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# Haringey Draft Walking and Cycling Action Plan

## **Submissions of the Highgate Society**

The Highgate Society is a committed supporter of active travel, and an advocate for reductions in pollution and emissions which contribute to climate change. It follows that we support walking, cycling and lower-polluting vehicles in place of vehicles powered by fossil fuels. More specifically we regard it as essential that road space is managed to encourage the healthiest and least polluting forms of travel including surface public transport which serves so much of the population. It should also be recognised that roads need to continue to provide for large vehicles for refuse collection, services and deliveries, as well as emergency vehicles.

The Society's **priorities** are therefore:

- To make walking more attractive by making safe crossing points, limiting traffic speeds, having pavements wide enough so that the road does not need to be used by pedestrians, having cleaner air and other initiatives detailed below;
- To make cycling safe, while recognising that the steep hills of the Highgate area will mean it will continue to be for many people an area they would not choose for cycling;
- To carefully balance the needs of residents and businesses to provide facilities for vehicles, including visiting vehicles, buses and deliveries, against the safe use of those streets for pedestrians and cyclists;
- To manage interchanges between walking and public transport (underground and buses) so as to ensure the maximum convenience in locations and waiting times;

- To minimise congestion on through routes with its consequences for harmful pollution, wasteful delays and diversion through residential streets.

Comments are made in accordance with the 5 sections of the Draft Plan on Walking, Cycling, Low Traffic Neighbourhoods, the Active School Run and Active Travel and Development.

The Highgate Society takes the view that the weaknesses of parts of the Draft Plan, as set out below, are so fundamental that a further draft is required which addresses those weaknesses, which draft should then be made the subject of further consultation.

## Walking

The Plan recognises that “Walking is the mode of travel that is most important to the aims of this action plan” [4.1]. We agree. As the Plan sets out, almost everyone is a pedestrian while only 3% of journeys are by cycle. It would be helpful to make a distinction between different reasons for walking in order to inform the plan: walking to shops, to work, for leisure, to access public transport. Each of these require different encouragements to do more.

The Plan uses casualties per kilometre as its measure of danger on roads [6.34]. This is not the appropriate measure. While there may be more accidents on a busy stretch of road, because there are so many more people, per person they may be safer than a less trafficked road. So one in 1,000 road users being injured on a quiet road make it more dangerous than a busy road where one in 10,000 is injured, though because there are many more people using the busier road there are more accidents there. Accidents per kilometre don't really tell you what the level of danger is. There are always likely to be more accidents on busier roads, other things being equal, as there are more road users: more lorries, cars, pedestrians and cycles. A quiet residential street may be dangerous for children but there may have been only two or three accidents in the street which would mean that it would not feature as dangerous by a casualties per kilometre measure. A heavily trafficked road on the other hand may be much safer for the average user but still feature as dangerous on this measure. The measure should be casualties per trip (or per thousand trips), which gives a true picture of the level of danger.

The Plan refers to ‘the Haringey cycling and walking network’ [9.13]. This is not a valid concept as much walking is done on pavements which are not accessible for cycling. Equally cycle lanes are not available for walkers. Routes through parks are different for pedestrians and cyclists. While there will be some crossing points, for example, in common, the cycling network and the walking network are two different things which require separate consideration in relation to (as in this instance) LTNs.

It is noted in the Draft Plan that ‘people walk more if they live in an area which has good public transport’ [13.63]. While recognising that the provision of good public transport is a matter primarily for TfL rather than individual London boroughs, there is much that Haringey can do to make pedestrian use of public transport more convenient, in consultation with TfL. Unfortunately, the Draft Plan does not consider such actions at all. TfL's policy is that: "Boroughs should work with TfL to discuss how proposals for LTNs may affect local bus routes including journey times, both along perimeter roads and any routes that go through a proposed neighbourhood. It is important that the needs of different bus

customers are considered in the design and implementation of LTNs."<sup>1</sup> The Plan should include an action to review the convenience of access to public transport, bus stops in particular, in relation to common walking routes and likely destinations.

It is observed in the Draft Plan that signage should be kept to a minimum as it tends to make the streetscape unattractive. The Plan should include an action to review signage generally, as there are a number of unnecessary signs which should be removed. Most of Highgate is a Conservation Area and the Society has long campaigned for decluttering of the streets. One example is 20mph speed limit signs, some of which could be removed, having been superseded by larger areas of 20mph limits. In relation to the painting of yellow lines on its roads, Haringey has repeatedly failed to follow its own guidelines which are clearly set down in its Conservation Area Appraisal. These are mostly small matters which would benefit from routine review to make improvements in the streetscape.

A disappointing part of the report is its failure to develop any actions in relation to air quality, which is proposed to be merely monitored. This affects walking and is dealt with under the Active School Run heading below.

