



Draft Local Transport Plan 5 – Response from Living Streets Brighton and Hove

We welcome the opportunity to contribute to the development of Brighton & Hove City Council's Local Transport Plan 5 (LTP5). and are grateful for the opportunities to discuss the early thinking on the plan in stakeholder workshops.

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. We have therefore commented almost exclusively on issues for walking (which we always mean to include 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.

We warmly welcome the general principles of LTP5 – improving our quality of life and a more liveable city in which residents are healthier, safer and more connected, while reducing emissions in the move towards the city becoming carbon neutral. There is a lot to like and admire in the plan especially in the range of existing initiatives (and the recognition that quite often these are non-council groups) and proposed innovations that could improve walking in the city.

However, there is insufficient focus on tackling the existing everyday problems which currently reduce people's willingness and ability to walk more. We therefore suggest three new priorities:

- 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 key 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

There is a brief mention of 'enforcement' of vehicle speed limits (p36), which is welcome, but nothing about reducing speed limits. There is no recognition of the part played by motor vehicle speeds not only in causing accidents (which seem to be seen as the responsibility of people 'not

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

looking properly', p13), but in discouraging people from walking at all. The Vision Zero approach to reducing fatalities and severe injuries to zero is welcome but not sufficient.

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 the central London Congestion Charging Zone² 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 streets³.

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"⁴.

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 recommends is taken into account in setting an appropriate speed limit is existing traffic speeds⁵. 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 18.2mph⁶. 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. DfT guidance states⁷: "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."

² <https://tfl.gov.uk/corporate/safety-and-security/road-safety/safe-speeds>.

³ *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

⁴ 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>

⁵ <https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits>. Department for Transport, 2013, p29

⁶ <https://www.theargus.co.uk/news/19135528.covid-motorists-speeds-brighton-hove-main-roads/>

⁷ <https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits>. Department for Transport, 2013

- **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 health⁸. Reduced traffic speeds can also contribute to improving air quality; contrary to current myths, slower traffic does not increase air pollution or reduce air quality⁹.
- **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 effective¹⁰.

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, for buses and taxis as well as private vehicles. This should be seen as an integral part of the LTP5 strategic approach because it impacts so many of the other elements of the plan. For example, LTP5 identifies the benefits of 20 Minute Neighbourhoods and Low Traffic Neighbourhoods, and recognises that fear of road danger is an issue (p13): “Fear of traffic can affect people’s quality of life ... Speed management strategies should seek to protect local community life” but goes no further in terms of reducing speeds.

The need for a city-wide 20mph speed limit (or indeed any speed reduction) is not shown anywhere in the draft LTP5 and is a major omission that must be addressed.

Removing obstacles to safe walking

The various innovations to support more walking are welcome: the proposals for Improved walking routes, more wayfinding signs and information, more pedestrian priority areas, greening and the liveable city centre, low traffic neighbourhoods, school streets etc.

However, nowhere in the draft LTP5 is there any mention of the physical hazards pedestrians face every day throughout the city: such as pedestrian guard railings, wheelie bins on the pavement, communal bins blocking crossing points and sight lines for pedestrians of oncoming traffic, inappropriate signage – almost always for motor vehicles - which blocks pavements, traffic signal control boxes and now new electric vehicle fast charging boxes and associated signage. We also need to tackle pavement parking and pollution which are additional physical obstacles.

A very obvious priority is removing pedestrian guard railings. There are pedestrian barriers all over the city, at road crossings and elsewhere (often with no apparent reason). There is now clear evidence that removing pedestrian barriers significantly reduces collisions: a fall of 56% in pedestrians being killed or severely injured (KSI) and a fall of 48% in the number of all KSI

⁸ 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>

⁹ *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.

¹⁰ *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

collisions¹¹. It would make a major contribution to creating safe and welcoming streets to remove all pedestrian barriers across the city as a priority. This would be a very simple and visible change that would show residents and visitors alike that the city welcomes people walking.

All obstructions on pavements are dangerous and discourage people from walking – people are so often forced off the pavement into the road simply because the pavement has become so narrow it is impossible to navigate.

We all recognise that it is part of the character of much of the centre of the city that we have narrow streets with narrow pavements, and that is part of the charm and attractiveness of the city. But the impact of these features of our urban fabric have to be taken into account in planning for the future of travel and transport, to make it safer to walk around.

