



Input to Consultation on four Active Travel Fund schemes

We congratulate Brighton & Hove City Council on gaining additional funding for improvements to active travel in the city.

We welcome the opportunity to contribute to the development of the improvements to travel and transport in Brighton and Hove in four areas. We have completed the formal questionnaires and also want to add a number of more general and specific points (below) about the proposals that have been put out for consultation.

The *objectives* of the Brighton & Hove City Council proposals match our own: Living Streets Brighton and Hove¹ is primarily concerned with creating safer, cleaner, greener streets and neighbourhoods to create a better walking environment and inspire people to walk more.

Generally, we have not commented on the proposed improvements for cycling as there are many other groups in Brighton who will be doing that. However, we do want to say explicitly that we welcome many of the proposals for improving cycling in the city, including recognising that cycle lanes also often have benefits for the safety of pedestrians. For example, the introduction of cycle lanes on the seafront / A259 and the Old Shoreham Road seem to have reduced the speed of motor traffic which makes crossing for pedestrians easier and safer as well as protecting cyclists.

Overall comments

- **More priority for walking, as well as cycling.** Some of the consultation leaflets say "This funding will be used to provide a safer, more attractive environment for pedestrians, bus users, cyclists and taxis." However, the proposals give significantly more attention to improving facilities and access for cyclists and cycling, and much less attention to safety for pedestrians or encouraging more people to walk. It is important to redress the balance.

This is particularly the case on the seafront / A259, where there is almost nothing in the proposals for pedestrians and, where there are currently conflicts between pedestrians and cyclists (e.g. shared space), these problems have not been addressed. Specific comments on the need for more priority to be given to pedestrians across the four schemes are given below.

¹ Living Streets Local Groups are part of the UK charity for everyday walking. We want to create a walking nation where people of all generations enjoy the benefits that this simple act brings, on streets fit for walking.

- **Reduce speed limits.** As the most recent guidance from the Department for Transport clearly states: “in association with other measures, reducing the speed limit can provide a more attractive and safer environment for walking and cycling”². In Brighton and Hove we do have some 20mph limits and these need to be extended across all these schemes. As this DfT guidance points out, 20mph limits are appropriate both for residential routes and through streets. Reducing speed limits is probably the most important safety issue for pedestrians, cyclists and other road users and would support the other measures proposed. Additional signs, road markings and other measures to slow traffic are needed.
- **Remove pedestrian guardrails.** The Active Travel Fund resources could be used to make a major and very visible contribution to Brighton and Hove becoming a safer city for walking as well as cycling by removing all guardrails on all the locations for improvement. Evidence shows that the removal of guardrails is proven to reduce collisions with pedestrians³. Guardrails give an impression of vehicle dominance, restrict pedestrian movement and add visual as well as physical barriers to pedestrian movement. They also disrupt pedestrian desire lines and so discourage pedestrian journeys.
- **Improve messaging and consultation.** We welcome your efforts to gain input from a wide range of citizens and interest groups to these proposed schemes. However, given the resources being invested in the consultation, we do feel more could be achieved to support the work BHCC are doing. It is not too late for far greater emphasis to be placed on listening to feedback and changing the proposals to reflect all aspirations and concerns.

There is a real opportunity now to show Brighton and Hove citizens, businesses and others that their views and concerns are taken seriously by Brighton & Hove City Council, and not simply about fine-tuning the details of schemes that have been largely decided already.

We have picked up that many people have been dissatisfied with the consultation process so far, particularly in relation to the information provided. These issues could be resolved with careful planning of feedback after the event, to build trust:

- **Information.** The information provided on the consultation leaflets is not sufficiently clear and detailed to enable people to respond e.g. just talking about “improvements” is not sufficient: what sort of improvements? More detail is also needed on the overall process - what has happened and what will happen and when, what will happen next and what opportunities will there be to input in future (and how that will work). It may be useful to provide a simple diagram showing how all the different travel and transport plans, consultations, strategies etc relate to each other both in terms of hierarchy of what governs what, and how the timescales relate.
- **Building trust.** Consultation can build trust between the council, stakeholders and local citizens, but that only happens if consultation is done well. Poor consultation can reinforce the feeling that local people have no real voice, and that the consultation is simply a tick box exercise with no impact on decisions and priorities.

² Department for Transport Statutory Guidance, 2021: *Traffic Management Act 2004: network management in response to COVID-19*, Updated 25 February 2021. <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>.

³ Street Behaviour report for Transport for London, July 2017. *Collisions Before and After the Removal of Pedestrian Railings at 70 Junctions and Crossings on the Transport for London Road Network*.

