback collected through the survey. The Councils’ reliance on this platform, without addressing these shortcomings, has led to a consultation process that is neither inclusive nor effective.

4. Proposal Not Based on Proper Data or Projections: A significant flaw in the DPHN proposal is the lack of proper data and projections to support the scheme. Traffic origin and destination information, which is crucial for predicting the effects of traffic flow changes, has not been provided. This omission makes it impossible to assess the likely impact of the scheme on congestion and pollution in both the DPHN area and the surrounding boundary area. We note that on another proposal in Hampstead, a transport consultant has been appointed and will be using information from sources such as Google on actual routes through the area: so it is possible to do this.

The proposal also does not consider where and when traffic congestion is most severe, or how the scheme will affect traffic patterns during peak times. Without this data, the proposal is little more than guesswork, with no reliable way to predict whether the scheme will achieve its goals.

Furthermore, the proposal fails to account for the specific characteristics of the area, such as its hilly terrain or to consider older, less mobile residents who may not be able to adopt alternative forms of transport. The potential impact of congestion on bus routes, which are already limited in parts of the area, has also not been considered. This lack of consideration for local conditions further undermines the credibility of the scheme.

The absence of proper data means that there is no way to measure any outcome of the scheme. The proposal does not include any metrics for assessing whether the scheme has achieved any of its general goals, such as a healthier and safer area. This is a fundamental flaw, as it leaves the Councils without any way to determine whether the scheme is working or needs to be adjusted.

The lack of data is particularly concerning given the scale of the DPHN scheme. This is the largest traffic scheme proposed for the area in decades, and it is essential that it is based on robust data and analysis. Without this, the scheme is unlikely to achieve its goals.

5. Scheme Seems Extremely Likely to Cause Even Greater Congestion in Boundary Areas and may have adverse consequences for businesses: One of the most significant risks associated with the DPHN proposal is the potential for increased congestion in the boundary areas surrounding the scheme. The proposal does not adequately address the likely displacement of traffic from within the DPHN area to the surrounding roads, which could lead to even greater congestion and pollution in these areas.

For example, the proposal shows that westbound traffic will be rerouted from Dartmouth Park Hill via Highgate Hill/High Street and Highgate West Hill or via Junction Road, all of which are already heavily congested at many points in the day. The lack of data on traffic flows and the absence of any analysis of the likely impact on these boundary roads is a serious oversight. Without this information, it is impossible to assess the likely impact of the scheme on congestion in these areas, raising the risk of significant unintended consequences.

The potential for increased congestion in boundary areas is not just a theoretical concern. The Highbury low traffic neighbourhood (LTN) in Islington resulted in a 58% increase in traffic in Blackstock Road, a boundary road for the LTN. As the increased congestion pushed traffic onto other routes, later measurement found a lesser increase of 32% (or 3,837 daily vehicles). Despite this increase in traffic in Blackstock Road the Highbury Park LTN was nevertheless made permanent by Islington. An increase in traffic of 58% or even 32% is very significant, and residents and businesses on boundary roads are understandably concerned that they might suffer similar traffic increases. They are not reassured by explanations based on generalities. We accept that there are different experiences across LTNs, but we see the risk of adverse outcomes as significant where an LTN (as in this case we believe) is poorly designed.

The DPHN proposal also fails to consider the impact of increased congestion on local businesses. Many businesses rely on the free flow of traffic for deliveries and customer access, and increased congestion could have serious economic consequences. The Councils have a responsibility to consider these impacts in their planning, yet this has not been done.

6. No Consideration of Pollution or Where Most Congestion Is Experienced:

The DPHN proposal fails to adequately address issues of pollution particularly due to congestion, which are key concerns for residents and businesses. The scheme's stated aim of improving air quality is not backed by any specific data or analysis, and there is no mention of how the scheme will address the areas where pollution is currently worst.

Camden has access to air quality information through the Airscape monitoring network, but this appears not to have been used. There is no information on how the scheme will impact air quality in different parts of the area, or how the Councils plan to measure these impacts. This is a serious omission, given the importance of air quality to public health.

Similarly, the proposal does not address where congestion is currently most severe or how the scheme will affect these areas. The boundary roads of Highgate Hill, Highgate High Street, Highgate West Hill and Highgate Road, Fortess Road and Junction Road already experience significant air quality and pollution issues, yet this has not been adequately considered. The lack of detailed traffic flow data for these areas further compounds this problem, making it impossible to assess the likely impact of the scheme on air quality and pollution.