The lack of any strategy to tackle these obstacles for people walking – especially those in wheelchairs, pushing buggies, children, those who have disabilities and/or visual impairment, or are just elderly and more anxious about falling and more likely to be seriously injured in a fall – is simply no longer acceptable in our city.

Even worse is when new schemes (such as the EV charger roll out) are making the situation worse by not considering the impact on reducing pavement widths and the danger for people walking.

A less obvious but equally important obstacle to people walking more is air quality and pollution (we have already mentioned noise pollution above). We support the introduction of an Ultra Low Emission Zone across a wider area than at present, and a Clean Air Zone in the city (p34) as well as significantly more (and more accessible) data on air pollution.

However, this is not just about reducing carbon emissions from motor vehicles to tackle climate change but also about creating a safe environment for walking. It could be mentioned as part of the thinking around “A healthier and safer city” (p13). For anyone elderly, with certain health conditions, pregnant, children etc., this is a fundamental barrier. People don’t want to walk along noisy, dirty, polluted streets choked with traffic and related fumes. No amount of nice wayfinding signs will overcome this. It needs much stronger measures.

It would also be good to link the planting of more trees as a practical approach to managing air quality and tackling climate change, and supporting biodiversity, as well as creating more attractive streets for walking.

The draft LTP5 mentions the plans for various behaviour change campaigns (p36-38). However, one of the first principles of behaviour change is to remove obstacles to the behaviour being sought. We very much hope that removing such obvious physical obstacles to walking on our streets will be addressed in future drafts of the plan.

Increasing investment in enforcement, monitoring and engagement,

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

¹¹ *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.

Brighton & Hove City Council has often been very proactive and successful in engaging local citizens. The stakeholder engagement on LTP5, and other transport developments, is often exemplary. The Climate Assembly on transport took local engagement to a welcome new level and it is good to see that the draft LTP5 has taken the Assembly's recommendations into account.

One of the ten key recommendations of the Climate Assembly not mentioned in the draft LTP5 was that "The council should actively consult and engage with the community"¹². It is important to understand that better engagement requires not just warm words but greater investment of time, money and expertise.

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 not¹³.

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.

¹² <https://www.brighton-hove.gov.uk/brighton-hove-climate-assembly>

¹³ *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

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

LTP5 offers some obvious opportunities for innovation in 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 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.

Engagement also offers opportunities to tackle some of the other problems identified in LTP5, such as data collection. 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.

Engagement and enforcement are examples of very basic activities that could underpin and reinforce so much else that is good in this draft of LTP5, and offers relatively inexpensive ways to embed change in sustainable ways. 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 three key principles of LTP5.** We suggest that the first of these (p23) is amended from "Reduce the need to travel" to "Reduce the need to drive". We don't want to stop people moving around the city; we just want them to drive less.

We strongly support the creation of 20 minute neighbourhoods (p23), which offer opportunities to help build communities with more facilities locally. As above, these also provide an excellent opportunity to engage positively with local communities.

- **Priority areas and interventions.** Rather than "Develop streets and places that encourage and enable active travel" (p31), we'd like to see this also cover "Remove the obstacles that prevent active travel, and introduce measures to support more walking and cycling".

We'd suggest that the priority should be for streets to be "safe, healthy and attractive" (rather than "attractive, safe and healthy"). The priority really needs to be safety. Valley Gardens is a wonderful example of how this can work and we strongly support the Valley Gardens scheme, and the proposals for Phase 3. At the same time, we just really need some of the basic problems identified in our three priorities above to be tackled at the same time.

- **School streets.** We welcome the inclusion of School Streets (p32) and would like 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. We

recognise that these cannot all be done at the same time but as an aspiration it seems a sensible goal for all the reasons you give.

- **Proposed interventions.** We would like the interventions proposed for streets (p36) to be changed to reflect the three priority areas we have identified earlier: city-wide 20mph, removing obstacles and increasing enforcement and engagement.

We very much welcome more pedestrian priority areas, greening especially tree planting, stopping rat running and more School Streets, 20 minute neighbourhood developments and – especially your final point: “Enforcement of vehicle speed limits, pavement parking, street works and moving traffic offences”. We would make that the first and most important point in this set of interventions.

Thank you for this further opportunity to contribute to the development of LTP5, and we look forward to taking part in developing future drafts.

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