

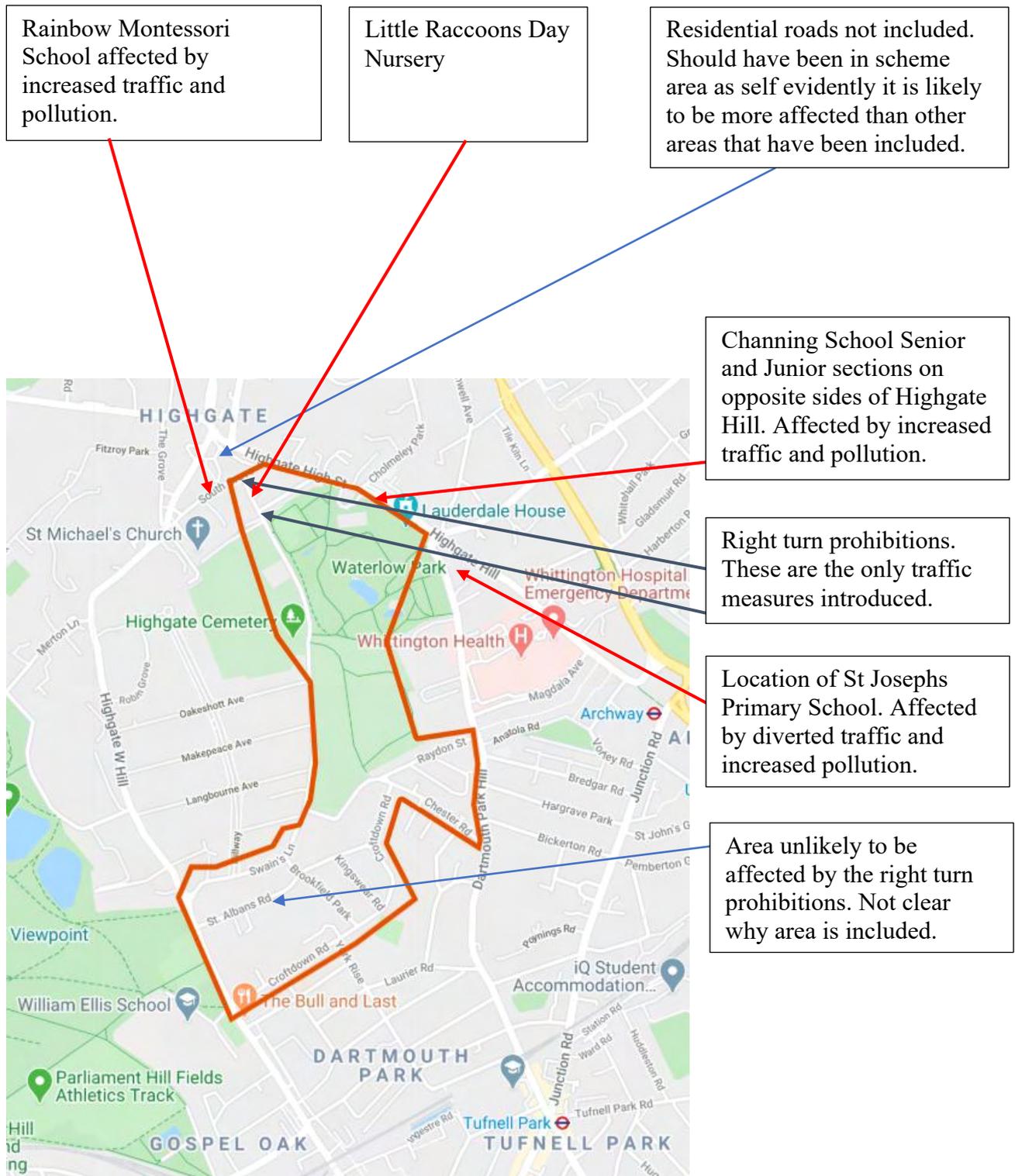
Highgate Society
Response to the consultation on the Swains Lane right turn prohibitions
4 September 2021

The Highgate Society opposes the continuation of the prohibition of the right turns from Swains Lane into South Grove and Bisham Gardens.