These are key issues for residents and businesses, and the Councils have a responsibility to address them in any traffic management scheme. The absence of proper data and analysis in these areas undermines the proposal's credibility.

7. No Consideration of How Far Residents and Businesses Can Adopt Alternative Travel or Specific Characteristics of the Area: The DPHN proposal does not consider the specific characteristics of the area or the extent to which residents and businesses can adopt alternative forms of travel. Highgate is a hilly area with limited public transport options, which presents significant challenges for residents who might otherwise switch to walking or cycling.

Older or less mobile residents may not be able to adopt alternative forms of transport. Similarly, businesses that rely on deliveries or customer access by car may be adversely affected by the proposed changes. The proposal does not adequately consider these factors, and there is no evidence to suggest that the Councils have taken them into account in their planning.

The failure to consider the specific characteristics of the area and the needs of residents and businesses is a significant oversight. A one-size-fits-all approach to traffic management is unlikely to work in this area, where the challenges are unique. The Councils need to take these factors into account.

8. We See No Evidence to Suggest That Traffic Will Just Disappear: When asked in an engagement meeting to explain the purpose of the proposal, a Council representative responded that the DPHN proposal assumes a significant proportion of traffic will disappear because of the scheme: i.e. it will bring down overall traffic levels. However, there is no evidence to support this assumption, and it appears to be based more on wishful thinking than on any robust analysis.

The assumption that traffic will disappear is particularly problematic in an area like Highgate, and the proposal does not consider the characteristics of the area described in section 7. Without considering these factors, it is unrealistic to expect that the number of traffic journeys will fall significantly.

Furthermore, given the location of the area, many traffic journeys begin and end outside the area. In many cases, the journeys will be business or service vehicles, which will need to make their journey, regardless of any restrictions. We see no evidence given to suggest that this will change. The failure to provide any evidence to support the assumption that traffic will disappear is a serious flaw in the DPHN proposal given that the assumption underpins much of the proposal.

9. We Believe There Are Several Legal Issues with This Proposal: See Appendix 1: In addition to the concerns outlined above, we believe there are several legal and regulatory issues with the DPHN proposal, which are detailed in Appendix 1. These issues include a failure to comply with statutory guidance on the implementation of LTNs and the failure to conduct a fair and proper consultation.

The design and implementation of LTNs are subject to government guidance and case law concerning the conduct of consultations by public authorities. The Supreme Court's guidance in *R (on the application of Moseley) v London Borough of Haringey* [2014] UKSC 56, which outlines the requirements of a fair consultation, has not been

followed in this case. Specifically, the Councils have not provided sufficient reasons for the proposal to permit intelligent consideration and response, nor have they allowed adequate time for consultation.

The statutory guidance on implementing LTNs also requires that schemes have clear aims and objectives, with measurable metrics of success, and that they consider the impact on journey times, traffic displacement, and accessibility. The DPHN proposal does not meet these requirements, raising serious questions about its legality.

10. Highgate Society Is Listening to the Concerns of Our Members and Other Residents and Businesses Across the Whole Area: The Highgate Society has been actively listening to the concerns of our members and other residents and businesses across the whole area. This includes residents and businesses from Junction Road, Kentish Town, Fortess Road, Haringey and most roads within Dartmouth Park and the LTN. We have received over 280 pages of emails (more than 100,000 words) expressing concerns about the DPHN proposal, and the level of anxiety and opposition to the scheme is clear.

We have taken steps to inform the community about the proposal, including sending emails, setting up a joint action website (as a collaboration hub for local civic organisations), organising local publicity, and holding an information afternoon. This is in no way a substitute for proper publicity and engagement which the Councils should have carried out.

The Councils have a responsibility to listen to the concerns of residents and businesses and to ensure that any traffic management scheme is based on robust data and analysis. The failure to do so in this case has led to widespread distrust and opposition to the DPHN proposal.

11. In Appendix 2 You Can See Quotes from a small selection of the Objections to This Proposal Residents and Businesses Have Shared with the Highgate Society: These quotes highlight the high level of anxiety and concern that the proposal has generated within the community based on the proposal made available on the Commonplace website which respondents have reviewed carefully. The concerns raised by residents and businesses include the likely increase in congestion and pollution, the impact on local businesses, the impact on boundary roads, school safety, and the lack of proper consultation and engagement, all of which we share. These concerns have not been adequately addressed by the Councils, and the failure to do so has heightened opposition to the scheme.

