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3rd March 2025

Ref: Dartmouth Park Area Healthy Neighbourhood

Dear Sir/Madam,

Background

The Highgate Society has commissioned The Transportation Consultancy to review the work completed to date in support of the proposed Dartmouth Park Area Healthy Neighbourhood (herein 'the Neighbourhood') formed by the London Borough of Camden and the London Borough of Islington.

Purpose

The purpose of the review has been to consider the information used as a basis for developing the proposals to date and to assess, based on our professional opinion as transport consultants with experience of such schemes, the approach employed.

Approach

We have sought to engage with local highways officers, particularly in Camden, to explore any further information and / or assessments completed beyond that available in the public domain. In addition, data obtained from Freedom of Information requests, which is publicly available, has been reviewed. This includes, but is not limited to:

- Traffic surveys
- Forecast impacts on the highway network including queuing and vehicle delays
- Collision data reviews
- Optioneering

Given the proposals will impact upon roads managed by Haringey, most notably Highgate Hill / High Street, relevant parties at the London Borough of Haringey would be expected to be involved. This has been confirmed through correspondence with Haringey officers who have requested information and meetings with Camden and Islington counterparts to discuss the proposals and potential impacts on their roads.

This letter sets out our conclusions on the work undertaken to date in developing the proposals. The assessments to date have been compared to the standards and guidance which we would expect to be applied and consider the following:

- The consultation process
- Baseline data to be collected
- Ongoing monitoring to be undertaken (if the scheme is implemented)

Scheme Proposals

Camden and Islington state that the Neighbourhood proposals go beyond that of a Low Traffic Neighbourhood (LTN) but, for comparison purposes and given the similarities, we have considered the processes we would expect to be followed with regard to those for an LTN.

The document published by the Department for Transport (DfT) titled 'Implementing Low Traffic Neighbourhoods' (March 2024)¹ is currently in draft and will, once finalised, guide local authorities on the implementation of LTNs. Therefore, this guidance should be given due consideration when developing such proposals in order to ensure a consistent process is followed and carefully considered proposals are developed.

As set out in the DfT's guidance, an LTN is defined as:

"An area-wide traffic management scheme aimed at reducing or removing through traffic from residential areas, put in place using traffic signed restrictions or physical measures such as planters or bollards."

Based on this definition, and the typical size of an LTN being 1-1.5km² in size², it is considered that the Neighbourhood is unusually large in its size given the objectives of the project. This may be due to the evolution of the scheme from an earlier focus on smaller areas, including the traffic issues on Chetwynd Road, to the area which is now considered. It is our opinion that careful consideration should be given to the size of the area to ensure the proposals are both effective and implementable.

Scheme Objectives

The Commonplace website sets out the following scheme objectives:

- Make the area greener, healthier, and more pleasant to spend time in, with new plants, trees, and seating.
- Create safer streets in the area for children to travel independently, feel confident walking, scooting, and cycling, and with new areas for play.
- Reduce traffic in the area to make local streets quieter, less polluted, and safer to walk and cycle around.
- Support local businesses to thrive.
- Improve health and wellbeing through cleaner air and by making it easier to walk, cycle and wheel.³

It is acknowledged that the above high-level objectives have been set to guide the Phase 1 and 2 engagement process to garner the public's opinions on potential improvements in the area. However, upon reaching the Phase 3 consultation stage, it would be expected that these would be formed in greater detail; for example, this could be through the setting of 'SMART' targets. These targets will allow stakeholders to properly assess the potential impact of any proposals as well as allow detailed monitoring to take place. In our view, we would therefore expect to see clearly articulated objectives / targets at the Phase 3 consultation stage.

Legislative Framework

As set out in Part 2 of the Traffic Management Act 2004 Section 16(1), local highway authorities (LHA) have a 'Network Management Duty':

¹ <https://www.gov.uk/government/publications/implementing-low-traffic-neighbourhoods/implementing-low-traffic-neighbourhoods>

² <https://www.sustrans.org.uk/for-professionals/infrastructure/an-introductory-guide-to-low-traffic-neighbourhood-design/an-introductory-guide-to-low-traffic-neighbourhood-design-contents/3-low-traffic-neighbourhood-definition/>

³ <https://dartmouthpark.commonplace.is/en-GB/proposals/sample-content-walkingcycling-scheme/step1>

“It is the duty of a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives: (a) securing the expeditious movement of traffic on the authority’s road network; and, (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.”

