



Brighton & Hove City Council Low Traffic Neighbourhoods Policy and Strategy

Submission from Living Streets Brighton and Hove¹

We welcome the opportunity to contribute to the development of Brighton & Hove City Council's Low Traffic Neighbourhoods (LTNs) Policy and Strategy, which was presented to stakeholders at a special meeting of the Active and Inclusive Travel Forum on 14 February 2022.

We welcome the continued effort from Brighton and Hove City Council (BHCC) to tackle the traffic and transport issues facing the city, and the recognition from BHCC that a community-led approach can be of value. We also fully support measures to encourage more walking and cycling in the city, especially measures to make active travel safer, easier and more attractive.

However, we have reservations about both the principles and practical delivery of the policy and strategy being proposed on LTNs, especially in relation to improving streets for walking and wheeling.

We would value the opportunity to discuss the issues raised below in more detail as the policy and strategy are developed further, prior to the presentation of the policy to the ETS Committee in June 2022.

This note is divided into three sections:

1. The concept of LTNs as a way of increasing safer walking and cycling
2. The way the LTNs will be identified
3. The proposals for community engagement

Overall, we are concerned that LTNs may create significant opposition and division by restricting traffic in certain neighbourhoods without offering feasible alternatives to car use, potentially creating conflict and division within and beyond local communities, and with limited benefits for walking and cycling.

We therefore question whether LTNs are the best option for improving walking and wheeling in Brighton and Hove. There may be other ways of achieving the goals sought that are easier, cheaper and quicker.

¹ Living Streets Brighton and Hove is part of Living Streets, the UK-wide charity for everyday walking. We support the development of safer, cleaner, greener streets and neighbourhoods that create a better walking environment and inspire people to walk more. See our Brighton and Hove local group webpage <https://www.livingstreets.org.uk/get-involved/local-groups/brighton-and-hove>.

1. The concept of LTNs

We recognise that there is national UK Government funding available for LTNs and that this is an important consideration in difficult financial times for local government. We also understand that some communities are calling for LTNs as a potential route for funding the improvements they desperately need to improve safety in their neighbourhoods and it may be that LTN funding can be used flexibly so that alternative approaches to full LTNs can be explored.

LTNs clearly work in some local circumstances but we question whether they are necessarily appropriate as a major strategy for Brighton and Hove. Even re-naming them Liveable Neighbourhoods (as BHCC proposes) does not solve the problems they can create.

We have three main concerns about the concept of LTNs generally (covered in detail below):

- a) LTNs are essentially a *negative* approach (*stopping* something) rather than a *positive* development (*starting* something)
 - b) They can have significant negative impacts (especially on people with disabilities) and their perceived positive impacts can be quite limited
 - c) They are not necessarily the best way to meet the goals they are intended to meet.
- a) **A negative approach.** LTNs work by *restricting* motor vehicles in a specific area rather than being a *positive development* to improve neighbourhoods and reduce motor vehicle journeys. The recent report *Walking for Everyone*² instead recommends developing 20 Minute Neighbourhoods, which aim to support health and wellbeing by improving access to local services and facilities without the need for a car journey, alongside approaches which invest in making public transport cheaper and easier to use. These positive approaches may work better to divert journeys from car use by tackling car dependency more directly.

Recent social research by NatCen (2021) shows that while local residents in existing LTNs were keen to reduce traffic because of air pollution, the climate crisis and creating a clean and peaceful neighbourhood, they felt the theory of LTNs did not match the reality and questioned whether LTNs were the right way to achieve the intended goals. Many people even within LTNs did not understand what they are or why they were introduced.³

In LTNs, the restrictions on car driving worry car drivers and even people who do not drive related strongly to the concerns of those who do⁴. The challenge with LTNs is that they require physical changes to streets which can be seen as stopping something that people are used to, which can challenge people's perceptions of their rights and freedoms, which they may defend vociferously. Evidence from behavioural economics suggests that if something is taken away there will be opposition unless something much better replaces it. It may be that the social (especially health) and economic improvements offered by alternative schemes such as 20 Minute Neighbourhoods could be more readily accepted.