The Highgate Society believes that the Councils need to take these concerns seriously and to engage in a meaningful dialogue with the community. The current proposal does not reflect the needs of the residents and businesses in the area, and the Councils must consider the concerns that have been raised.

12. Even the Basic Data Shown Has Not Properly Covered the Highgate Area, and This Shows an Unequal Treatment: The basic traffic count data provided in the proposal does not cover the Highgate village area, where congestion is already a problem, or any parts of Haringey. This highlights a significant oversight in the planning process and reinforces the point that the Councils have failed to show a whole-of-area focus or work with a neighbouring council where streets are significantly affected by the proposal.

This lack of data makes it impossible to assess the likely impact of the scheme on Highgate, raising concerns about the fairness and effectiveness of the proposal. The Councils have a responsibility to ensure that all areas affected by the scheme are adequately considered and that decisions are based on comprehensive and accurate data.

13. The Boundaries, and Surrounding Areas Are Treated as an Afterthought: The proposal focusses on the area within the LPN, with little consideration given to the impact on the boundary and surrounding areas. This lack of attention is concerning given the potential for increased congestion and pollution in these areas. Without proper consideration of the impact on these areas, the DPHN proposal risks exacerbating existing problems rather than solving them.

The Councils need to take a more holistic approach to the DPHN, ensuring that all parts of the scheme, the boundaries, and surrounding areas are given equal consideration in the planning process.

14. Relying Heavily on an Experimental Traffic Order Is Not a Satisfactory Way to Proceed or a Proper Use of Public Funds: Residents and Businesses Must Not Be Involuntary Subjects in a Poorly-Designed Traffic Experiment: The DPHN proposal relies heavily on the use of an Experimental Traffic Order (ETO) to implement the scheme, a strategy that we believe is not a satisfactory way to proceed or a proper use of public funds in this case. In the case of the DPHN, the reliance on an ETO raises concerns that the scheme has not been properly thought through and that residents and businesses are being treated as involuntary subjects in a poorly designed traffic experiment. The lack of data and analysis, the failure to consider the specific characteristics of the area, and the absence of any clear metrics for assessing the success of the scheme all show that the DPHN is not appropriate, even on an experimental basis.

The use of an ETO should only be considered after a thorough and rigorous planning process, with all potential impacts fully assessed and mitigated. In this case, the DPHN proposal falls far short of these standards.

15. We Remain Ready to Engage with the Councils on Any Properly Formulated Proposal, Addressing the Above Points and Allowing Sufficient Time for Everybody to Understand and Engage: The Highgate Society remains ready to engage with the Councils on any properly formulated proposal that address all the concerns outlined above. We urge the Councils to reconsider the DPHN proposal taking account of the concerns raised by residents and businesses, and allowing sufficient time for meaningful engagement and consultation.

16. We Appreciate This Is a Co-Design Phase, but with the Poor Data for the Proposal It Is Not Practical to Propose Any Meaningful Improvements. The Whole Plan Needs to Be Reconsidered: We appreciate that the DPHN proposal is a co-design phase, but with the poor data and lack of proper analysis, it is not practical to propose any meaningful improvements at this stage. The whole plan needs to be reconsidered, with a focus on addressing the fundamental flaws identified in this response.

The co-design phase should be an opportunity for residents and businesses to work collaboratively with the Councils to develop a scheme that meets the needs of the community. However, this can only be achieved if the proposal is based on robust data and analysis, with clear and measurable objectives.

We believe that the current proposal does not meet these criteria and that the co-design phase has been compromised by the lack of proper planning and engagement. We would urge the Councils to reconsider the DPHN proposal, with a focus on sound evidence and the needs of the community.

17. While Dartmouth Park Traffic Discussions Have Been Happening for Several Years, This Co-Design Phase Is the First Time Residents and Businesses Have Seen any Substantive Proposal: It is important to note that while discussions about traffic management in Dartmouth Park have been happening for several years (in which the Highgate Society has engaged, and highlighted traffic safety issues), this co-design phase is the first time that residents and businesses have seen any substantive proposal. The scale and scope of the DPHN proposal is unprecedented, and many residents and businesses are not aware of their implications. It is also very disappointing that the safety issues that Highgate Society has previously pointed out to Camden Council have not been addressed, particularly on West Hill and Highgate Hill, and are likely be made worse.

