

10A South Grove Highgate London N6 6BS

Cllr Anna Wright
Copy: parties shown below

21 October 2024

Dear Anna,

## **Dartmouth Park Healthy Neighbourhood traffic proposals**

Many thanks for your email of the 20 September and the information provided.

**The DPHN traffic proposals:** Before responding on specific points, I would like to be clear about the Highgate Society's position on the DPHN scheme and the issues it raises.

Sustainability and pollution are at the heart of the Society's activities. We established our Sustainable Living group many years ago and regularly hold talks on topics such as embodied carbon in the built environment<sup>1</sup>, heat pumps<sup>2</sup>, electric vehicles<sup>3</sup>, and energy efficiency in traditional buildings<sup>4</sup>. We were actively involved in promoting Camden's Airscape pollution monitoring system when it was launched in April 2022 with a news item and a talk the same month<sup>5</sup>. Our earlier submission in March 2024 about the DPHN scheme took the "Healthy Neighbourhood" part of the title in good faith and referenced

<sup>&</sup>lt;sup>1</sup> https://highgatesociety.com/embodied-carbon-the-hidden-emissions-impact-of-your-building-works/

<sup>&</sup>lt;sup>2</sup> https://highgatesociety.com/heat-pumps-are-coming/

<sup>&</sup>lt;sup>3</sup> https://highgatesociety.com/place/sustainable-living/electric-vehicles-as-at-november-2018/

<sup>&</sup>lt;sup>4</sup> https://highgatesociety.com/energy-efficiency-in-traditional-buildings/

<sup>&</sup>lt;sup>5</sup> https://highgatesociety.com/airscape-pollution-monitoring-launched-in-camden/ and https://highgatesociety.com/camden-clean-air-initiative/

pollution data from this pollution monitoring network (sadly, the monitoring system was discontinued by Camden Council after an initial two years and the pollution data captured is no longer available online). We recognise that climate change is real, and that travel is a significant contributor to carbon emissions; and we recognise the serious impact of pollution on everyone's health. The Highgate Society was founded in 1966 out of campaigns against proposals for a huge gyratory system through Highgate and the widening of Archway Road, and we have never thought car travel was a good general solution for urban transport.

However, we believe environmental measures need to be rooted in clear objectives, strong community engagement and data-driven design. With 1,350 paid up members and a mailing list of 2,000, we have deep roots in the community and have been copied on 300 pages of emails with resident and businesses' views on the DPHN proposals. Pavements, streets, and the network of local roads, cycle lanes and buses are central to how residents live their lives and how businesses operate. For example, some businesses depend on vehicles for deliveries, and cycles (even if electric) are not an option. Residents may depend on carers where time spent travelling is time not available for caring duties. There are numerous examples.

Therefore, we have difficult and complex trade-offs. Issues of climate change and reducing pollution mean changes are needed but these must be done carefully and be based on thorough research. Care should be taken to bring community opinion along, based on openly provided and well explained reasoning that can be shown to be benefit the whole community.

Unfortunately, the DPHN proposals so far have been poorly researched and communicated. They seem to be a desktop exercise with no genuine local knowledge, that is largely disconnected with the actual issues that we and other groups have been raising. Within the community there are also still far too many who don't know about the DPHN proposals or don't understand correctly how these will impact them.

**Approach to any formal consultation**: I would like to respond to the points you made about a formal consultation. We understand there is some uncertainty about the timing of the start of any formal consultation, and potentially how long it would last but you have confirmed at least four weeks.

In your reply you say: "The formal consultation will involve publication of a more developed and refined scheme (while still not final) and a series of consultation events and opportunities including a consultation questionnaire and the call for responses will have to be directly communicated to all the addresses in the vicinity with individual door deliveries of notification of the consultation. It's a much bigger and more formal process than the informal engagement to date."