- b) **Potential negative and limited positive impacts.** LTNs can create particular problems for people with disabilities. Research in 2021 by disability organisation Transport for All with disabled participants from 19 of the 21 London LTNs showed that:

² *Walking for Everyone. Making walking and wheeling more inclusive.* Living Streets, Sustrans, Arup. March 2022. <https://www.livingstreets.org.uk/policy-and-resources/our-policy/walking-for-everyone>, pages 63-64

³ *Low Traffic Neighbourhoods. Research Report.* NatCen, London. December 2021. <https://www.natcen.ac.uk/our-research/research/low-traffic-neighbourhoods-research-report>

⁴ *ibid*, p2

- **Participants with disabilities reported benefits** of living in LTNs including easier or more pleasant journeys, an increase in independence, a decrease in traffic danger and benefits to physical and mental health.
- **However, 83% felt strongly impacted by their LTN and 77% reported an increase in journey times for residents and their carers** which “leads to travel becoming more exhausting, expensive, complicated or difficult. There were also cases of a negative impact on mental health, issues with taxis and a perceived rise in traffic danger”⁵.

Our discussions with a group working with blind and partially sighted people raised similar issues as well as identifying particular dangers for them if the streetscape changes, which causes problems for them by making it harder to orientate themselves and navigate. They would prefer improvements that did not make these sorts of physical changes to streets.

The specific needs of blind, partially sighted and other disabled people must be taken fully into account in the designs of any changes to streets. This requires that any consultation must ensure their active involvement and that their particular concerns are listened to and responded to.

Feedback from the 2021 Department for Transport survey of residents in existing LTNs⁶ suggests that the perceived impacts from the changes were not actually very positive, including:

- under half the people with mobility problems (49%) supported the LTN in their local area
- only one third (34%) said they had noticed fewer cars driving through their neighbourhood
- 43% agreed that the LTN made living in their neighbourhood more pleasant but 39% disagreed
- only 31% said the LTN helps create a sense of community in their local neighbourhood, and 48% disagreed.

Research shows that the views that people hold particularly strongly views on LTNs, whether they are for or against LTNs and within and beyond the communities chosen. For example, the Transport for All research found that “On both sides of the argument participants noted the negative impact the LTN debate has had on local communities, personal relationships and mental wellbeing”⁷.

There are also increasingly apparent political consequences of LTNs, with the negative impacts of LTNs becoming issues in local elections⁸.

NatCen’s research found that the recommendations for future LTNs **from people who live in them** included that restrictions to driving should be balanced with measures to make the alternatives cheaper and easier to use⁹, rather than changing well-known street spaces that people are used to with seemingly few new benefits.

⁵ *Pave the Way. The impact of Low Traffic Neighbourhoods (LTNs) on disabled people, and the future of accessible Active Travel.* January 2021, p4. <https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/>

⁶ *Low Traffic Neighbourhoods Residents’ Survey. Report.* Kantar for Department for Transport, January 2021, p12-13. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004948/low-traffic-neighbourhoods-residents-survey.pdf

⁷ See footnote 6, p 21

⁸ ‘Low Traffic, High Controversy’ by Peter Walker in *The Guardian*, 22 April 2022.

⁹ See footnote 4, p2

It is not unknown for unpopular LTNs to be removed. For example in West Ealing-South, 82% of local people said they did not want the LTN to be made permanent after a six-month trial¹⁰. The Transport for All report does not go that far, concluding that “ripping them out and returning to normal isn’t the solution. ‘Normal’ – what we had before – wasn’t accessible enough either”¹¹. That is not exactly a ringing endorsement.

Overall, there seems to be a delicate balance between perceived benefits and disadvantages, with possibly quite limited improvements to quality of life locally given the time, cost and controversy caused by LTNs.