A summary of our concerns is shown in the table below

Aspect	Concerns
Definition of the scheme consultation area in Highgate Village	The definition of the boundary of the area is fatally flawed. The areas included in the boundary north of Chester Road, other than Bisham Gardens are low residential density and the areas around the boundary and adjacent in Highgate Village have a higher residential density. Diverting traffic out of the scheme area therefore <u>increases</u> the number of residences affected by traffic and pollution.
Pollution in the vicinity of schools	Additional diverted traffic (according to Camden's own statistics) will cause additional pollution for schools and a nursery. The scheme report does not even mention the existence of these schools. The scheme itself therefore inevitably does not address existing pollution for students and children at these schools or the impact of the diversion of traffic due to the right turn prohibitions.
Rat run traffic	As identified in the traffic monitoring report, there has been an increase in rat run traffic in Pond Square, South Grove and other Highgate village roads. Traffic in The Grove has not been measured but is also likely to be suffering increased rat run traffic. Elsewhere, traffic has increased on Highgate Hill and High Street which has more residential accommodation than the restricted section of Swains Lane, as well as schools.
Pedestrian safety	The right turn prohibitions have made no material improvement to pedestrian safety and the problems of pavement width which are especially acute in the section of Swains Lane between Bisham Gardens and South Grove. The section is heavily used by parents with small children due to proximity of a day nursery and for access to Waterlow Park.
Speeding traffic in Swains Lane	The right turn prohibitions do not address the problems of speeding traffic because no traffic calming measures have been introduced.
Cycling	There is no evidence that the scheme has given rise to an increase in local cycling to local facilities. Speeding – the specific complaint of cyclists – has not been reduced.
Monitoring report	The monitoring report incorrectly in the summary that traffic flows on boundary roads are lower than or comparable to the scheme was introduced. As the report itself goes on to document, there has been an increase of 17% or 2,222 vehicles a day on Highgate Hill. The report uses complex adjustments that are not explained to derive post pandemic expectations of traffic. As we are now close to the returns to normal patterns of life, new measurements of the actual situation should be undertaken.

Map of Scheme area and some key points



Map sourced from

<https://democracy.camden.gov.uk/documents/s89567/COVID%2019%20response%20Low%20Traffic%20Neighbourhood.pdf>

Objectives

We support the objectives set out by Camden, which are *“to make it easier and safer for people to walk and cycle locally, shop on their local high street, reach their local green spaces, schools and NHS sites, all while maintaining physical distancing.”*¹

The document also states that *“We want to see air quality improvements continue so we are encouraging our communities to make healthy, green choices to walk and cycle more.”*

However, these objectives are too limited. A critical objective of traffic management should be to reduce pollution particularly near schools, residential areas and areas of high pedestrian density, while recognising the complex and diverse needs of residents and highway users which includes adults with children, the disabled and elderly.

On Swains Lane itself the consultation states that *“There have also been comments on rat running suggesting that traffic use Swain's Lane as a cut through to avoid Highgate West Hill and Dartmouth Park Hill, as well as issues of speeding traffic and cyclists feeling unsafe. To respond to these challenges we are preventing through traffic in order to prevent this rat running and reduce the ability of cars to speed in the area.”*²

Definition of the scheme consultation area in Highgate Village

The consultation area does not include the core areas of Highgate Village within Camden north of the top end of Swains Lane. These are the Highgate Village section of West Hill, Pond Square, South Grove west of Swains Lane at its junction and The Grove. The small remaining areas of Camden in Highgate village should have been included within the boundary. It is unclear why this was not done.