## Cycling

Some 45% of the budget proposed in the Draft Plan is to improve provision for cycling (£11.9m). As cyclists currently only account for 3% of trips in the Borough this may be considered a disproportionate allocation of resources. It is noted that as currently drafted the bulk of the Plan considers cycling. The Draft Plan says that better provision will encourage more cycling journeys and the new cycle routes are to “fulfil future demand for cycling” [8.26]. The evidence cited in support of that statement comes from other countries and from city centres. There is no evidence provided in the Draft Plan to show that cycling is likely to increase in a suburban borough such as Haringey as a result of this expenditure. There must be considerable uncertainty whether there will in fact be a future demand greater than at present. In any event no attempt is made in the Draft Plan to identify what that future demand may be. As the sum is a considerable one some such evidence is appropriate before the expenditure is approved. A cost-benefit analysis should be done.

Generally, there is evidence that cycle lanes, particularly when they are under-used (like the one on the A1000 north of Highgate) cause delays to traffic and in particular to buses which cannot share these lanes. The competition for road space should be resolved having regard, among other factors, to journey times for bus passengers. The issue is not considered in the Draft Plan. In particular the effect on bus and other traffic journey times of the cycling proposals made in the Draft Plan is not considered, which is a surprising omission which we would ask to be rectified.

More specifically, Highgate is currently identified in Section 5 of the Action Plan mesh density analysis diagram as a “cycle network gap”. Measures to address this are recommended by the creation of four cycle corridors, two east-west and two roughly north-south.

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<sup>1</sup> <https://content.tfl.gov.uk/lsp-app-six-a-supplementary-guidance-ltns-v1.pdf>

These are dealt with individually below but there are a number of specific problems which could render the aspiration for Highgate difficult, if not impossible, to implement. These include:

- Notoriously poor connectivity in an east-west direction in terms of both public transport and number of roads. This was recognised in the Highgate Neighbourhood Plan and various suggestions for measures to improve this (Hopper Buses etc) show no sign of being implemented.
- Steep topography, particularly on each of the proposed main roads, which means that increased cycle use will probably be marginal.
- Demography of population – an older age profile so a smaller proportion of the population are likely to take up cycling.
- The High Street being split between Camden and Haringey. There is historically poor consultation between the neighbouring boroughs. This was the driving reason for the setting up of the Highgate Neighbourhood Forum.
- The presence of essential green spaces (Hampstead Heath, Highgate Golf Club, Highgate and Queen's Woods, Alexandra Park and the Parkland Walk) affects available road space and contributes to bottlenecks
- The presence of the major national artery of the A1 through the middle of the Haringey part of Highgate
- As an historic village, Highgate has many narrow roads which cannot be widened.

Some streets where cycle lanes are proposed are for shopping streets where the shops have no rear access and depend on deliveries and collections from the front. They depend on servicing bays in the road for those purposes. This use of road space would be likely to compete with cycle lanes, and requires protection, partly to permit the survival of marginally profitable businesses.

- **Highgate to Muswell Hill** – This route is Southwood Lane and Muswell Hill Road. It would appear that the Action Plan was prepared on the basis of a paper exercise without a visit to Southwood Lane. Southwood Lane is the main road linking Highgate Village to the Crouch End and Muswell Hill but is a narrow residential road throughout its length with a bottleneck where a listed building and a designated Site of Importance for Nature Conservation reduce the road to a width where only small vehicles can pass. There is very restricted pavement and simply no room for any dedicated cycle provision. Meanwhile Muswell Hill Road is also at capacity, mainly in the morning rush hour with traffic backing up from Archway Road almost to Muswell Hill. This is a vital bus link for Muswell Hill and the underground network and many depend on this route for their daily commute. Again, any reallocation of road space would lead to an exacerbation of what is already an unacceptable situation.

#### **Archway to East Finchley**

A dedicated cycle lane up Archway Road is proposed. As the Plan recognises, this is a TfL route.

As the A1, it is a main trunk route carrying traffic from central London to the North of England and is heavily congested, including with heavy goods vehicles such as contractors' lorries. Any reallocation of road space to cycle lanes will only increase this congestion. It is also lined with retail premises for much of its length. These were built in the 19<sup>th</sup> and early 20<sup>th</sup> century and unlike larger and newer developments rely on kerbside deliveries, which inevitably would interfere with any cycle lanes. These shops are important incubator units which already struggle. The junctions between Archway Road and two other proposed cycle routes (Muswell Hill Road and Shepherd's Hill) are heavily congested junctions causing tail backs for a considerable distance. This particularly impacts on buses as much of the road is too narrow for dedicated bus lanes. Any reduction in traffic flow to prioritise cyclists over buses and other transport would result in gridlock.

A Cycle Superhighway was previously planned for this route but quietly dropped.