As the term ‘traffic’ includes not only vehicle traffic but also pedestrians and cyclists, the duty requires the LHA to consider the movement of all road users. Therefore, securing the expeditious movement of vehicles should not be at the expense of road safety objectives, and rather should make best use of existing road space for the benefit of all road users.

Furthermore, the ‘Network Management Duty’ requires the LHA to consider the effects of its actions on the network of others. Not only will this ensure problems are not displaced elsewhere, but, more importantly, helps to achieve the most efficient operation of the entire network.

In a similar vein, as set out in the DfT’s statutory guidance, LTNs are typically implemented using Experimental Traffic Regulation Orders (ETRO) made under Section 9 of the Road Traffic Regulation Act 1984. These are used to trial schemes that may then be made permanent.

Before an ETRO is made “Authorities should collect appropriate data to build a robust evidence base on which to develop proposals and make decisions. This should demonstrate whether the intended impacts and outcomes of the scheme are observed, recognising the rationale for the investment and include traffic counts, pedestrian and cyclist counts, traffic speed, journey times both within and around the perimeter, patterns of traffic flow, air quality data (particularly the possible air quality impacts of displaced traffic), public opinion surveys and consultation responses.”

The remainder of this letter considers the data which we would expect to be collected in order to assess the potential impacts of the Neighbourhood proposals and support the implementation of an ETRO if the scheme is proceeded with.

Scheme Funding

As both Camden and Islington Councils have received funding for the scheme from Transport for London (TfL) as part of their Safer Corridors and Neighbourhoods funding stream, a number of conditions have been identified, namely:

- Scheme designs should be shared with TfL
- Attendance at the Road Space Performance Group (RSPG) may be required
- Development of designs are required to mitigate bus impacts

Whilst it is acknowledged that funding for the scheme has not been provided by the DfT, their statutory guidance provides clear guidance on processes and implementation. Firstly, and perhaps most pertinently, attention is drawn to the following which is stated in Paragraph 1 of the guidance:

“Increasingly and frustratingly, we [DfT] see larger and larger low traffic schemes being proposed by some councils despite concerted opposition by local residents and by local businesses, and in some cases being removed again. This guidance makes it clear that should not happen.”

Therefore, it should be ensured that any scheme proposed or implemented:

- is proportionate and appropriate to the area which it would affect;
- is as well designed as it can be; and
- the relevant data is available as a basis for the assessment of its success.

Consultation Process

As the proposals move from Phase 1 / 2 engagement to Phase 3 consultation, a clear, structured consultation process should be in place.

Public Consultation

As agreed at the Meeting of Culture and Environment Scrutiny Committee on 11th November 2024, the Phase 3 consultation will be a minimum of four weeks, with this extended as much as realistically possible, with the potential for a period of up to 12 weeks, to allow everyone who wishes to contribute to do so at a proper stage of the process. It should be ensured that, if the period is the minimum of four weeks, this is outside of the school holidays to provide a suitable time to undertake public consultation.

The DfT's guidance promotes a mix of approaches to consultation which should be undertaken including, as a minimum:

- A number of in-person events in the area affected by the scheme appropriate to the scale of the scheme, advertised well in advance;
- Online engagement; and
- Information leaflets delivered to all properties within the area of the scheme and a **scheme-appropriate radius of properties outside the area** [emphasis added].

As such, leaflets should be delivered to properties not only within the Neighbourhood boundary, but also to nearby properties which may be affected including Camden, Islington and Haringey roads. As per the DfT guidance, authorities should ensure schemes are developed with proper prior community engagement with local residents and businesses.

Consultation with Haringey

Given the borough boundary of Haringey forms a boundary to the Neighbourhood, it is vital that consultation be undertaken with Haringey officers to ensure their views on the proposals and impacts upon their network and community are properly accounted for.