However the area south of Swains Lane and Chester Road has been included, even though these areas could not realistically be affected by the right turn prohibitions at the top of Swains Lane. This is also hard to understand.

Swains Lane north of Chester Road has very little residential accommodation. Along the length from Chester Road to South Grove, the great majority of the frontage is Highgate cemetery and Waterlow Park.

This flawed assumption that this section of Swains Lane is residential affects the whole plan. By drawing the boundaries to the area within which restrictions are introduced, it becomes inevitable that traffic will be diverted onto the boundary roads and immediately adjacent areas at the north of the defined scheme area. The plan is exactly that: to divert traffic out of the area that has been defined by its boundaries.

The failure is in the original drawing of the boundaries which is based on faulty assumptions about where traffic causes problems.

As a result of this fundamental flaw traffic has been diverted from the largely non-residential section of Swains Lane to the detriment of the core Highgate village area which in Pond Square, South Grove and West Hill is more residential.

More broadly the consultation gives no consideration to the impact on adjoining areas of Haringey.

¹ See <https://www.camden.gov.uk/making-travel-safer-in-camden>

² See <https://www.camden.gov.uk/making-travel-safer-in-camden#bfev>

Please see the map above for the area covered by the scheme.

The definition of the boundary of the area is fatally flawed. The areas included in the boundary north of Chester Road, other than Bisham Gardens are low residential density and the areas around the boundary and adjacent in Highgate Village have a higher residential density. Diverting traffic out of the scheme area therefore increases the number of residences affected by traffic and pollution.

Pollution in the vicinity of schools

Swains Lane is northbound between the cemetery entrance and Bisham Gardens and so the traffic under consideration is primarily northbound. The routes that receive diverted traffic are more residential than Swains Lane. They also contain three schools.

Camden's own monitoring data shows an increase of 2,222 vehicles a day on Highgate Hill (HH).³ Diverted traffic arriving at the monitoring point just north of the junction with Dartmouth Park Hill (DPH) will have arrived at that point having either travelled via DPH or the southern part of HH. There is then no exit from HH until Cholmeley Park, which would be an alternative route to the A1 and Archway Road. Alternatively, the traffic continues northbound through Highgate High Street (HHS).

Pollution was not measured on HH and it is inevitable that the additional vehicles will have caused increased pollution. The schools in the area are directly impacted by diverted traffic. Importantly they are already on high traffic routes. St Joseph's primary is situated between HH and DPH, and the two Channing School sites are both on HH. Channing junior school in particular is positioned close to the road. In Chester Road where Highgate Primary is located the traffic monitoring shows a small 5% reduction in traffic, but again no monitoring of pollution has been undertaken.

Little Raccoons Day Nursery is in Swains Lane in the dangerous two-way section.

Rainbow Montessori School is in the section of South Grove which has seen an increase in traffic, as explained in the section below.

It is incomprehensible that the effect on schools has not been considered in the pollution monitoring, given Camden's commitment to improving air quality – a commitment supported by the Highgate Society.

Additional diverted traffic (according to Camden's own statistics) will cause additional pollution for schools and a nursery. The scheme report does not even mention the existence of these schools. The scheme itself therefore inevitably does not address existing pollution for students and children at these schools or the impact of the diversion of traffic due to the right turn prohibitions.

Rat run traffic

One objective of the right turn prohibitions is to reduce rat run traffic within the scheme area, and there is a reduction of 17% in Swains Lane traffic, which is deemed by the consultation to be rat run traffic. However, by excluding the residential and more densely developed areas of Highgate

³ See Monitoring Report at https://consultations.wearecamden.org/supporting-communities/swains-lane-safe-and-healthy-street/supporting_documents/Swains%20Lane%20monitoring%20report.pdf

village from those that are within the scheme area, the impact on rat run traffic on those roads is largely excluded from consideration.