### **Shepherd's Hill/Wolseley Road**

This is the only significant route connecting Highgate and Archway Road to Crouch End, terminating in a heavily congested junction with Shepherd's Hill. Traffic regularly tails back from Archway Road to the junction with Stanhope Road and similarly queues are common at the junction at the west end between Wolseley Road and Park Road. Any road reallocation to accommodate a cycle lane would exacerbate this. Although the pavements are a reasonable width, they are lined with mature trees which would prevent any reallocation of pavement for cycle tracks.

There is no public transport link between Crouch End and Highgate Underground or Highgate Village, other than the W5 which operates on part of the route. The assumption that people will take to their bikes to improve accessibility if a cycle route is provided ignores the topography of the area and the extreme gradient of the road, particularly at its east end.

### **North Hill – Hampstead Heath**

North Hill is already heavily trafficked and under TfL's current reorganisation of its bus schedules, will have an increase in the frequency of double decker buses.

It should be noted that a recent scheme for cycle priority at the foot of North Hill was dismantled after it resulted in tail backs from the Wellington roundabout to Highgate Village.

Generally, a more balanced approach is needed before this Draft Plan on cycling can be endorsed, which needs to consider which of these cycle routes are practicable taking account of the road space available and the competing demands upon it, as well as the cost. A cost benefit analysis should be undertaken in relation to specific schemes to assess the number of travellers who will benefit and to what extent. Such an analysis would take account of the numbers of different types of users and the benefit for each type in terms of time saving, reduced pollution, lives and serious injuries saved, and other measures.

## Low Traffic Neighbourhoods

The Draft Plan shows the whole of the residential area of Haringey as intended to be covered by Low Traffic Neighbourhoods (LTNs). It must be doubtful what level of serious consideration has gone in to this approach.

Inevitably traffic is displaced onto the peripheral or designated major roads and, as these are generally roads which are already relatively deprived, there is a real risk of creating privileged “gated” communities for the LTN’s whilst the peripheral roads, also densely residential, carry all the traffic. This became obvious on Highgate West Hill during LB Camden’s recent (abandoned) LTN experiment in Swain’s Lane in Highgate. It should be noted that residents within LTN’s whilst enjoying the privilege of living in a traffic free environment do also use the peripheral roads as also do service and tradesmen’s vehicles.

The plan proposes 3 LTN’s which will cover Highgate, namely, Highgate East, Highgate West and Crouch End West.

Highgate, as stated above has poor east-west permeability. The roads proposed to be enclosed within the LTN’s are already low trafficked and the forcing of all traffic onto a very limited number of routes will exacerbate an already unacceptable situation.

The impact of this on the peripheral roads and the divisive nature of LTNs is recognised in the Action Plan in section 9.20 but is dismissed under the theory of Vehicle Evaporation. Section 9.26 states: “Predictions of traffic problems caused by LTNs almost always fail to materialise and significant reductions in overall traffic levels across an area can happen as a result of people making different choices about their mode of travel and the journeys they make”.

Such generalizations are unhelpful. No evidence to support this statement is given and the evidence that congestion does increase has recently been shown by a recent INREX report that lists London as now being "*the most congested city in the world*" moving up from 16th place. A particular example is the east west route from Dalston Junction to Highbury and Islington. Traffic is regularly at a standstill along the length of this route and, as there are limited bus lanes on the route, bus journey times are considerably increased. LTNs will not cause traffic problems when the remaining through routes are of sufficient capacity to carry traffic for essential journeys but, when they are not, LTNs do cause congestion. Any proposed LTN should include an assessment of its probable effect on congestion with sound assumptions from relevant experience.

The only measure proposed for these three LTNs is ‘modal filters’ – making it illegal to drive across the areas. For example, there would be no route between Archway Road and Highgate High Street all the way between Archway Bridge and Southwood Lane nor any route linking Crouch End and Highgate except for Wood Lane. Shepherds Hill would be closed to through traffic. The northern part of Wood Lane is very narrow and vehicles larger than cars have difficulty passing. For this to be the one route between Highgate and Crouch End does not stand up to serious consideration and again one wonders whether the proposers of the Draft Plan have visited the roads concerned.

The amount of traffic which would have to use the remaining through routes and the resulting congestion does not bear thinking about. Much of the time traffic would be stationary if these proposals were implemented. The bland statement 'LTNs should lead to traffic reduction' [9.27] needs to be supported by credible evidence.

The Plan says: "less than half the population of Haringey owns a car." This means the majority of traffic on our residential roads is from vehicles which have not originated or are not destined for the borough". That doesn't follow at all. It fails to take into account that traffic on residential roads includes service vehicles of all sorts, delivery vehicles, tradesmen's vans and cars, not to mention visitors to residents and local bus services. Once they are taken into account the position is quite different - the majority of traffic on residential roads is for the benefit of residents. This is a very poorly considered plan for LTNs.

