

## CULTURE AND ENVIRONMENT SCRUTINY COMMITTEE

MONDAY, 11 NOVEMBER 2024 AT 6.30 PM

By E-Mail to sola.odusina@camden.gov.uk for distribution to Committee members

Item 7 – Response to the Dartmouth Park Area petition

Written submission of Highgate Society

Presented by Charlotte Alderson and Andrew Sulston

The Highgate Society presents this petition on the Council's engagement process on the Dartmouth Park traffic proposals, widely understood to be a Low Traffic Neighbourhood or LTN [1].

Our petition addresses the six-week "co-design" phase, from 8 July to 18 August, over the main holiday season. The timing limited participation, raising concerns that the Council intentionally avoided scrutiny. This impression was reinforced by errors in the Council's documents, which created the sense that this was a desktop exercise rather than a genuine effort at engagement [2]. The LTN itself appeared poorly designed, lacking sufficient data, and with no explanation of why alternative traffic management measures were dismissed [3].

The Council held three brief engagement meetings for residents: two in person, lasting half an hour with strict attendance limits, and the third online, chaired by an external consultant. These sessions left residents feeling that their voices were not genuinely heard.

The Highgate Society, as a civic organisation for all of Highgate, was approached by many members and other residents across the whole area who sought better engagement. We responded by organising a 90 minute public meeting on 3 September at La Sainte Union School, with almost 300 participants. Groups from all sides of the debate were able to speak, and local ward councillors made opening and closing statements. Referring to the meeting, Cllr Camron Aref-Adib acknowledged "*this has been a lesson in terms of how we do our* 

engagement on such schemes." Cllr Anna Wright agreed that Camden "has not managed to... communicate well enough or to handle the engagement well enough, and that really needs looking at." [4]

Despite this, the meeting was no substitute for the Council's work. The feedback from the 13 organisations that asked to speak, and numerous individual speakers showed a large majority opposed to the LTN proposals. This opposition was not merely about convenience but raised significant concerns that, without a well-designed plan based on robust data, the LTN would lead to long-term congestion and pollution in surrounding areas, many of which are home to lower-income households who already suffer from high pollution levels.

True co-design, as defined by experts, requires participatory design that actively involves users, with design decisions postponed until co-design has taken place [5]. Camden's process fell far short of this, making the "co-design" label misleading.

Camden's response to the petition emphasises that this is only phase 2, but we believe the failures of this phase should not be dismissed lightly. The Council points to past community engagement particularly the April 2021 Design Charter, but that engagement focused on a different area and emphasised fairness, particularly that streets must be safe for all without negatively impacting those just outside the area [6].

Nationally, the Transport Secretary has stated that LTNs must be implemented with local community support [7]. We agree, and we share our councillors' view that Camden's delivery of the co-design phase was inadequate. This is why so many people signed this petition.

We believe it is insufficient to assume that phase 3 can rectify the poor co-design phase. We respectfully ask the Committee to recognise that no real co-design occurred during the summer. Re-running the co-design may inconvenience the Council, but we believe is justified.

Alternatively, if this is seen as unfeasible, we request that any phase 3 consultation period be extended from the standard four weeks to 12 weeks. This would signal a commitment to genuinely engage with the community.

What we do not believe is justified is for the Committee to take no action. This would mean ignoring a clear and reasonable call for proper engagement.

# Finally, while other delegations tonight will discuss the merits of an LTN, our focus is on the engagement process itself, which is the matter before the Committee.

We are, of course, available to answer any questions. A copy of this submission and important supporting evidence has been emailed to the Committee Services team. Thank you.