This highlights the importance of ensuring that the co-design phase is conducted properly, with adequate time for engagement and consultation. The current six-week timeframe is simply not sufficient for residents and businesses to fully understand the proposal and provide any meaningful feedback.

The Councils need to recognize that the DPHN is a complex and far-reaching scheme that requires careful consideration and planning. Rushing the co-design phase alienates the community and undermines the credibility of the proposal.

18. We Accept That Traffic Management Is Necessary, and We Are Hugely Concerned About the Environment, Congestion, and Pollution: The Highgate Society accepts that traffic management is necessary, and we fully share the Councils' concerns about the environment, congestion, and pollution. We believe that effective traffic management can play a key role in addressing these issues and improving the quality of life for residents and businesses in the area.

However, we also believe that traffic management must be based on sound evidence and must consider the specific characteristics of the area. The DPHN proposal, as currently formulated, does not meet these criteria, and we believe it is highly unlikely to achieve the desired goals.

We urge the Councils to take a more evidence-based approach to traffic management, with a focus on addressing the root causes of congestion and pollution and meeting the needs of the community.

19. Looking at the Whole Area, This Proposal Is Highly Likely to Have Adverse Consequences in Relation to the Environment, Congestion, and Pollution: Considering the likely displacement of traffic to boundary roads, the potential increase in journey lengths, and the failure to consider the specific characteristics of the area all raise serious concerns about the impact of the scheme.

The proposal does not adequately address the issue of traffic displacement, or increased congestion and pollution on boundary roads. The assumption that traffic will simply disappear is not supported by evidence, and the likely increase in journey lengths will exacerbate existing congestion.

The failure to consider the specific characteristics of the area, such as its hilly terrain and the needs of less mobile or older residents, further undermines the credibility of the proposal. A one-size-fits-all approach to traffic management is unlikely to work in this area, and the DPHN proposal does not reflect the needs of the community.

20. That Is Why We Are Objecting to This Proposal. The Area Deserves Better Than This: The Highgate Society is objecting to the DPHN proposal because we believe that the area deserves better than this. The current proposal is not based on sound evidence, does not consider the specific characteristics of the area.

We believe that the Councils need to reconsider the DPHN proposal. Any viable scheme must be based on robust data and analysis, have clear and measurable objectives, and address the concerns of all residents and businesses.

The Highgate Society remains ready to engage with the Councils on any properly formulated proposal that meets these criteria, and we urge the Councils to engage with the whole area to understand its needs.

Yours faithfully

Andrew Sulston
Chair, Highgate Society

Appendix 1

Legal and regulatory context

The design and implementation of LTNs is subject to government guidance, and to case law concerning the conduct of consultations by a public authority. In March 2024, the government published Statutory Guidance “Implementing low traffic neighbourhoods”¹ see <https://www.gov.uk/government/publications/implementing-low-traffic-neighbourhoods/implementing-low-traffic-neighbourhoods> This covers in particular good practice in engagement with the community and design principles for effective LTNs.

The consultation will need to comply with the Supreme Court’s guidance in *R (on the application of Moseley) v London Borough of Haringey* [2014] UKSC 56. At this stage the guidance at [25] of that judgment applies: “the product of consultation must be conscientiously taken into account in finalising any statutory proposal.”²

The requirements of a fair consultation are as summarised in the case of *R v Brent London Borough Council, ex p Gunning*, (1985) 84 LGR 168: “*First, that consultation must be at a time when proposals are still at a formative stage. Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Third,... that adequate time must be given for consideration and response and, finally, fourth, that the product of consultation must be conscientiously taken into account in finalising any statutory proposals.*” [25]. Fairness may require that interested persons be consulted not only upon the preferred option but also upon discarded options [27].³ Camden has recently accepted that this is the ruling case relating to consultations by local authorities.

Specifically describing this stage as ‘not a consultation’ does nothing to reduce, let alone remove, the Councils’ duty of fairness.

