

10A South Grove Highgate London N6 6BS

5th November 2023

Dartmouth Park Healthy Neighbourhood – Preliminary Consultation

The Highgate Society

The Society was founded in 1966 by local people who had successfully fought plans to route heavy traffic through the heart of Highgate demolishing much of the village. Issues relating to traffic are central to our purpose.

We have over 1,250 members. Nearly 85% of members are in Haringey and Camden, with Haringey forming the larger portion. 7% of members are in Islington and 4% in Barnet. Accordingly, our interests and activities cover the whole of Highgate, which reaches into four boroughs: Haringey, Camden, Islington and Barnet.

Observations about the consultation

Little information has been provided and residents can only guess what the intentions might be. The consultation will need to comply with the Supreme Court's guidance in *R* (on the application of Moseley (in substitution of Stirling Deceased)) 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 proposals."

The following comments are thus preliminary:

1. Area covered

- a. The 'Healthy Neighbourhood' plan is entitled 'Dartmouth Park'. However most of the LB Camden part of Highgate is included and the bulk of the area covered by the plan is not in Dartmouth Park. This is true particularly of the parts of Highgate Village which are included, and the encircling main roads of Highgate West Hill and Highgate Hill and High Street. The title of the project is misleading and will tend to exclude those who live or work within the area shown but do not identify as living in Dartmouth Park.
- b. The map excludes The Grove in Highgate, which might well be affected by the proposals. The map should be adjusted so that it is included.
- c. The map identifies Waterlow Park as Highgate Cemetery. This error needs to be corrected and both areas correctly shown.

d. The proposals may divert traffic from streets internal to the area onto the boundary roads. This possibility makes the effects on the boundary roads significant, so involving the businesses and residents on both sides of those roads in the consultations is important.

2. 'Healthy Neighbourhood'

- a. There are many elements to a healthy neighbourhood, of which healthy streets and travel are just two. Healthy housing and convenient health provision are equally if not more relevant to the health of neighbourhoods but are not included in this consultation. This is a consultation about healthy streets and should be so named to avoid misunderstandings.
- b. Accordingly the consultation title 'Dartmouth Park Healthy Neighbourhood' should be replaced by the title 'Dartmouth Park and Highgate Healthy Streets'.

3. Areas for improvement

- a. The four areas for improvement, simplified, are
 - i. New plants, trees and seating.
 - ii. Safer and cleaner streets.
 - iii. Reduce traffic.
 - iv. Support local businesses.

These are all worthy objectives but, as will no doubt have been recognised by those who drafted them, the first three can be inconsistent with the fourth objective. Objective iii can be complex involving reductions in traffic in some roads, but increases elsewhere.

- b. The areas for improvement also omit a significant area, which is convenient travel. This should be added as a fifth objective. The first three objectives could be met by closing roads, but the inconvenience caused to travel will usually make that unacceptable. Not only do road closures and LTNs cause inconvenience for people in those streets, but they cause an increase in traffic in surrounding streets and they lengthen journey times and thus emissions. Bland statements such as that the traffic will evaporate are not supported by any evidence for areas like this one.
- c. Swains Lane, Highgate West Hill and Highgate High Street are narrow and frequently congested streets now. Highgate Hill is the site of Channing School on both sides of the road and additional pollution could affect hundreds of children. Very careful consideration is needed before any more traffic is diverted onto them.
- d. The extension of journey times caused by road closures and one-way systems can have significant effects. The closure, even in one direction, of Chetwynd Road would add several minutes to a journey to the Royal Free Hospital from the Crouch End Broadway direction, for example (as Google maps shows). The congestion in Chetwynd Road is mainly caused by cars being allowed to park on both sides in the eastern stretch of that road, which inconveniences both vehicles and pedestrians, as is well known to those who live on and use the road. No doubt it is convenient for residents to be able to park close to home, though their cars often suffer damage from passing traffic. The obvious solution to the current arrangement would be to allow parking on one side of the road only on that stretch. Alternatively Dartmouth Park Road could be reopened to through traffic and that road and Chetwynd Road both made one-way. Restricting traffic and

closing routes may be the current fashion but will not always be the optimal solution.

4. Strategy

We have previously – last year - provided a contribution to Camden's Transport Strategy in the form of our own transport strategy. We ask you to consider that strategy in developing your proposals. A copy is below.

- 5. We look forward to seeing the consultation proposals next year and will consider them in the context of several points, including:
- Is there a simple and cheap solution that could be tried and reversed if it is unsuccessful?
- Are there identified and serious issues for the health of residents in the area or on particular roads?
- Will the proposals materially improve the health of residents generally, and if so how?
- Are there safety issues particularly for pedestrians and cyclists that need to and are being addressed?
- Have the needs of those with reduced mobility been considered?
- Are the proposals based on traffic counts and air quality monitoring on the roads particularly boundary roads impacted?
- Will there be an impact on public transport?
- How and where to will traffic be diverted?
- What will be the cost of the proposals? How will they be funded given the context of very tight local authority budgets?
- Has the economic impact of longer journey times necessitated by any proposals been considered?
- Are the expected benefits clearly articulated?
- How will achievement of those expected benefits be monitored and measured?

