



## **Draft LCWIP 2021 – Response from Living Streets Brighton and Hove**

We welcome the opportunity to contribute to the development of Brighton and Hove City Council's Local Cycling and Walking Infrastructure Plan (LCWIP) 2021 and are grateful for the opportunities to discuss the early thinking on the plan in stakeholder workshops.

Living Streets Brighton and Hove<sup>1</sup> is primarily concerned with creating safer, cleaner, greener streets and neighbourhoods to create a better walking environment and inspire people to walk more. We have therefore commented almost exclusively on issues for walking (which includes wheelchairs etc.), and not on issues for cycling.

However, we recognise that improvements for cycling almost always also benefit walking and that the two are closely linked, as in this plan. For example, segregated cycle lanes protect cyclists from motor traffic and remove the safety incentive for cycling on pavements which is unsafe for pedestrians; and cycle lanes very often reduce traffic speeds by reducing lane widths which makes crossing for pedestrians easier and safer.

Unfortunately, the draft plan does not seem to recognise these synergies. The separation of priority routes and areas for cycling and walking undermines the connections between the two. It would make more sense to have a single set of priority routes and areas for both walking and cycling together, so that changes not only reinforce the benefits of improvements but also ensure that nothing is done to improve one to the detriment of the other.

We welcome the impressive aim of the plan (p4): “setting out our strategic actions for improvements to the active travel network in the city, covering the next ten years”. We also welcome the objectives of the LCWIP – to create a network of safe and convenient routes and quality infrastructure to enable people to use active travel more in the future. We also welcome the ambition of the LCWIP, to develop a strategic document, which (as Amy Heley's Foreword makes clear, p3) is intended to be “the foundation for creating a city which makes active travel easy, safe and accessible” by building an infrastructure to make it easier for people to travel on foot or by cycle.

However, the draft plan as it stands doesn't provide any clear actions or provide a practical foundation for the detailed plans and action that will follow in the coming years to create safe, easy and accessible streets. The draft leaps from considering national and local policies to focusing on specific routes and areas with no real analysis of the specific existing problems and

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<sup>1</sup> 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. See our webpage <https://www.livingstreets.org.uk/get-involved/local-groups/brighton-and-hove>.

opportunities throughout the city. Rather than abstract themes (p18 - 19), It would be more useful to understand these existing problems and opportunities, then identify the priority routes and areas so we can be clear where these will be tackled first. At the moment, it is not entirely clear how the priority routes and areas have been identified.

At the very least, the key outcomes and themes (p18 – 19) should include some mention of the existing barriers. Where you do mention challenges in the existing context (p20 – 21), these are very broad, mostly national and use some quite old data. This analysis does not really provide a basis for prioritising tackling the basic problems that people face today across the city.

In addition, while we understand the focus of the LCWIP is on infrastructure , rather than wider supporting improvements (p6), the main approach appears to be to offer engineering solutions, which are usually expensive, time-consuming and disruptive and which will therefore require extensive external funding and take many years to achieve.

Engineering solutions are not the same as infrastructure. Infrastructure can include much quicker, easier and cheaper solutions such as signage and road markings (e.g. on speed limits and zebras) alongside programmes of enforcement, communications and engagement.

We welcome the ideas for possible improvements (p45 - 50), and recognise that at this stage there are not detailed design proposals on any specific routes or areas. Unfortunately this means that there is no sense of priority as to which of these improvements are vital to increase the safety and attractiveness of our streets to encourage walking, or indeed that any of them will necessarily happen at all. It feels like a wish list of ideas rather than a set of strategic actions.

We therefore propose that the plan should include three additional strategic objectives, possibly in a redrawing of Figure 3 (p8) or as part of a reworking of the LCWIP themes (p18), Certainly we would like to see these objectives accepted as strategic priorities that underpin the whole LCWIP. These three strategic objectives are:

- Reducing traffic speed limits across the city to 20mph.
- Removing existing obstacles to safe walking in the city.
- Increasing investment in enforcement, monitoring and engagement.

Each of these three issues is covered in more detail below. That is followed by a short set of specific suggestions on the text of the draft plan.

### **Reducing traffic speed limits across the city to 20mph**

We note that at the very start of the draft LCWIP (p4), you recognise that people are concerned about road danger<sup>2</sup>. You show how 78.2% of respondents to that earlier consultation agreed that the council should take action on improving road safety; 773 respondents said that lower traffic speeds would encourage them to walk more; 1,008 said they would cycle more. We also know from the various petitions and questions raised by councillors and the public at BHCC committees that a key issue affecting perceptions of road danger is traffic speeds.