As set out above, to ensure the proposals are appropriately managed, it is expected that the proposals would be implemented under an ETRO. On this basis, given the bus lane proposals on Highgate Hill / High Street and that Haringey are understood to manage half of the road, the proposals will have a direct impact on their highway. As such, given the proposals will affect Haringey roads, under Section 121B of the Road Traffic Regulation Act 1984, approval must be provided by Haringey Council for the implementation of the ETRO. It is therefore essential that effective and collaborative discussions are held between the three boroughs.

Statutory Consultees

As set out in the DfT guidance, authorities must engage statutory consultees and others. The statutory consultees include:

- Groups representing the freight industry
- Bus operators, i.e. TfL – the requirement for Islington to engage TfL to develop designs to mitigate bus impacts is specified as part of the funding conditions
- Ambulance and fire services
- Chiefs of police

Furthermore, as part of the conditions for funding provision to both Camden and Islington, scheme designs must be shared with TfL. Subsequently, once the final proposals are prepared, a decision will be made by TfL on whether modelling will be required. It is understood the responsibility for undertaking a traffic impact assessment, which may require the use of traffic modelling, sits with Camden and Islington as scheme proposer, with TfL supporting with technical advice, guidance and review as a stakeholder to inform its position under the Traffic Management Act 2004. As such, full and comprehensive baseline data would be required to inform any assessment or modelling.

Baseline Data

As set out in the DfT guidance, schemes should have clear aims and objectives, with a rationale and evidence to support intervention and measurable metrics of success. Possible impacts should be considered, and mitigations identified and developed. This should be achieved through the collection of appropriate data to build a robust evidence base.

Therefore, in order to aid scheme design, create appropriate targets and enable monitoring of progress during any initial implementation of the scheme through an ETRO, appropriate baseline data should be collected. Comprehensive data needs to be collected prior to and after a scheme has been implemented to measure the scheme's success in achieving its aims. The collection of this information will feed into the completion of the Healthy Streets Check for Designers, as required by TfL as part of the conditions of their funding provision.

Traffic Data

It is noted that baseline traffic data has been collected across 2023 / 2024 both on roads within the Neighbourhood, such as around Chetwynd Road and Hargrave Park, as well as on roads external to the Neighbourhood. However, there are key areas within the Neighbourhood which are excluded, namely Highgate Village and the roads around La Sainte Union Catholic School. The lack of data for roads in this area will mean the impact of the proposals, whether positive, negative or neutral, cannot be effectively monitored during their initial implementation.

Comprehensive traffic surveys to provide hourly traffic data for the full area should be undertaken across a neutral one month period to provide information on:

- Total traffic volumes
- Vehicle mix, i.e. bicycles / motorcycles / cars / delivery vans / HGVs
- Vehicle speeds

To ensure baseline data is available for the entire area, automatic traffic counters (ATCs) should be laid in the following locations in order to measure traffic volumes before scheme implementation:

- The Grove
- Highgate West Hill, between Highgate High Street and South Grove
- Pond Square
- Highgate High Street between Highgate West Hill and Hampstead Lane
- Highgate High Street between Highgate West Hill and South Grove
- North Road
- Southwood Lane

- South Grove between Highgate West Hill and Swains Lane
- South Grove between Swains Lane and Highgate High Street
- Swains Lane between Bisham Gardens and South Grove
- Bisham Gardens
- Cholmeley Park
- Cromwell Avenue
- St Albans Road
- Croftdown Road
- Woodsome Road
- Brookfield Park

In addition, further junction turning counts (JTCs) should be collected at the following locations:

- Highgate West Hill / Highgate High Street roundabout
- Highgate High Street / Hampstead Lane / North Road roundabout
- Highgate West Hill / South Grove / The Grove junction
- Highgate High Street / South Grove junction
- Highgate Hill / Dartmouth Park Hill / Hornsey Lane junction
- Archway Gyratory

A map is included at **Appendix A** which shows the proposed locations of the ATC and JTC surveys.

Whilst it is noted that a decision on whether modelling is required will be undertaken by TfL once the proposals are further developed, a high-level assessment of the expected change in traffic flows, including on boundary roads, should be undertaken. This would inform the setting of appropriate objectives and targets as well as to allow the relevant consultees to comment on the proposals.