A copy of the Society's Transport Strategy is appended below.

William Britain Chair



Highgate Society Transport Strategy

(A contribution to Camden's 2022 Transport Strategy review) Principles

- Highgate is a cross-borough community with the boundary between Camden and Haringey running along Highgate High Street and Hampstead Lane, and between Camden and Islington along Dartmouth Park Hill. All traffic strategies and policies need to take this fact into account, in particular by the transport policies for Highgate of each Borough being made in consultation with the other Boroughs.
- 2. Highgate is hilly and has many narrow streets. This often results in competition for road space and makes Highgate comparatively unattractive for casual cyclists.
- 3. In general we agree with the priorities of road users set out in the existing Camden Transport Strategy, save that public transport is a higher priority than cycling, being used by so many more people: first pedestrians, then public transport, then cyclists, then goods (including tradespeople), then cars, then motorcyclists. However, the specifics and relative priorities for different roads and areas will vary.
- 4. All strategies should take disability into account, including the effects of age on the ability to use each means of transport.
- 5. The Transport Strategy should have links to separate walking, cycling, goods and car and motorcycle strategies.¹ If these separate strategies are not coordinated the effect can be congestion, and as the minimisation of congestion is a benefit to all it should be a principle of the Strategy.
- 6. We agree that a principal priority is healthy streets, and note that the GLA Healthy Streets strategy and the London Mayor's Air Quality Strategy do not refer to the principal source of unhealthy air for travellers in London, the London Underground.²
- 7. While not disagreeing with the Mayor's Transport Strategy for London, we recognise that it is too high level to be readily applicable to decisions for Highgate.³

¹ Only the first three of these exist at present.

² 'PM_{2.5} on the London Underground' Smith and others Environment International 134 (2020) 105188

³ The Mayor's 6 goals are: Support economic development and population growth; Enhance the quality of life for all Londoners; Improve the safety and security of all Londoners; Improve transport opportunities for all Londoners; Reduce transport's contribution to climate change and improve its resilience; Support the legacy of

- 8. Every transport initiative must have clearly stated and measurable objectives.
- 9. Every transport initiative which involves expenditure should include a cost/benefit analysis including considering externalities, such as impact on congestion, air pollution, travelling times, etc. The analysis should include those costs and benefits which are estimated will accrue according to the numbers and each type of user and other residents as a result of a proposed travel or road initiative.
- 10. Integral to the success of the Strategy will be the involvement of Transport for London and the Mayor's office. Involvement with central Government will also be necessary.

Strategy

- A. Highgate village and Swains Lane should be recognised as shopping centres requiring integrated transport planning.⁴
- B. As shown in the GLA London-wide survey of possible Low Traffic Neighbourhoods (LTNs), Highgate is not suited to LTNs.⁵
- C. Air quality monitoring and improvement, in which Camden is a leader, is supported. Since the boundary between Camden and Haringey runs down the middle of Highgate High Street, and pollution from one side will equally affect the other side, this is an area where cross-borough coordination is essential. We also support monitoring and improvement of air quality on the Underground; as the levels of particulate pollution on the Northern Line are many times (typically 18 times⁶) the levels of pollution at street level and whole journey information is needed by travellers.
- D. The monitoring of small particulate air pollution should be made part of the Strategy.⁷
- E. The continued conversion of council and contractor vehicles to electric, phasing out of diesel buses and roll-out of electric vehicle charging points is endorsed.
- F. The schools safety programme should be extended to all schools including non-local authority schools.
- G. There should be maintenance, review and where appropriate updating of aspects of the public realm such as road and pavement surfaces, traffic and parking restrictions, signage and street lighting.

the London 2012 Olympic and Paralympic Games. https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf

⁴ Highgate is not recognised as a shopping centre in either Camden's 2019 or Haringey's 2018 Transport Strategy

⁵ https://content.tfl.gov.uk/lsp-app-six-a-supplementary-guidance-ltns-v1.pdf at Fig 1. Highgate 'neighbourhoods' are too large.

⁶ 'Spatial variability of fine particulate matter pollution (PM2.5) on the London Underground network' Saunders and others *Urban Climate Volume 30*, December 2019, 100535

⁷ PM_{2.5} particulates were omitted from Camden's existing Transport Strategy, but have seriously harmful health effects.

- H. Enforcement of speed limits and traffic rules must not be neglected.
- I. A plan for car-free days in Highgate Village should be made the subject of consultation.
- J. The Highgate Society and the Highgate Neighbourhood Forum should be consulted on all proposed transport developments in Highgate.