- c) **LTNs are not necessarily the best approach to meet the goals.** Overall, the consensus from the research and our local discussions seems to be that while there may be some benefits from LTNs, they are not necessarily the only or the right way to achieve the intended goals in all circumstances. It may be more effective in terms of those goals, as well as being more cost effective and less divisive, to find other solutions.

At the moment, LTNs could be seen as a solution (driven by potential funding) in search of a problem. For walking and wheeling particularly, the value of LTNs is increasingly challenged, including that they do not create the infrastructure needed for walking and wheeling¹².

Living Streets B & H has been arguing for some time, and the point is stressed in *Walking for Everyone*:

“Improving walking and wheeling is often about making lots of relatively small changes to improve what’s already in place and make it more inclusive, in effect ‘We don’t need much but we need it everywhere’. This is very different to a more traditional transport scheme that tends to be a single large intervention”¹³.

Large scale projects, like LTNs, will only ever reach a relatively small number of areas and leave widespread problems untouched.

There is no reason why lots of small changes cannot be radical and transformative:

In Manchester, the Beelines project: “packaged the myriad of small improvements required to improve walking turning them into an ambitious large-scale programme that has the potential to be transformative. The programme was successful in generating significant funding for walking and cycling”¹⁴.

Small improvements can and should be celebrated – with openings and ribbon cutting and publicity – which help everyone understand how and why such improvements have happened and build support for more.

At the same time as improvements to pavements, removing obstructions, reducing traffic speeds etc. are tackled, it is vital that new problems for walking and wheeling are not created. At the very least, we suggest that new signage, EV charging points, bike hangars, bike hubs, the new BT hubs etc. should not be placed in the middle of pavements.

¹⁰ ‘LTNs and Lefebvre’ by Robin Hickman, *Town and Country Planning*, Nov/Dec 2021 p368.

¹¹ See footnote 6, p4

¹² See footnote 2, p52

¹³ See footnote 2, p52

¹⁴ See footnote 2, p54

The Draft BHCC Policy and Strategy outlines nine Draft LTN goals / objectives:

- Safeguard access for residents and the needs of mobility impaired people
- Create inclusive accessible spaces is a key priority
- Support active modes of travel and public transport, through the provision of safe and comfortable routes
- Reduce the impact of 'rat-running' vehicles through unsuitable residential roads
- Maximise local community input into the planning design monitoring and maintenance planning process
- Improve air quality and respond to the climate emergency
- Improve public realm and quality of life – Create better places for residents, businesses and visitors
- Create neighbourhoods in line with the council's Health and Wellbeing Strategy and Community Wealth Building Strategy
- Accommodate EV infrastructure – with best practice for disability access.

We would suggest that none of these objectives specifically requires the creation of an LTN. They could all be met, and are already being addressed, through the other active travel policies and strategies being developed in Brighton and Hove including the agreed Local Cycling and Walking Infrastructure Plan (LCWIP) and the draft Local Transport Plan (LTP5). Indeed, the objectives of access, especially inclusive accessibility, could be seen to be undermined by some LTN-type measures.

In addition these draft objectives are as much about dealing with the shortcomings of LTNs as improving local neighbourhoods (e.g. 'Safeguard access for residents').

If an LTN strategy is to be pursued, it may make more sense to draw on existing plans (especially the LCWIP and LTP5) to focus on geographical areas already identified as priorities for improvement based on objective data.

It would also be useful to set clearer positive objectives for what will be achieved in neighbourhoods against which progress can be measured. For example, measurable objectives for LTNs could include:

- reduce disincentives for walking and cycling e.g. controlling traffic speeds, creating more and better pedestrian crossings, tackling dangerous driving, heavy traffic and poor walking and wheeling infrastructure
- reduce car dependency by tackling poor transport provision and access to essential services especially in disadvantaged neighbourhoods
- reduce rat running
- reduce pollution
- improve access for residents and disabled people
- reduce fear of motor traffic
- increase resident satisfaction with their neighbourhoods
- support community development, community engagement and cohesion
- reduce loneliness and isolation.