The traffic monitoring recognises that there has been a 56% increase in “rat run” traffic in Pond Square between South Grove and West Hill at the exit near the Gatehouse, as measured by the number of vehicles turning right. This section of road alone, probably contains a greater population than the section of Swains Lane north of Chester Road.

There is also additional rat run traffic in South Grove west of its junction with Swains Lane.⁴

Traffic on the section of West Hill between the junction with South Grove and the Gatehouse has not been measured and nor has traffic on the Grove been measured. However, it seems likely to have increased on both roads due to traffic that emerges from Swains Lane turning left and then travelling to by St Michaels Church before then taking one of those two options to continue northbound.

When is a cut through not a cut-through? Camden’s statistics show a reduction of 313 vehicles a day in Swains Lane but an **increase** of over 2,000 a day on Highgate Hill following introduction of the right turn bans. Shoppers and residents on Highgate Hill (and the High Street), which are far more numerous than those on Swains Lane, and already suffer from worse pollution have had their lives made worse due to diverted traffic.

As identified in the traffic monitoring report, there has been an increase in rat run traffic in Pond Square, South Grove and other Highgate village roads. Traffic in The Grove has not been measured but is also likely to be suffering increased rat run traffic.

Elsewhere, traffic has increased on Highgate Hill and High Street which has more residential accommodation than the restricted section of Swains Lane, as well as schools.

Pedestrian safety

The proposal information sheet correctly identifies narrow pavements in Swains Lane as a problem. These mean that pedestrians need to step into the road when passing each other.

The problem is particularly acute in the section between Bisham Gardens and South Grove. In this section the traffic is two way and in order to pass it needs to mount the pavement.

The Little Raccoons Day Nursery is also located in this section of Swains Lane. Parents with small children need to negotiate the narrow pavement with buggies or children on foot. The section is also used by pedestrians accessing Waterlow Park.

In spite of setting pedestrian safety as an objective, the changes have made no material impact to pedestrian safety in the most unsafe section.

⁴ Using the adjusted data in the monitoring report: Reduction of traffic in Swains Lane is 313. Reduction of traffic in South Grove east of its junction with Swains Lane is 105. As all traffic emerging from Swains Lane had to turn left or right before the scheme introduction there has been an increase of traffic on the section of South Grove west of the junction with Swains Lane of 208. All figures are vehicles per day. It is characteristic of the poor quality of the report that the reduction reported for South Grove is described as being measured “between Pond Square and Swains Lane”. As anyone who was familiar with the roads would know, Pond Square as a road goes all the way round and encloses the square. The description of the point where measurement was undertaken could therefore mean either east or west of the top of Swains Lane. However, in practice the measurement must have been taken on the west side, as a reduction on the west side in the direction where traffic is forced to turn could not have occurred.



Pedestrians in Swains Lane north of Bisham Gardens continue to be forced into the road.



Traffic and pedestrians alongside Little Raccoons Day Nursery

The right turn prohibitions have made no material improvement to pedestrian safety and the problems of pavement width which are especially acute in the section of Swains Lane between Bisham Gardens and South Grove. The section is heavily used by parents with small children due to proximity of a day nursery and for access to Waterlow Park.⁵

⁵ A small and simple improvement in the Waterlow Park section would be to give more frequent attention to preventing overhanging of branches which as at 3 September 2021 in two places force a person of average height to step into the road.

Speeding traffic in Swains Lane

The proposal information sheet correctly identifies speeding traffic in Swains Lane as a problem for both pedestrians and cyclists. Based on the traffic measurement statistics there has been a reduction of traffic by about 100 vehicles a day or 17%. No measurements were taken of the number of vehicles speeding.

No changes have been made to the road humps in Swains Lane and no other traffic calming measures have been brought in. It seems unlikely that the measures will have reduced the amount of speeding traffic other than perhaps reducing the number by a small amount.

The right turn prohibitions do not address the problems of speeding traffic because no traffic calming measures have been introduced.