## Notes

- 1. DPHN Joint Action website, *Petitioning Camden*. Available at: <u>https://dphnjointaction.com/petitioning-camden/</u> [Accessed 10 Nov. 2024].
- DPHN Joint Action website, *Highgate Society Objections to Proposals August 2024*, pages 15-16. Available at: <u>https://dphnjointaction.com/wpcontent/uploads/2024/08/HS-DPHN-traffic-co-design-response.pdf</u> [Accessed 10 Nov. 2024].
- 3. Other available measures include green school runs, improved bus services, trafficcalming measures, and road tax. See further *Background Information - What Other Traffic Management Measures are Available to the Council?* below.
- Highgate Society website, Dartmouth Park Healthy Neighbourhood Public Meeting, September 2024 (including audio recording of statements, Cllr Aref-Adib's comments at 1.13.12 and Cllr Wright's comments at 1.15.54): Available at: <u>https://highgatesociety.com/dartmouth-park-healthy-neighbourhood-public-meeting/</u> [Accessed 10 Nov. 2024].
- 5. Sunlight Foundation, What is Co-design. Available at: https://communities.sunlightfoundation.com/action/codesign/#:~:text=in%20your%20 context.-.What%20is%20co%2Ddesign?,creation%20and%20open%20design%20processes.& text=Key%20components%20of%20a%20co,Developing%20solutions%20based%20 on%20feedback [Accessed 10 Nov. 2024].
- 6. Dartmouth Park Neighbourhood Forum, 2021. Dartmouth Park Design Charter. Available at: https://dpnf.org.uk/wp-content/uploads/2021/05/20210329-Dartmouth-Park-report-FINAL-lowres.pdf [Accessed 10 Nov. 2024]. The Fairness design principle states: FAIRNESS: Ensure safe accessibility to streets for all, especially those less able and those with children, buggies, or mobility aids. Ensure a fairness of approach that does not negatively impact people in the neighbourhood or just outside. Ensure fairness of access to parking/ storage for all modes.
- 7. Transport Secretary Louise Haigh, referring to LTNs, stated: "It all has to be done with communities, absolutely, and the worst thing you can do is put the wrong schemes in because then it erodes that support and they can be unsafe in some circumstances." The Independent, 21 August 2024. *Haigh: Low-traffic neighbourhoods are decisions for communities not Whitehall.* Available at: <u>https://www.independent.co.uk/news/uk/louise-haigh-transport-secretary-secretary-of-state-whitehall-government-b2599848.html</u> [Accessed 10 Nov. 2024].
- 8. DPHN Joint Action website, *Highgate Society Letter to Anna Wright*, 24 October 2024. Available at: <u>https://dphnjointaction.com/wp-content/uploads/2024/11/Anna-Wright-PDF.pdf</u> [Accessed 10 Nov. 2024].

Note: All references to residents include local businesses.

#### **Further Background Information**

What Role is the Highgate Society Playing in the Traffic Proposals? The Highgate Society has been actively involved in representing community interests. The Society's Traffic and Travel group has liaised with residents, gathering feedback, and advocating for a balanced, evidence-based approach to traffic and environmental management. The Society's position is rooted in a commitment to sustainability and a reduction in pollution, but it recognises that poorly designed schemes can have unintended, detrimental impacts. The Society's goal is to ensure that any scheme implemented is well-considered, data-driven, and enjoys broad community support.

What Other Traffic Management Measures are Available to the Council? Local councils have many tools beyond LTNs for reducing car use. Green school runs, improved bus services, and traffic-calming measures offer viable alternatives that can achieve similar benefits with less unintended side effects. Changes in road tax policy are another tool. With more electric cars, the public purse is under strain, with less tax from fuel sales and car licences. One proposed solution is road-user charging, where drivers pay per mile based on congestion, time of day, and vehicle type. Whatever your views on that approach, it underscores the point that LTNs are not the only solution for an area. These alternatives can often achieve similar environmental benefits without the adverse side effects of increased boundary traffic and pollution displacement that LTNs can create.

WhyDoesCommunityEngagementMatter?Community engagement is crucial for creating solutions that are viable and accepted by thoseaffected. Meaningful engagement ensures that residents' specific insights and concerns shapeproposals, resulting in policies that are more successful and less divisive. In the case of thisLTN proposal, inadequate engagement has led to community distrust, with many residentsfeeling sidelined in a process that affects their daily lives. Effective engagement should gobeyond providing information; it should involve co-design, where residents have a genuine rolein developing solutions from the ground up. This approach is essential to fostering communitybuy-in and ensuring that policies address real needs.

Traffic Why Are Many Residents **Opposed** these **Proposals?** to While almost everyone supports the goals of reducing traffic and improving air quality, there is substantial opposition to the current proposals. Concerns stem from a perception that the scheme has been poorly planned and lacks sufficient data to predict its impact accurately. Specifically, residents worry about increased congestion and pollution on boundary roads, which could disproportionately affect lower-income areas already struggling with high pollution levels. Additionally, many feel that Camden Council's engagement process was insufficient, with a rushed six-week co-design phase held during the holiday period, limiting residents' ability to participate. This perceived lack of transparency has led to a strong sense of disenfranchisement among residents.