2. How LTNs are identified

The draft BHCC LTN policy and strategy suggests that LTN areas will be identified as the result of bids from local communities. Council officers will then prioritise those bids against a series of criteria and through an assessment process.

In principle, we support improvements to walking and cycling being community-led and we welcome the proposal for a community engagement strategy. However, there are four reasons why we suggest the proposed approach may not be appropriate for choosing LTNs in the city:

- a) Fairness
 - b) Assumptions about community support
 - c) Decision making
 - d) Coherence with other major plans and strategies locally.
- a) **Fairness.** Relying on bids from local communities could be both divisive and inequitable. Communities with less capacity to bid (less time, transport expertise or with other priorities, especially in a cost of living crisis) are far less likely to bid, in spite of these areas potentially being those in greatest need of the improvements that LTNs are intended to bring.
- b) **Assumptions about community support.** Even if a bid is made in the name of a community group or local councillor, that does not necessarily mean that the majority of local residents support that bid, or the idea of an LTN at all. It is expecting a lot from a small local community group to ask them to test out local support for the idea of an LTN. It will require a lot of time, work and expertise to do such consultation, which is taken for granted in the proposed approach and which could again result in the poorest communities with the worst living environments being excluded from the improvements being offered.
- c) **Decision making.** The proposal is only for initial bids to be community-led. Those will then be subjected to appraisal by council officers, which may or may not result in an LTN being established. Council officers therefore retain control of the decision-making process. That is not a problem in itself but does undermine the idea that the scheme is community-led.

In addition, the bidding process is likely to raise expectations and, if the bid is unsuccessful, risk disappointment, disenchantment and disempowerment in local communities who will have been required to spend a lot of time and effort making a bid only to potentially fail to achieve success. Given the very limited resources that are likely to be available for LTNs in the city, and therefore the small number that are likely to be established, that could result in a great deal of raised expectation and disappointment.

This approach is also unlikely either to reduce council officer time (one of the objectives of the draft strategy) or reduce conflict or increase community engagement. There is also a risk is that there will still be a sense locally of a solution (LTN) being imposed.

- d) **Coherence with other plans and strategies in the city.** The draft policy and strategy for LTNs does not seem to be rooted in the existing plans, strategies and priorities for traffic and transport in the city. BHCC is already committed to priority walking zones within the agreed LCWIP and the draft LTP5 has clear principles and objectives. The LCWIP is designed to be an evolving policy that can respond to new demands and circumstances so should be able to respond to changing local needs. There are also proposals around for 20 Minute Neighbourhoods, 20 mph zones, Mini-Hollands, Clean Air Zones, an Ultra Low Emission Zone and Quiet Ways.

We recognise that all these different initiatives and plans are related to potential funding, and funding is obviously a key concern in improving transport in the city. However, the practical value of that funding may be affected by how flexibly it can be used. It will be important not to be tied to specific initiatives that could risk genuine long term problems for local residents.

Rather than taking a community-led approach in the case of LTNs, BHCC could take account of *Walking for Everyone* which proposes that local transport authorities should:

“Prioritise improvement schemes where the provision of local services and public transport is poorer, especially where this coincides with multiple deprivation”¹⁵.

This approach could also allow for all the other plans and initiatives in the city to be taken into account within this wider goal, alongside a well-resourced engagement programme.

¹⁵ See footnote 2, p50

3. Community engagement.

We welcome the proposal in the draft LTN Strategy for a community engagement strategy to be developed. However, we do have concerns about the depth and extent of any community engagement strategy given the draft outline of the appraisal and approval process for LTNs and likely available resources.

We suggest that a new approach to transport initiatives in the city could focus on the 3 Es: Engage, Experiment, Enhance. This would get away from the traditional and much higher risk DAD approach – Decide, Announce, Defend. In this way, community engagement is built into a process of testing out options for improvements with less opposition and conflict.