People need to be reassured that their input will be *taken into account* in drawing up detailed proposals which means better reporting back on what people have said (not just ‘categories’ of points made). If people’s input cannot be accepted as the way forward (which may be entirely legitimate), the reasons for those decisions need to be explained.

- **Greening.** The new trees planned for Western Road are very welcome and more roadside greening would help control pollution from vehicles as well as making the streets feel more welcoming and less focused on traffic rushing through. This should be considered a safety measure, making streets feel calmer, softer and more attractive as well as reducing air pollution.
- **Floating bus stops.** The proposals for floating bus stops and shared spaces between pedestrians and cyclists at bus stops do raise questions about safety for pedestrians. If bus stops do not feel safe, people will not use them, which will seriously disadvantage those bus passengers who are most vulnerable.

We feel, as the TRL report for the Department of Transport⁴ says, that the problem with floating bus stops etc is that “while the objective of separating cyclists and motorised vehicles is achieved, it creates potential conflict between two other groups of people, namely cyclists and pedestrians.” The same point is made in LTN 1/20 on Cycle Infrastructure Design guidance⁵, paras 6.6.6 and 6.6.8. This conflict can cause anxiety among pedestrians and deter them from using bus stops where there is conflict with a cycle lane (TRL research again).

We are not opposed to these bus stops in principle - as long as they are safe and are designed and implemented sensitively. Context and design are the key issues for floating bus stops:

- **Context.** It is difficult to comment in detail on the proposals for floating bus stops as the specific locations are not shown on the maps. However, given traffic and cycle speeds it is more appropriate for these to be used where the street on which they are located is seen primarily as a traffic thoroughfare – on which basis the A23 could be appropriate but the Seafront / A259 and Western Road would not, being key visitor and leisure areas and/or in the middle of town where **people** are the primary focus – not the road.
- **Design.** As you will be aware the Cycle Infrastructure Design guidance LTN 1/20 (see above) covers many of the relevant issues. Taking that guidance, the TRL research and other suggestions, the key points for us on design are:
 - **adequate space for the bus stop**, especially on the island where the bus stop is located including space for two wheelchairs to pass, litter bins, shelter and any other necessary furniture for bus users (a minimum 2.5 metres wide);
 - **a formal pedestrian crossing** of the cycle lane with at least a zebra crossing, or signal controls if cycle speeds are likely to be high;
 - **the road level raised to pavement level** at the crossing so the surface is level for pedestrians and cycle speeds are reduced, and the priority for pedestrians reinforced;

⁴ *Accessible Public Realm: Updating Guidance and Further Research. Annex 5. Review of potential new topics for inclusion in guidance*, Report by RLP Ltd for Department of Transport, January 2020.

⁵ *Cycle Infrastructure Design. Local Transport Note 1/20*. Department of Transport, July 2020.

- **awareness raising for cyclists** to ensure they understand that pedestrians have priority on these crossings: the TRL research found that only “40% of cyclists gave way to pedestrians at a zebra crossing” (page 18); this is not good enough to make pedestrians feel safe on such crossings
- **tactile paving** to alert people with visual impairment / guide dogs to negotiate crossings (detailed consultation will be needed with groups representing people with visual impairment and other disabilities).

We would also like to see discussions with bus companies to bring in announcements on buses to warn passengers that they are about to cross a cycle lane.

- **Remove clutter and tackle vandalism.** Some of the problems on all the routes being considered for improvement are not directly about the roads themselves. These may need joint work with City Clean. For example:
 - **Waste and recycling bins.** Sufficient household waste and recycling bins are needed, sensitively sited to maximise pedestrian access around the city. Pavements and sight lines for crossing are often obstructed by large bins, creating safety hazards. Commercial bins should not be allowed on the streets except immediately before scheduled collections.
 - **Litter and graffiti** contribute to streets feeling unsafe, unattractive and therefore discourage people travelling around the city on foot. Insufficient poorly sited bins create rubbish on the streets and attract graffiti – a vicious circle. People don’t want to walk through what can feel like a rubbish dump in the streets in some places.