LTNs can be contentious even when carefully considered. Consideration of LTNs in this Draft Plan has not received the necessary care. If proposals for LTNs are to be included in this Plan then considerably more detailed work will need to be given to the subject first.

The Draft Plan observes 'We fully support Car-free Days' 11.66 – 11.67". Car-free days in Highgate are indeed an idea worth considering. By that we do not just mean encouraging people not to use their cars on one day a year, but closing streets to traffic. The Draft Plan says that has been considered for Wood Green shopping centre. The Plan should include an action to take the idea forward and implement car-free days at other places in the Borough.

## Active School Run

Haringey encourages a wide range of activities relating to school journeys, only a little of which is referred to in this Draft Plan. The School Journeys strategy, partly under the banner of the TfL sponsored STARS initiative, leaves action to be taken by individual schools.

This very short section of the Draft Plan is followed up by actions to:

- Improve school crossing points (£100,000)
- Support STARS (£80,000)

The second of these is already part of Haringey's policy for school journeys. Nothing else is proposed.

Air quality is vitally important for a safe active school run. The two forms of pollution most harmful to health are particulates and nitrogen dioxide (NO<sub>2</sub>). They have similarly harmful effects, but particulates are not referred to in the Draft Plan at all. This is a serious omission. Equally significantly the only action proposed for Haringey to undertake is 'anti-idling, signage, monitoring of equipment and pollution levels'. Much more than just monitoring is needed.

London's air pollution from small particles is well above the UN's safe level. The government's statutory objective was set by Parliament in 2010 at 20 micrograms per cubic metre ( $\mu\text{g}/\text{m}^3$ ), double the UN safe level at the time.<sup>2</sup> A 2010 study by Imperial College for

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<sup>2</sup> Regulation 25 Air Quality Standards Regulations 2010

the Mayor's office estimated that 4,300 deaths in London every year were due to small (2.5µm) particulates. In 2021 IQAir estimated that number as being 7,800. According to the Mayor's office more than 80% of the particle pollution in inner London is caused by road traffic. Archway Road, Highgate Hill and Highgate High Street show particularly high levels of particulates and of NO<sub>2</sub>, well above even the level in the UK objective.

The Breathe London Project which gave children air quality devices to carry with them on the way to and from school, had an immediate effect. The findings of the project, reported just this November, which enabled school children and their parents to see how the amount of pollution they breathed spiked when they travelled on certain routes, or travelled to and from school by car rather than walked, led to children and families being able to make decisions to reduce their personal exposure to pollution. One school reported a 54 per cent decrease in the number of people who drove their children to school following the study.<sup>3</sup> Overall, thirty-one per cent of children and parents changed the way they commuted to and from school to a healthier alternative, such as walking to school away from the main road. Wearable sensors like those used by children in the Breathe London Project are mass produced by Dyson and available through the Royal Brompton Hospital Respiratory Research Unit.

It should also be noted that many schools are situated on main roads. The importance of this is that the proposed introduction of cycle lanes and LTN's will displace traffic onto these roads and thus increase congestion and resultant air pollution round schools. Monitoring of air quality, as below, before and after implementation of any measures affecting traffic should be part of any plan and a budget allocated for the introduction of measures to protect the children from the impact of air pollution. Air quality monitors which can be fixed outside schools providing real time information to pupils, parents and staff would be a sound investment of educational as well as health value.

The Walking and Cycling Plan should include active measures to not only monitor NO<sub>2</sub> and particulates but take active measures to educate parents about the harm caused by air pollution and what they can do about it. It could be an effective way to reduce the traffic congestion round schools when children are delivered and collected by car, and at the same time to provide children with safer, healthier routes to school. As far as Highgate schools are concerned, evidence of liaison with LB Camden is essential.

## Active Travel and Development

There is a lot of useful detail in this section (Section 11), and dozens of initiatives are mentioned. Some of them are stated to be policies, others to be desirable. But they are not carried through to the Delivery Plan (Appendix C), where they do not appear. It is not therefore clear where Haringey's priorities lie in relation, for example, to taking the opportunities that developments offer to encourage and facilitate walking and cycling rather than car use.

We would like to comment on the detail of this section, but would wish to see where Haringey's priorities lie in terms of delivery of the numerous initiatives listed in order to do

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<sup>3</sup> Parents may imagine that children travelling by car are protected from pollution. This research helped them to understand that they are not: they breathe the same air as those who walk.

so constructively. We would hope to be able to comment on a further draft which would include the deliverables from this section.

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Small errors are not commented on, but we note that at Appendix C the Active Travel Projects are listed twice – at pages 90-91 and again at pages 91-2.

3.1.22