We note that you mention reducing speed limits in particular areas (p34), including Low Traffic Neighbourhoods (LTNs), but with no information on how these will be developed or prioritised.

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<sup>2</sup> <https://present.brighton-hove.gov.uk/documents/s168527/Active%20Travel%20Fund%20APX.%20n%201.pdf> Active Travel Fund consultation, Brighton & Hove City Council 2021 (p27)

We also note that you have mentioned “speed limit reduction and associated traffic calming measures” (p47), but with no actual speed limit specified. This minimal approach does not match the apparent ambition of the LCWIP. It is still a piecemeal rather than strategic approach.

We really need to see a more strategic city-wide approach to road safety, especially for people walking but also people cycling or driving - starting with reducing speed limits throughout the city to 20mph. This approach can *start* with the priority areas you have identified (and not just LTNs) but it needs to make that a starting point for a city-wide approach which can be agreed now.

Brighton & Hove City Council has innovated in the past by bringing in 20mph speed limits, with the third tranche of 20mph areas approved by the ETS Committee in March 2015. These developments are welcome but are piecemeal and insufficient. We are now lagging behind many other places. For example, in 2020, Transport for London reduced the speed limits on all the roads they operate and manage within central London Congestion Charging Zone<sup>3</sup> to 20mph, including major arterial routes such as Kings Cross Road and Albert Embankment. By 2018, half the largest urban authorities in the UK had a policy of setting 20mph as the default for their streets<sup>4</sup>.

The most recent guidance from the Department for Transport (2021) suggests reducing speed limits for residential roads and many through streets in built-up areas to 20mph and states that: “in association with other measures, reducing the speed limit can provide a more attractive and safer environment for walking and cycling”<sup>5</sup>. This would seem to be precisely the objective of the LCWIP.

The evidence to support a city-wide 20mph speed limit includes:

- **Traffic speeds in the city are already less than 20mph.** One of the factors the DfT recommend is taken into account in setting an appropriate speed limit is existing traffic speeds<sup>6</sup>. It says that 20mph across a large number of roads “should be considered where mean speeds at or below 24mph are already achieved over a number of roads” (para 97). It also says that “if the mean speed is already at or below 24mph on a road, introducing a 20mph speed limit through signing alone is likely to lead to general compliance with the new speed limit” (para 95).

In Brighton and Hove, the average speeds are already below 20mph. In 2020, the average speed was 18.2mph<sup>7</sup>. This was up from 16.8 in 2019 (apparently due to emptier roads during lockdowns). So arguments that reducing the speed limit will make journeys slower are not valid; the average speed is already lower than 20mph.

- **Fewer, and less severe, accidents.** Lower road speeds reduce accidents – for all road users – which is surely a key element of encouraging more walking and cycling. DfT guidance states<sup>8</sup>:

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<sup>3</sup> <https://tfl.gov.uk/corporate/safety-and-security/road-safety/safe-speeds>.

<sup>4</sup> *20mph Research Study. Process and Impact Evaluation Headline Report*, November 2018. W.S. Atkins for Department for Transport.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757307/20mph-headline-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf)

<sup>5</sup> Department for Transport Statutory Guidance, 2021: *Traffic Management Act 2004: network management in response to COVID-19*, Updated 30 July 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#contents>

<sup>6</sup> <https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits>. Department for Transport, 2013, p29

<sup>7</sup> <https://www.theargus.co.uk/news/19135528.covid-motorists-speeds-brighton-hove-main-roads/>

<sup>8</sup> <https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits>. Department for Transport, 2013

“As a general rule for every 1mph reduction in average speed, collision frequency reduces by around 5% (Taylor, Lynam and Baruya, 2000). For typical types of road traffic collisions the risk of death for drivers and pedestrians involved reduces with reduced vehicle speeds and it is particularly important to consider those speeds where the balance tips in favour of survival.”

- **Less pollution.** Slower traffic is quieter, creating less noise pollution. We have increasing evidence of the damage that noise pollution – and in particular road traffic noise - can cause to people’s mental and physical health<sup>9</sup>. Reduced traffic speeds can also contribute to improving air quality; contrary to current myths, slower traffic does not increase air pollution or reduce air quality<sup>10</sup>.
- **A potentially low-cost, high impact approach to road safety.** Actions to set, control and enforce 20mph speed limits have often been seen as difficult and expensive. However, recent research shows that this can be done relatively inexpensively, with extensive evidence now showing that signage and road markings alone (without expensive engineering work) can be highly effective<sup>11</sup>.