Cycling

One of the objectives is to encourage people to “*cycle locally, shop on their local high street, reach their local green spaces, schools and NHS sites...*”. An important aspect of the objectives is the word “*locally*” because Swains Lane is noted by The Independent as the number one route in London for keen cyclists to challenge their hill climbing skills.⁶ Clearly facilitating arrangements for extreme fitness hill climbing (which might for health reasons be desirable) should not be confused with cycling to reach local destinations such as Highgate High Street, Waterlow Park or schools.

It seems reasonable to expect that the success of the right turn prohibitions on local cycling could be measured by measuring the number of cyclists using Swains Lane, and for the purposes of the stated objectives excluding those who pass the measuring point more than once in every 15 minutes. Exercise cyclists tend to do circuits, coming up Swains Lane and descending via West Hill. These measurements have not been done.

Data on Lime cycle hire is presented as a surrogate. In the monitoring data, we are told that Lime bike hire journeys that start or finish in the whole Swains Lane low traffic area have increased significantly but the comments don't mention the topography. For many cyclists Swains Lane is a significant challenge. Even on a Lime electric bike it involves getting off the saddle at the steepest parts.

There is a big difference between bike hire journeys that

- a) start and finish at the bottom of the hill;
- b) Start and finish at the top of the hill; and
- c) Those ***within*** the scheme area on Swains Lane.

It is only those in (c) that could be affected by the right turns.

The Lime data covers all Lime journeys that start or finish at any place within the scheme area. They give no insight into whether local cycling within the area has increased. Very likely many of the journeys that start or finish in the area, start or finish in the area south of Swains Lane at its southerly end.

The statistics on Lime cycle usage show a significant increase in May 2020. Lime acquired Jump in May 2020, but the impact of the acquisition has not been considered.

⁶ See <https://www.independent.co.uk/life-style/health-and-families/london-s-5-best-biking-hill-climb-hotspots-a7633111.html>

In any case, how do we know if cycle hire usage is representative of all kinds of cycle usage?

There is no evidence that the scheme has given rise to an increase in local cycling to local facilities. Speeding – the specific complaint of cyclists – has not been reduced.

Monitoring report

The report summary states that “*After-scheme’ traffic flows on boundary roads are also lower than or comparable to ‘Before-scheme.’*”⁷ This statement is incorrect. As the report itself goes on to document on page 5, there has been an increase of 17% or 2,222 vehicles a day on Highgate Hill.

This response has highlighted several concerns about the statistics.

- a) The after implementation statistics were measured in 2020 – this was when the pandemic restrictions were still in place.
- b) The data has then “*been normalised to a 2019 (pre-COVID) baseline and subsequently adjusted for seasonality to ensure ‘Before’ and ‘After’ scheme counts are comparable. An adjustment factor for motorised vehicles has been derived from continuous count data 2019-2020 for Inner-London.*”⁸

It is impossible to understand how these adjustments are made.

As we are now very close to the date when schools will restart, workers will go back to offices and general normal post pandemic life is expected to restart, it would be far better to undertake new measurements now of the current actual situation and not to rely on adjustments that inevitably will be subject to error.

The monitoring report incorrectly in the summary that traffic flows on boundary roads are lower than or comparable to the scheme was introduced. As the report itself goes on to document, there has been an increase of 17% or 2,222 vehicles a day on Highgate Hill.

The report uses complex adjustments that are not explained to derive post pandemic expectations of traffic. As we are now close to the returns to normal patterns of life, new measurements of the actual situation should be undertaken.

⁷ See Monitoring Report page 2 https://consultations.wearecamden.org/supporting-communities/swains-lane-safe-and-healthy-street/supporting_documents/Swains%20Lane%20monitoring%20report.pdf

⁸ See Monitoring Report page 3 https://consultations.wearecamden.org/supporting-communities/swains-lane-safe-and-healthy-street/supporting_documents/Swains%20Lane%20monitoring%20report.pdf