Statutory Guidance on implementation

Under the March 2024 Statutory Guidance “Implementing low traffic neighbourhoods” includes a section on design principles for effective LTNs. It states:

“Schemes should have clear aims and objectives, with a rationale and evidence to support intervention and measurable metrics of success. In determining whether to implement an LTN, decisions should be taken with reference to wider local policy objectives such as those set out in a local transport plan. Making the link between decisions on individual schemes, and strategic local policies which have been consulted on and signed off by local elected members, will help set the scheme in

¹ see <https://www.gov.uk/government/publications/implementing-low-traffic-neighbourhoods/implementing-low-traffic-neighbourhoods>

² See <https://www.supremecourt.uk/cases/uksc-2013-0116.html>

³ See <https://www.supremecourt.uk/cases/uksc-2013-0116.html>

context and reassure communities that local democratic processes have been followed.”

“Possible impacts should be considered, and mitigations identified and developed. This should include the impact on journey times both within the LTN and on boundary roads, the possibility of traffic displacement, impacts on emergency services and local businesses.”

“Schemes should be designed to be accessible to all. Accessibility requirements and the Public Sector Equality Duty apply to all measures. In making any changes to their road networks, authorities must ensure that measures are designed and delivered in a way that enables them to comply with equalities legislation. An equality impact assessment can help identify impacts of proposed schemes.”

“A mix of [engagement] approaches should be taken, including as a minimum: information leaflets delivered to all properties within the area of the scheme and a scheme-appropriate radius of properties outside the area.”

The Guidance goes on to say:

“Levels of engagement, and resultant levels of local awareness and support for proposed traffic management schemes should be proportionate to their scale and impacts. Where the scope of a scheme is geographically broad, so should engagement and levels of support be. Where changes to local roads are significant, so should levels of local awareness and support be.”

The Guidance continues:

- *“Via its engagement and consultations an authority should be confident that a scheme is capable of carrying the support of a majority of the community before introducing it.”*
- *“Any online engagement or consultation materials should comply with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 to ensure they are accessible to disabled people.”*
- *“Where the scope of a scheme is geographically broad, so should engagement and levels of support be.”*

The Public Sector Equality Duty says in section 149 (1) of the Equalities Act “A public authority must, in the exercise of its functions, have due regard to the need to ... (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.”⁴ Relevant protected characteristics include: age; disability; and pregnancy and maternity.

⁴ See <https://www.legislation.gov.uk/ukpga/2010/15/section/149>

3. Assessment of the DPHN scheme against these requirements

Our preliminary assessment is that the DPHN scheme:

- Does not have “clear aims and objectives, with a rationale and evidence to support intervention and measurable metrics of success”. The aims and objectives are vague and no targets have been set against which success could be measured.
- Does not refer to or align itself with the Highgate Neighbourhood Plan which includes a section on traffic and transport. It has been the subject of a local referendum and approved by both Camden and Haringey.
- Does not consider possible impacts and mitigations, including:
 - the impact on journey times both within the LTN and on boundary roads
 - the possibility of traffic displacement
 - impacts on emergency services, particularly given the locations of the Whittington Hospital and the Royal Free Hospital. In addition to emergency services, both in-patients and out-patients may be significantly affected by this proposal. We have been copied on several responses to the consultation which have raised particular concerns for elderly and disabled residents living in the west of the area about access to the Whittington Hospital.
 - impacts on local businesses
- Does not consider the application of the equalities legislation. The DPHN scheme must have due regard to its impact on protected groups, particularly the elderly, disabled and pregnant.
- Has not involved appropriate engagement and very clearly information has not been delivered to addresses both inside and outside the LTN.

Overall, this scheme falls far short of a well-researched and supported proposal that would be in line with government Guidance.

4. Definition of the area and importance of Neighbourhood Plans

Low traffic neighbourhoods start with a line being drawn around the proposed area. This is the most momentous of the decisions and it is one on which there has been no consultation. The area within it will be subject to the traffic reduction measures, and the area outside, particularly boundary roads, will not. In this case, the LTN is large and covers an area that includes parts of several neighbourhoods. It includes parts of two neighbourhood plan areas (Highgate and Kentish Town) and the whole of a third (Dartmouth Park). Neighbourhood planning areas have been in existence for a decade and each has been adopted following referendums involving local residents.

The 15-minute city is a long-established planning concept which looks at neighbourhoods as areas within which residents can obtain substantially all their daily needs within a 15 minute walk. The proposed DPHN is too large to form a neighbourhood on these terms, and it is not based on any assessment of the

neighbourhoods created by the routes residents travel – where they shop, go to the GP surgery and so on. The DPHN has not considered where the real communities and local travel areas are and in doing so ignores decades of knowledge on how communities work and the existing statutory framework of neighbourhood plans. This is a serious omission.