The last review of a city-wide 20mph speed limit was in 2010 and a great deal has changed in Brighton and Hove over the past 11 years. It is clearly time for another review. This should be seen as an integral part of the LCWIP strategic approach because it impacts so many of the other elements of the plan. At present, the need for a city-wide 20mph speed limit is shown nowhere in the draft LCWIP and is a major omission that must be addressed.

### Removing obstacles to safe walking

We note that you recognise that “many local residents rate their local pavement conditions as poor”<sup>12</sup>, and we welcome the ideas for improvement in your list of possible changes (p45 – 50). We also very much welcome a mention of decluttering (p 46), and other ideas for improving the quality of pavements.

However, as the introductory text to the plan clearly states, there is no commitment to making any of the potential changes identified in the plan, and no sense of which are the priorities. We would therefore like to propose some initial priorities to tackle existing obstacles:

- **Remove pedestrian guard rails.** These railings send a signal to everyone in the city that the streets are designed for motor vehicles and that pedestrians should keep off the roads. We need to get them removed throughout the city, starting in the priority routes and areas identified in the LCWIP.

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<sup>9</sup> Noise pollution is a major problem, both for human health and the environment. European Environment Agency, Updated May 2021. <https://www.eea.europa.eu/articles/noise-pollution-is-a-major>

<sup>10</sup> *The state of the evidence on 20mph speed limits with regards to road safety, active travel and air pollution impacts. A Literature Review of the Evidence*, for the Welsh Government. August 2018.

<https://gov.wales/sites/default/files/publications/2019-08/the-state-of-the-evidence-on-20mph-speed-limits-with-regards-to-road-safety-active-travel-and-air-pollution-impacts-august-2018.pdf>. *The state of the evidence on 20mph speed limits with regards to road safety, active travel and air pollution impacts. A Literature Review of the Evidence*, for the Welsh Government. August 2018.

<sup>11</sup> *20mph Research Study. Process and Impact Evaluation Headline Report*, November 2018. W.S. Atkins for Department for Transport.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757307/20mph-headline-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf)

<sup>12</sup> <https://present.brighton-hove.gov.uk/documents/s168527/Active%20Travel%20Fund%20APX.%20n%201.pdf>.

Brighton & Hove City Council 2021 (p22, 35-38, 45-49, 54-58, 63-67)

There is now clear evidence that removing pedestrian barriers significantly reduces collisions, including a fall of 56% in pedestrians being killed or severely injured (KSI) and a fall of 48% in the number of all KSI collisions<sup>13</sup>.

It would make a major contribution to creating safe and welcoming streets for residents and visitors to remove all pedestrian barriers across the city as a priority. This would be a very simple, inexpensive and highly visible change that would show residents and visitors alike that the city welcomes people walking.

- **Remove other obstructions on pavements.** Sometimes making improvements requires taking things away rather than putting things in. The draft LCWIP identifies some of the issues around obstructions on pavements but, given your focus on infrastructure, perhaps one obvious default measure should be to increase the minimum pavement width across the city from the current 1.3 or 1.5 metres to 2 metres, again starting with the priority streets and areas. We are aware that this is not possible in some of our narrow streets, but we do need to improve the basic standards that we are seeking. This would provide the basis for starting to tackle some of the most common pavement obstructions.

We understand that there is a review of the siting of communal bins, action to remove commercial bins from the streets in the city centre, and a review of wheelie bins. There is mention in the draft LCWIP (p46) of better positioning of rubbish bins, but no mention of simply saying “no bins on the pavement”. One of the key criteria for bin siting decisions as a result of the current review needs to link to the LCWIP by ensuring that bins are no longer ever placed on the pavement, or are creating obstructions to sight lines for pedestrians (and drivers seeing pedestrians) when bins are sited on roads.

In addition, at the very least, the LCWIP should include a commitment to enforce existing regulations on pavement obstructions and to ensure that no future changes in the city will result in more obstructions on pavements. In addition, we need clear guidance that no control boxes (e.g. for traffic signals and EV charging), signage, communal bins, cycle hangars, bike hubs, etc. will be put on to pavements. If these installations are vehicle related, they should go on the road.

- **Stop pavement parking.** Pavement parking is already illegal in London and Scotland and we understand that the DfT consultation on this issue in 2020 has been analysed and reported and is awaiting a ministerial decision. When that happens, it will need to be enforced. In the meantime, it would be useful to include in the list of potential improvements a new role for traffic wardens to put notices on cars parked on the pavement to say that pavement parking is not acceptable in the city. That would at least start a communications campaign that could be increased once the national legal position is clarified.