A review of FoI data contained within the 'Camden LTN Design: Dartmouth Park Low Traffic Neighbourhood Baseline Analysis' (2021) report contains traffic flow information which has not been included within the Neighbourhood Proposals Overview document and is considered pertinent to allow stakeholders, including Haringey, to assess the proposals. This information should therefore be made available as part of the Neighbourhood proposals information and updated data collected to supplement it.

We note that Haringey officers have requested the following information and reasonings:

- **"Proposal Timelines and Next Steps:** Could you please provide detailed timelines for the Dartmouth Park proposal, including key milestones and the next steps in the process?
- **Hourly Traffic Data:** We are interested in obtaining hourly traffic data for the area. This data will help us analyse traffic patterns and assess the impact of the proposed changes in Haringey.
- **Turning Movements:** Detailed information on turning movements at key intersections within the proposal area would be greatly appreciated. This will assist in evaluating traffic flow and safety considerations.
- **Current Designs:** If there are any preliminary designs or drafts available for the Dartmouth Park proposal, we would like to review them to provide informed feedback.

- **Consultation Details Affecting Haringey:** Lastly, we request any specific details regarding how the consultation and proposed changes will affect the Haringey area. This information is crucial for us to understand the broader impact on our community.”

Journey Times

Journey time data both within / through the Neighbourhood as well as along boundary roads would be required both to monitor progress towards the scheme’s targets as well as to ensure the proposals do not have a disproportionate impact on roads outside the area.

Journey time surveys should be undertaken across different days, i.e. weekdays, Saturdays and Sundays, as well as at different times of day, i.e. morning and evening peaks, school pick-up / drop-off times.

Bus Services

Information should be requested from TfL on existing bus journey times and patronage through the area and along boundary roads. Based on the expected changes in journey routing, high-level analysis should be undertaken to understand the potential impact of the proposals on public transport journey times and capacity. This is key to ensuring residents continue to have access to reliable public transport which provides an alternative to private car travel.

In addition, as set out in TfL’s Supplementary Guidance on Low Traffic Neighbourhoods (Appendix 6A), boroughs should consult TfL to discuss how proposals may affect local bus routes including journey times, both along boundary roads and any routes that go through a proposed Neighbourhood. This is reiterated as part of Islington’s funding conditions which requires the development of designs to mitigate bus impacts in consultation with TfL.

Air Quality Data

Given the scheme’s aims to improve health and wellbeing through cleaner air, up-to-date air quality data should be utilised for baseline monitoring; this should record both NO₂ and PM_{2.5} / PM₁₀ emissions. This will allow a clear target to be set to monitor the proposals’ impacts both within the Neighbourhood boundary and along the boundary roads.

Collision Data

Up-to-date analysis of the latest available collision data should be undertaken in order to accurately understand any existing collision hotspots. Based on the expected changes in journey routing, consideration should be given as to whether the proposals will have an impact on existing collision hotspots and subsequently whether any additional measures to ensure proposals do not have a detrimental impact on highway safety in other locations need to be implemented.

We have undertaken an updated review of collisions over the last five year three month period (until March 2024) which shows a total of 307 collisions have occurred within the Neighbourhood and along boundary roads. Of these, 195 (64%) of these were on boundary roads therefore highlighting the importance of considering the impacts on the boundary roads.

Monitoring

As part of the conditions for TfL funding provision, outcome monitoring of the scheme must be undertaken. This will allow Camden and Islington Councils to review measures ensuring they continue to meet their objectives, are not adversely affecting other areas and are locally supported. Monitoring should include:

- Impacts on traffic volumes
- Impacts on vehicle mix
- Impacts on vehicle speeds
- Impacts on vehicle routing
- Impacts on journey times
- Impacts on bus services
- Impacts on air quality
- Impacts on collisions

As per the DfT's guidance, schemes installed using ETROs are subject to a requirement for ongoing consultation for 6 months once in place, including with statutory consultees such as bus operators, emergency services and freight industry representatives. This consultation allows a trial scheme to be adjusted in the light of experience and feedback. Schemes should be monitored and evaluated to help make decisions as to whether the scheme should be made permanent and, if so, in what form.

Summary

The Transportation Consultancy hopes that the information contained within this letter supports the development of any forthcoming scheme.

Yours faithfully,

The Transportation Consultancy

Appendix A

Anticipated Survey Location Map