The Highgate Neighbourhood Plan sets out priorities for traffic and travel in Highgate, but these have not been considered. The illogical drawing of the LTN boundary down the middle of the Highgate Neighbourhood Plan area is the cause of many of the issues raised by residents and businesses in the Haringey part of Highgate.

Appendix 2

Quotes from a small selection of the Objections to This Proposal Residents Have Shared with the Highgate Society

The Highgate Society has seen over 280 pages of consultation responses to the Councils (more than 100,000 words) expressing significant concerns about the DPHN proposal.

1. Criticism of the Consultation Process

Many residents were critical of the consultation process, feeling it was insufficient, poorly timed, and did not adequately engage the community.

- "It will also appear to many residents that Camden's decision to conduct this 'consultation period' through the peak summer holiday month has been strategically chosen to minimize opposition"
- "This rushed approach does not allow for adequate consideration and input from all affected parties."
- "I did attend one of these meetings and very much felt it was a box-ticking exercise"
- "The lack of clear and comprehensive data, particularly concerning traffic flow and pollution levels, raises significant doubts about the effectiveness of the proposed measures. Without accurate data, it is impossible to assess whether the scheme will achieve its stated goals."
- "The scheme appears to have been developed with several inaccuracies and without adequate on-the-ground review. Errors in proposed vehicle routes and a lack of consideration for existing traffic conditions highlight the need for a more thorough and realistic assessment."
- "Details of the numbers and distribution of responders to the various surveys in which the Councils have obtained such information which has led them to suggest that there is " a local desire " for such measures are both sketchy and inadequate. The plans as presented, with multiple maps; details of road closures; changes in traffic flows; one way streets; traffic cameras etc. are confusing. Some will find them bewildering. Asking residents to read, understand, discuss and respond to such complex issues during the main Summer holiday period when many are away is completely unacceptable. Many may feel it smacking of a deliberate attempt by the Councils to push through a potentially unpopular measure."
- "The proposal outlined in the [Proposal Overview](#) for a LTN [low traffic neighbourhood] are described as Camden and Islington working in partnership and yet the proposal will have a significant effect on Haringey but

who have not been included and yet that is where much of the 'dispersed' traffic is directed."

- "Errors in proposed vehicle routes and a lack of consideration for existing traffic conditions highlight the need for a more thorough and realistic assessment."
- "It is crucial to engage in a more thorough consultation process with the community to develop a balanced and effective plan."
- "This rushed approach does not allow for adequate consideration and input from all affected parties."
- "The manner in which the residents of the area affected by the proposals were notified of it causes concern. The proposal was published on 8 July online. I only heard about it from my family members who credit the efforts of the Highgate Society in alerting the public."

2. Impact on boundary roads and surrounding areas

Most responses referenced the adverse impact the scheme would have on the boundaries and surrounding areas.

- "The proposed changes are likely to lead to significant traffic congestion in the surrounding areas, contradicting the aim of reducing traffic within Dartmouth Park."
- "The South Grove proposals are impractical and unworkable. The width of South Grove is constrained and unable to support simultaneous two-way traffic."
- "The proposed closures of key roads such as Swain's Lane and Dartmouth Park Hill will likely lead to increased traffic congestion and pollution on perimeter roads. "
- "The proposal completely disregards the actual conditions of the roads in this vicinity which are narrow particularly at Pond Square and St. Michael's Terrace and already suffer from severe congestion during peak hours."
- "This scheme has been 'cobbled together' by one or more councillors living in the Dartmouth Park area, ignoring the significant impact it will have on the Highgate Village community."
- "This merely relocates the problem rather than addressing the root cause."
- "The proposal completely disregards the actual conditions of the roads in this vicinity which are narrow particularly at Pond Square and St. Michael's

Terrace and already suffer from severe congestion during peak hours. The shift merely relocates the problem rather than addressing the root cause."

- "Cholmeley Park is already difficult to navigate, especially at the top end near Channing School. Introducing further restrictions without considering the cumulative impact on the entire area will exacerbate existing issues, not solve them."
- "We are not an 'out of town' self-contained residential area which can be treated in isolation. Traffic displacement and increased pollution must be taken into account. Listen to what we as residents have to say and work with us. We all want healthy streets, but we need a holistic approach. These proposals are not it!"