### **Increasing investment in enforcement, maintenance, monitoring and engagement**

Many of the proposed improvements identified (p45 – 50) will require enforcement. Existing rules and regulations are not always adhered to and there seems little point in creating new changes and improvements that are not enforced or maintained. There needs to be early planning and budgeting to support adequate maintenance, monitoring and enforcement.

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<sup>13</sup> *Collisions Before and After the Removal of Pedestrian Railings at 70 Junctions and Crossings on the Transport for London Road Network*. Street Behaviour for Transport for London, 2017. <https://content.tfl.gov.uk/pedestrian-railings-removal-report.pdf>

Engagement is not necessary for every single action but, in many cases, engaging local people in identifying the specific changes needed can draw on local knowledge about what can work and where and, therefore, reduce some of the need for monitoring and enforcement. These activities are an essential part of the infrastructure of change and require as much consideration for investment of time, money and expertise as physical solutions.

Brighton & Hove City Council has often been very proactive and successful in engaging local citizens. The stakeholder engagement on the LCWIP, and other transport developments, is often exemplary. It is good to see recognition of the need to involve people in design and delivery of the LCWIP (p18). Indeed, one of the ten key recommendations of the Climate Assembly was that “The council should actively consult and engage with the community”<sup>14</sup>.

Better engagement can help overcome conflict and opposition – often based on misunderstandings and fear of change with no chance of influencing what happens. Planning engagement needs to start by understanding that the vast majority of people are not necessarily against change to improve walking and cycling.

There are misconceptions of the level of public opposition to improvements to walking and cycling, which can lead to a reluctance to extend engagement. The DfT’s *Gear Change: One Year On* guidance suggests that the fear of opposition to walking and cycling improvements is overstated. This guidance shows that there is clear evidence that although there is a belief (including among the public) that there is *generally* opposition to improvements to walking and cycling schemes, there actually is not<sup>15</sup>.

That research shows “consistent public support for the measures on cycling and walking” taken by national and local government. Furthermore, the same research suggests that the majority ‘tend to support’ or ‘tend to oppose’ rather than feeling very strongly about these changes: “Only a very small minority express strong opposition, typically between 7 and 15 per cent of overall respondents”. This is a tiny minority of strong opposition, often accorded far more weight than it deserves, and undermining good open local engagement and positive change.

There are numerous practical reasons to improve engagement. Good engagement can:

- contribute to behaviour change by gaining involvement in identifying the right solutions in different places;
- enable developments to proceed more quickly, because concerns can be addressed (and plans changed) before opposition becomes entrenched;
- help build relationships of trust and understanding between local citizens and the council;
- provide effective and relatively inexpensive risk management for authorities, identifying areas of risk of conflict early so they don’t escalate.

Engagement should not be:

- used to ‘sell’ change; this approach breeds distrust
- a tick box exercise that pays lip service to listening to local citizens which then ignores their input about their hopes and concerns.

Good engagement can identify where there is common ground among citizens, and where there is conflict. It can find the solutions that command popular support and allow those to proceed. It

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<sup>14</sup> <https://www.brighton-hove.gov.uk/brighton-hove-climate-assembly>

<sup>15</sup> *Gear Change: One Year On*. Department for Transport, 2021, page 30.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1007815/gear-change-one-year-on.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007815/gear-change-one-year-on.pdf)

does not ignore conflict, but helps manage it. As has often been said – if you think engagement is expensive, try conflict.

Neighbourhood improvements (e.g. LTNs) provide opportunities for deeper local community engagement. For example, BHCC could run mini-citizens assemblies wherever a low traffic neighbourhood or 20 Minute Neighbourhood or mini-Holland is proposed, to allow local people to positively and pro-actively engage in improvements to their communities.

More generally, sharing the results of wider scale consultations can also be used to clarify how the results have been used in final proposals for improvement, and satisfy those involved that their views have been taken into account.

None of this engagement should or could replace political decision making; it supplements and informs that decision making by ensuring that citizens' input, potential contributions and concerns are understood and treated with respect.

Beyond engagement in decision making, there are also numerous opportunities for active citizens to participate in achieving some of the objectives of the LCWIP directly, such as:

- reporting issues of concern to help with monitoring and collecting data (with training and support)
- help with enforcement by continuing to monitor what is happening on the ground.