How Could the Proposed LTN Affect Surrounding Areas? One of the main concerns with LTNs, including this proposal, is the potential for traffic displacement. While traffic within the LTN area might decrease, vehicles are likely to reroute to boundary roads, causing increased congestion and pollution in those areas. Junction Road, Fortess Road, Highgate Road, Highgate West Hill, Highgate High Street, and Highgate Hill are already heavily congested, and residents fear that the proposed LTN would exacerbate these issues. In the Highbury LTN in Islington, traffic on Blackstock Road increased by 58%. This is not typical but highlights the need for good research for each area. The Highgate Society believes that these risks need to be carefully evaluated and mitigated, with data-driven planning and real engagement to address local concerns.

Been What Co-Design, Properly Implemented Here? Is and Has It Co-design is a participatory approach in which community members are actively involved in developing solutions. It requires a high level of collaboration, and transparency. In the case of this LTN, the Council's six-week engagement phase fell short of these standards. Instead of involving residents in shaping the proposal, the process appeared rushed, residents felt talked down to, leaving many feeling that decisions had already been made. True co-design would have entailed a more thorough, inclusive approach, where residents' ideas and concerns were integrated into the proposal from the start of the phase.

#### What Data Concerns Does the Highgate Society Have Regarding these Traffic Proposals?

The Highgate Society has raised multiple concerns about the data underpinning the proposals. Effective traffic management requires robust data but the Council's documents contain no evidence of the factors that influence traffic levels. That is everything from hills, to population demographics, availability of alternative transport methods, actual surveys of routes and reasons for travel, current traffic flows, congestion points, and pollution levels. This information is available and it is reasonable to expect the Council to obtain it for this scheme. It would support projections on how the scheme will affect both the LTN and surrounding boundary areas. Without this information, the proposal is, in the Society's view, based more on assumptions than evidence. This lack of data also prevents residents from fully understanding how the LTN will impact them, further fuelling opposition.

## How Has the Council's Use of the Experimental Traffic Order (ETO) Affected the Proposal's Credibility?

The traffic proposals rely on an Experimental Traffic Order (ETO), which allows the Council to implement changes temporarily. While ETOs can provide flexibility, the Highgate Society argues that their use in this instance undermines the credibility of the process. Implementing a scheme as an "experiment" suggests it has not been fully thought through and risks turning residents into subjects of a large-scale traffic experiment. The Society believes that major changes to traffic flow and community infrastructure should be based on rigorous planning and community consensus, not on experimental measures.

HowWilltheProposedLTNImpactLocalBusinesses?Many businesses rely on accessible roads for customer access, services, and deliveries. The

proposals could have unintended economic consequences if traffic restrictions make it difficult for businesses to reach customers (and *vica versa*), potentially resulting in revenue loss and, in extreme cases, business closures. The Society emphasises that Camden Council has a responsibility to consider these economic impacts carefully. Failure to do so risks damaging the local economy, and reducing the availability of services for residents, leading to residents travelling further to access necessary services.

#### Does the Highgate Society Support Traffic Management and Pollution Reduction Goals?

The Highgate Society is fully committed to reducing pollution, enhancing sustainability, and improving community health. The Society's Sustainable Living group actively promotes environmental initiatives, such as electric vehicles, heat pumps, and energy efficiency in buildings. However, the Society believes that traffic management measures must be rooted in clear objectives, robust data, and a transparent, inclusive design process. The Society supports the goals of cleaner air and reduced traffic but insists these goals should be pursued through well-planned, evidence-based policies that are likely to achieve long-term success.

What Steps is the Highgate Society Taking to Improve the Engagement Process? In response to widespread concerns over the Council's engagement approach, the Highgate Society has taken proactive steps to ensure community views are heard. These include organising a public meeting, commissioning an independent transport consultant to assess the proposals, and launching a publicity campaign to increase awareness. Through these efforts, the Society seeks to ensure that decisions affecting traffic and environmental policy in Highgate are made transparently and reflect the community's needs.

What about the Petition? The Society gathered almost 3,000 petition signatures (2,915 people as of 19 August, and 2,308 as of 16 August when this was presented to Camden Council). We note the Council's response that 595 of 2,308 (just over 25%) of the signatures are Camden addresses. We accept that some signatures are from outside the area, and we do not of course have any control over who signs an online petition. However, many more than the 595 signatories are from addresses in the area, both Islington addresses inside the LTN, and many more in the boundary areas (e.g. Haringey) who will be significantly affected by the proposals and should be treated in all respects as stakeholders.

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