Western Road

- **We welcome** the planned improvements to crossings at side roads with greater priority for pedestrians, retaining the temporarily widened pavements outside Waitrose, and improvements to pedestrian crossings at Dyke Road and the Clock Tower (although unclear what these are). However, these are fairly minimal improvements and more could be done.
- **We also welcome** plans to make “Improvements to pedestrian crossings across Western Road”, opposite Churchill Square but, again, unclear what these are. It looks as though that is a very specific point on the street - there need to be improvements to pedestrian crossings all along the section of Western Road covered by the scheme. Here too it would make a major difference if all guardrails were removed and a wide central raised pedestrian refuge was created all the way along the street, so that people can cross half the street at a time at any point.
- **Not a priority.** Resurfacing roads or pavements would not seem to be a priority, given other issues – and assuming that this is not about maintenance or repair but changes. However, it depends what is actually meant by resurfacing – aesthetic changes are not essential; safety changes may be.
- **Pavement parking.** There need to be more controls on the large numbers of cars and taxis picking up and dropping off in Western Road. This is particularly a problem for sight-impaired pedestrians.
- **Question.** What is meant by the “widening of the road to allow two-way movement” through the section of Western Road near Churchill Square? How will that affect pedestrians?

A23

- **We welcome** proposals to widen the pavement on Preston Road. It is very narrow and there are real bottlenecks at present for pedestrians at various points. However, it is not clear from the information where this widening will take place.
- **More for pedestrians.** There are very minimal improvements for pedestrians in these proposals. There need to be more pedestrian crossings, ideally as proposed above involving the removal of guardrails and creating large central refuges, especially on the section from Preston Circus to Varndean Road to allow for crossing to Preston Park station and the health clinics on Preston Road opposite Preston Park. This would allow for the road to be crossed in two halves in more places. More zebra and traffic light controlled pedestrian crossings along the route are also needed. There are particular problems on crossings at the end of Lovers Walk and Dyke Road Drive.
- **Floating bus stops.** See Overall Points above.

Old Shoreham Road

- **We support the cycle lanes** already in operation on the Old Shoreham Road, with improvements to increase safety for cyclists where necessary. Reducing the traffic to two lanes helps to reduce speeds and make crossing easier for pedestrians.
- **We welcome** the new pedestrian crossing at the Newtown Road junction.
- **We would not want to see** the island outside Hove Park "narrower". Traffic islands are essential for the safety of pedestrians. More details on what is proposed are needed. We would also like to see all guardrails removed – as in the Overall Points above.

Seafront / A259

- **Improvements for pedestrians.** There is a real opportunity with this funding to make clear to Brighton and Hove residents – and visitors – that we want to encourage people to walk around the city as much as possible, as well as cycling in safety. It is therefore particularly disappointing that there is nothing new at all in the draft proposals for pedestrians along the seafront - probably the most high profile and important route in the city for visitors on foot as well as residents.

Having just completed the questionnaire for this consultation, it is very disappointing to see no questions at all about walking on the seafront. Given that walking is the mode of transport that is most extensive and popular on this route, that seems a dangerous omission.

- **We need action immediately on separating cycle lanes from pavements.** We welcome the long term aim of creating a two-way protected cycle lane in the road. However, current arrangements, with cycle lanes on the pavements sharing space with pedestrians in many places, are very confusing and are a serious disincentive for people on foot who are having to negotiate crossing cycle lanes as well as the very busy road.

We totally support safety for cyclists and there needs to be equal consideration about safety for pedestrians, and measures to protect some of the most vulnerable residents and visitors on the seafront.

Mention is also made in the proposals of “shared space between bus passengers and cyclists”. Please see points about floating bus stops above in Overall Comments – these apply equally to whatever arrangements are planned for ‘shared spaces’ around bus stops on the A259.

- **Remove all guardrails.** The seafront should be the top priority for the removal of all guardrails in the city. Removal of guardrails would reduce the major visual and physical barrier that the road itself already presents between the town and the sea for pedestrians and visitors, and would contribute significantly to a “safer, more attractive environment for pedestrians”, as these proposals intend. It would also be a very clear message to drivers that Brighton and Hove is a safe and attractive place for people to visit on foot, as well as on wheels.

It could make sense to retain the upright posts / bollards between the traditional barriers on the seafront road (where there are the traditional barriers) and simply remove the barriers in between. This has already been done in some places on the seafront and would serve the purpose of ensuring the traffic does not encroach on the pavements while allowing pedestrians better access to crossing the road.

- **Make crossings more frequent, direct and safer.** The wide central raised pedestrian refuges which already exist in some places along the seafront road should be extended along the entire route covered by these proposals. This would allow people to safely cross half the road at a time, as well as helping to calm traffic speeds.

There will still be a need for formal crossings controlled by lights, as well as opportunities to cross at other points safely to the refuge in the middle. Along with the removal of guardrails, this would dramatically change the whole visual aspect of this route, making it much safer as well as much more attractive and welcoming for pedestrians

- **Greening.** More planting, trees, shrubs etc along the seafront route would humanise the whole route and make it less like a motorway, designed to give priority to motor vehicles. It would soften the road and make it safer and more welcoming for pedestrians of all ages and abilities.

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