Civic or citizen science is used internationally to draw on the ability and willingness of ordinary people to contribute to collecting scientific and technical data and has been used equally well at local level. It can help make data collection more open, transparent and accountable as well as contributing to enforcement by identifying specific breaches of regulations.

Enforcement and engagement are examples of the very basic activities that underpin and reinforce the ambitions of the LCWIP, and offers relatively inexpensive ways to embed change in sustainable ways. It must be part of the infrastructure of change that is needed and it would be a great shame if the need to invest in these essential aspects of managing change continue to be overlooked.

### **Specific drafting points**

- **The LCWIP maps.** It is actually very difficult to read and interpret the maps in the document, to see the priority routes and the boundaries of the priority areas, or interpret the data on the maps generally, even when the size of the map is increased.
- **Trees and other planting.** We very much welcome the emphasis on greening including tree and other planting. It would be useful to see a mention in the LCWIP of the contribution that tree planting can make to tackling climate change and managing pollution, and in supporting biodiversity. It is also important to note that new trees should be planted with consideration for pedestrians, and not be planted where they will create obstacles. Finally, we would like to add the importance of gaining greater investment and more council support for community tree planting schemes, and for maintenance (including by local residents) – there is no point if what is planted is not looked after.
- **Crossings.** Any network of active travel must take more account of the need for a lot more and better crossings for pedestrians – zebras and signal-controlled crossings. Recent research



shows how simple, cheap, effective zebras can be installed quickly and easily on side roads<sup>16</sup>. Pedestrian guard rails need to be removed on all crossings to avoid dangerous overcrowding at popular crossings and difficulties for people with disabilities, especially in wheelchairs. And crossings need to be direct, rather than staggered or dog-leg.

- **School Streets.** The LCWIP states that the location of education facilities (at all stages) was one of the criteria for identifying the areas that would benefit most from walking improvements, although there doesn't seem to be a direct correlation. It would be more useful to suggest that there is a presumption that every primary and secondary school should have a School Street scheme to protect children from the road danger, pollution etc. of motor vehicles. Then to prioritise specific places where this starts.
- **Pavement cycling.** It is illegal to cycle on the pavement, unless it is a designated shared space. However, it is often unclear to cyclists and pedestrians what is shared space and what is not. The principle of segregated space is recognised in the LCWIP and it needs to be recognised as a priority to take designated cycle routes off pavements and find safe alternative routes for cycling. This needs to be another criterion for identifying priority routes for cycling and walking.
- **Walking times on signs.** We welcome the mention of wayfinding for active travel. Many people visiting – and living in – Brighton and Hove overestimate how long it takes to walk anywhere. We would therefore like to see specific inclusion of signage for pedestrians which match the very useful signage for cyclists in showing how long it will take to reach a destination (e.g. seafront in 10 minutes; with a walking logo).
- **Other priority routes and areas.** Three specific areas could be added and/or increased in priority for action to improve the environment for walking:
  - **The seafront** – especially Marine Parade and between Palace Pier and West Pier. There are significant problems and conflicts here between drivers, cyclists and pedestrians that need to be tackled urgently. This location is a perfect demonstration of the need for solutions which serve pedestrians and cyclists together.
  - **Wilson Avenue**, which separates one of the most disadvantaged areas of Brighton and Hove from nearby green spaces and recreational facilities. This has been identified as a priority route for cycling but not for walking. It needs immediate attention. For example:
    - Many more safe and easy crossings for pedestrians. There are several access points for walking into Sheepcote Valley, and bus stops, which are regularly used by local people. But there are no crossings between the top and the bottom of Wilson Avenue, so people mostly cross this dangerous and busy road with no protection.
    - Lower speed limits, especially in view of the increasing volumes of traffic (including HGVs) in recent years. This would reduce road danger as well as air and noise pollution for local residents.
    - The footpath on the west side at the top of Wilson Avenue is too narrow for a wheelchair or buggy. It needs to be wider.
    - Car parking on grass verges and onto footpaths is creating more danger for pedestrians.

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<sup>16</sup> <https://www.livingstreets.org.uk/news-and-blog/press-media/83-of-adults-would-feel-more-confident-crossing-the-road-with-zebra-markings>.



Local people know these problems well and what is needed, so it makes practical, financial and political sense to involve them as early and deeply as possible in finding solutions and getting any changes right first time.

- **The Marina**, which is simply terrible for pedestrians and often overlooked.

Thank you for this further opportunity to comment on the draft LCWIP, and we look forward to further discussions over the coming months.

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