3. Traffic Congestion and Pollution

Concerns about increased traffic congestion and its consequent impact on air and noise pollution were among the most frequently mentioned issues. Many residents emphasised how the proposed changes would exacerbate already significant problems on specific streets and negatively affect the overall environment.

- "Under this proposal, Highgate West Hill, Highgate Road, Highgate Hill, and Highgate High Street will all be exposed to more pollution. Highgate Village itself will be exposed to more pollution, more health hazards, and the continuous stress and dangers brought by off-loaded traffic from the inner Dartmouth Park area streets."
- "The traffic situation is terrible. We urge the Council to spend meaningful time at these areas before suggesting sending more traffic down the street, which will be unsustainable. ... High air and noise pollution levels are already unacceptable... residents are deterred from opening their street-side windows and/or spending time street side and the proposed changes will only exacerbate these issues."
- "The perimeter roads and main junctions are the most heavily used and polluted areas. It is hard to see the case for shifting traffic onto these roads when existing traffic restrictions mean many parts of the Dartmouth Park area are already a cluster of smaller low traffic areas which do not experience the same levels of pollution."
- "The diversion of vehicles to adjacent streets will inevitably increase congestion, air pollution, and noise in those areas."
- "At times, passing traffic going in the opposite direction involves much manoeuvring which is a cause of extra pollution. This is not good."

4. Impact on Schools and Children

Residents are concerned that the proposed changes will increase traffic around several schools causing serious health and safety concerns.

- “My children attend the local state schools on Highgate Road. I find it shocking that the people coming up with these proposals did not consider that they would force traffic onto roads next to three large secondary schools. How can proposals that increase pollution near schools ever be a good idea?”
- “There are numerous schools and childcare facilities that would be negatively impacted by these changes...Schools include Brookfield Primary School (only partially and incorrectly identified); La Sainte Union Girls School; William Ellis School, St Michael’s C of E Primary School, Highgate School and Channing Girls School. This proposal directs further traffic directly in front of schools and therefore there will be an increase in pollution. This is unacceptable and completely contradicts the proposal’s stated purpose to achieve a ‘safer and healthier’ area. “
- “Further down Highgate Road there are three schools, with large numbers of pupils outside at various times. Again, increasing traffic flow presents an obvious increase in hazards. This does not seem to be mentioned in the plan.”
- “Far from creating a “healthy” neighbourhood, this ludicrous plan increases safety concerns for all. My own daughter’s currently peaceful walk to school will, if this Proposal is implemented, be carried out in the fog and fumes of standstill traffic, amidst desperate commuters who are likely to take reckless actions to jump lights or drive on pavements in order to force their way through the deadlock as quickly as possible. The Proposal is downright dangerous.”

5. Safety Concerns

Safety concerns – for the elderly and young, pedestrians, cyclists, and for those with disabilities – were raised by many.

- “Highgate West Hill is used – at a huge risk – by cyclists and pedestrians, including the elderly and children, the less abled and partially sighted. Some individuals may have a choice as to whether to use the street or not – we residents do not; we have to use the street to access our home.”
- “The Council owes all residents a duty of care regarding road safety, clean air and public health. This includes people living on Highgate Road and Highgate West Hill. There is no clear reasoning for why already congested boundary

roads should absorb the pollution and through traffic of surrounding areas. Closing the north of Swain's Lane – where there are very few residents – would displace that traffic to the residential and densely populated Highgate West Hill.”

- “HGVs going up and down West Hill not only cause congestion, but because of the weak infrastructure of the street – this is not an arterial road – and the volume and type of traffic has a serious impact on it. In terms of type of traffic, the HGVs cause vibrations – particularly when going over speed bumps – damaging water and gas pipes.”
- “...while promoting cycling and walking is a positive initiative, the current infrastructure does not support a safe and practical transition for all residents. Without substantial investment in improving cycle lanes and pedestrian paths, the proposal risks endangering pedestrians and cyclists alike.”

6. Impact on Businesses

There is concern that the proposal does not take into account the impact of increased traffic on local businesses.

- “the economic impact on local businesses could be devastating. Reduced access for deliveries and customers could result in a decline in trade, leading to potential business closures.”
- “The adverse impact on local businesses should not be underestimated, nor should the further consequences if businesses suffer from the proposal and close, resulting in residents driving further to access services, or ordering online, seriously damaging the vitality of the local community and are counterproductive if the intention of the LTN is to reduce traffic.”
- "Reduced access for deliveries and customers could result in a decline in trade leading to potential business closures."