Our request that any consultation run for a far longer period: If the councils decide to proceed to a consultation, the experience of the co-design engagement stage makes clear that it would be impossible to undertake the consultation with the larger and more formal process you describe in just four weeks. We believe a minimum of 12 weeks is

required for a meaningful consultation. The size and complexity of the scheme makes comparison with other schemes difficult but for this scheme four weeks would be far too short. The present proposals would need a complete rethink with alternatives being presented and considered. This will take time.

The co-design engagement phase was almost universally seen as inadequate. The dates when it took place over the summer holidays, the length of time allowed and the number and conduct of the engagement meetings were widely seen as falling short of what should be expected. The proposals were badly presented and inadequately explained. They seemed rushed with simple errors, and even the questionnaire asked the wrong questions.

Consequently, we launched a petition on 25 July asking for an extension and in less than a month it had reached nearly 3,000 signatures, but despite this no extension was granted.

Our experience of the engagement stage reflects that found by the cross-party charity Demos in their May 2024 research report "Driving Disinformation: Democratic deficits, disinformation and low traffic neighbourhoods – a portrait of policy failure". It created a strong sense that the Councils were rushing through poorly thought-out proposals based on inadequate research.

As set out in the Highgate Society's response to the co-design phase, we have seen many pages of responses to the Councils expressing significant concerns about the proposals (now over 300): see our response on DPHNjointaction.com under "Submissions & Responses". This website serves as a collaboration hub for the 15 groups shown from across the affected area which are copied on this letter. Several residents have said that the rush to implement is driven by election dates.

There was significant resident pressure for us to become involved and we held a public meeting on 3 September at La Sainte Union to help address the democratic deficit<sup>8</sup>. The meeting was widely seen as allowing those who had not been able to get to a Council run meeting to have their say. All resident groups who wanted to speak were able to do so, and the members of the public who spoke were limited only by the time available. Supporters and opponents of the scheme were all given an equal hearing.

The petition asking for an extension to the 18 August engagement deadline was presented to Richard Olszewski, Leader of Camden Council on 16 August. The Monitoring Officer has determined that the petition is valid and, under Section 6 of the Council's Petition

<sup>&</sup>lt;sup>6</sup> https://demos.co.uk/research/driving-disinformation-democratic-deficits-disinformation-and-low-traffic-neighbourhoods-a-portrait-of-policy-failure/

<sup>&</sup>lt;sup>7</sup> https://dphnjointaction.com/about/

<sup>8</sup> https://dphnjointaction.com/3rd-september-24-public-meeting/

Scheme<sup>9</sup> it will be considered by the Culture and Environment Scrutiny Committee at its meeting on 11<sup>th</sup> November 2024 at 6.30pm.

While it now seems too late to extend the deadline for the co-design phase, we will be raising these significant concerns as to the engagement approach with the committee and making the case for a 12-week period for any formal consultation.

Yours sincerely

## Andrew Sulston Chair, Highgate Society

## Parties in copy

Name Group Councillors, Highgate Cllr Camron Aref-Adib Cllr Lorna Russell Ward, Camden **Cllr Janet Burgess** Councillors, Junction Cllr Sheila Chapman Ward, Islington Cllr Kaya Comer-Schwartz Cllr Nick Dacosta Councillors, Highgate Ward, Haringey Cllr Scott Emery Cllr Marsha Isilar-Gosling Cllr Adam Harrison Sustainability Lead, Camden Cllr Richard Olszewski Leader of the Council, Camden 25-56 Brookfield Mansions Joint Action Supporter Cholmeley and Causton Residents Association and 130 organisations members of the Cholmeley & Causton support group Dartmouth Park Conservation Area Advisory Committee **Dartmouth Park Road Residents Association** Friends of Highgate Library, Camden Highgate Conservation Area Advisory Committee Highgate Literary and Scientific Institution Highgate Neighbourhood Forum Highgate Road Estate Tenants and Residents Association **Highgate Society** Highgate West Hill Residents Association Holly Lodge Estate Committee Kentish Town Neighbourhood Forum Pond Square Residents Association Swains Lane Residents Association

<sup>&</sup>lt;sup>9</sup> https://democracy.camden.gov.uk/mgePetitionListDisplay.aspx