The 2021 NatCen research (commissioned by the European Climate Foundation) worked with local residents in LTNs to identify the essential elements of any LTN strategy in future. Their 10 conclusions were (directly quoted):

1. Local authorities to engage with LTN residents, boundary residents and businesses from the very start, and provide relevant information.
2. Any consultation or resident engagement to be on an ongoing basis and ensure that it is inclusive and accessible to all e.g. take account of low literacy in English or digital exclusion.
3. A credible rationale for LTNs including an explanation of why they are needed in a particular area and the likely benefits e.g. any evidence for the reduction of traffic and improvement in air quality.
4. Local authorities to provide a map of all the LTNs across their borough and neighbouring boroughs to help residents navigate them effectively. In addition to this, the introduction of LTNs (and any changes to them) to be updated on sat-nav systems.
5. LTNs and any new measures to be introduced gradually and include a “grace period” to allow residents time to understand and adjust to new measures, e.g. issuing a warning and not a fine on the first one or two incidents of breaching an LTN.
6. Exemptions and resident passes to be available for those who need exemptions under the right conditions e.g. Blue Badge holders.
7. Signage and traffic cameras to be clearly visible so that they cannot be missed.
8. Barriers and planters to be more flexible to allow access for key groups such as emergency services.
9. Incentivising people to walk by introducing better street lighting, and to cycle by making roads safer and providing more secure on street bike storage.
10. Better communications around cycling and walking options within LTNs as well as improved public transport services that are more frequent, comfortable, accessible and affordable.

We have quoted these conclusions in full because they demonstrate the scale of work required for an LTN to be successful from the perspective of local residents. They may provide a useful starting framework for any policy and strategy for LTNs, including in Brighton and Hove.

We suggest that any community engagement strategy would need to include:

- **A significant budget specifically for community engagement** allocated up front for every potential initiative. This engagement budget should be explicit in any external funding bid to demonstrate both the priority given to community support and to ensure that sufficient resources are available to do it properly.

- **A major communications strategy** to demonstrate how LTNs sit within the wider traffic and transport (and other) plans for the city, and which initiatives are likely to happen where.
- **Very early and extensive dialogue with local residents**, community groups, businesses and other local interests, with special efforts made to involve those who may otherwise be excluded (e.g. disabled people including blind and partially sighted people who may not be able to respond to online and other conventional consultation methods, as well as children and the digitally excluded).
- **A mini-citizens' assembly** or similar set up for each neighbourhood affected, based on the methods of recruitment (e.g. randomly selected and adjusted for demographic representation), design, delivery and reporting of the BHCC Climate Assembly. This would need to be established as soon as it was agreed that an LTN or similar may be set up, and it should run until after the LTN is fully established.

The work of the assembly may need to be supplemented with additional communications activities to ensure that the deliberations of the assembly are **open to input from as wide a range of participants as possible** as the initiative progresses.

The majority of the assembly's work may be in the early stages of the development of the LTN (design and implementation), but it should continue after the implementation phase to advise on and oversee monitoring outcomes.

- **Some sort of permanent group** for the neighbourhood could be set up to continue the work of the citizens' assembly with a brief to review and suggest any necessary changes and improvements to the LTN in the longer term, or that responsibility could be passed to another existing community or neighbourhood group.

Properly constituted mini-citizens' assemblies operating openly and transparently are more likely to be able to build the trust and credibility needed to design and develop the most appropriate local improvements, monitor the development and delivery of the LTN, understand what is working and what needs to change, and support community engagement throughout.

Good engagement could:

- enable better improvement schemes to be created
- create advocates among ordinary people for better designed and managed neighbourhoods
- help ensure better integration of traffic and transport measures with social (especially health) and economic regeneration
- help build trust between the council and local people, and
- reduce the likelihood of unexpected opposition and increase chances of finding consensus solutions.

This is not a cheap option but in terms of risk management and effectiveness such a method could enable an LTN to be developed and implemented in a way that reduces the chances of the conflicts and difficulties arising that have faced LTNs elsewhere. If successful, it could potentially be seen as a model that may be of interest to others elsewhere in the UK.

We would be very pleased to be involved in further stages of the development of any LTN policy and strategy to support such an outcome.

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