

# Transport & Sustainability Committee

Date: **3 October 2023**

Time: **4.00pm**

Venue: **Council Chamber, Hove Town Hall**

Members: **Councillors:** Muten (Chair), Wilkinson (Deputy Chair), Davis (Opposition Spokesperson), Asaduzzaman, Bagaeen, Galvin, Loughran, Miller, Pumm and Robinson

Contact: **John Peel**  
Democratic Services Officer  
01273 291058  
[john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)

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Date of Publication - Monday, 25 September 2023

# AGENDA

Part One

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## PROCEDURAL MATTERS

### 20 PROCEDURAL BUSINESS

- (a) **Declarations of Substitutes:** Where councillors are unable to attend a meeting, a substitute Member from the same political group may attend, speak and vote in their place for that meeting.
- (b) **Declarations of Interest:**
  - (a) Disclosable pecuniary interests;
  - (b) Any other interests required to be registered under the local code;
  - (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

- (c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

*Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public. A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and on-line in the Constitution at part 7.1.*

### 21 MINUTES

9 - 26

To consider the minutes of the meeting held on 6 July 2023.

Contact Officer: John Peel

Tel: 01273 291058

### 22 CHAIRS COMMUNICATIONS

## 23 CALL OVER

- (a) Items 27 – 35 will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) Those items not reserved will be taken as having been received and the reports' recommendations agreed.

## 24 PUBLIC INVOLVEMENT

27 - 28

To consider the following matters raised by members of the public:

- (a) **Petitions:** To receive any petitions presented by members of the public;
- (b) **Written Questions:** To receive any questions submitted by the due date of 12 noon on the 27 September 2023;
- (c) **Deputations:** To receive any deputations submitted by the due date of 12 noon on the 27 September 2023.

## 25 ITEMS REFERRED FROM COUNCIL

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To consider items referred from the last meeting of Full Council held on 20 July 2023

## 26 MEMBER INVOLVEMENT

31 - 32

To consider the following matters raised by Members:

- (d) **Petitions:** To receive any petitions;
- (e) **Written Questions:** To consider any written questions;
- (f) **Letters:** To consider any letters;
- (g) **Notices of Motion:** to consider any Notices of Motion referred from Full Council or submitted directly to the Committee.

## 27 CARBON NEUTRAL 2030 PROGRAMME - ANNUAL REPORT

33 - 74

Report of the Executive Director, Economy, Environment & Culture

*Contact Officer:* Kirsten Firth

*Ward Affected:* All Wards

## 28 HANOVER & TARNER LIVEABLE NEIGHBOURHOOD

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Report of the Executive Director, Economy, Environment & Culture

*Contact Officer:* Andrew Renaut

*Tel:* 01273 292477

*Ward Affected:* Hanover & Elm Grove; Queen's Park

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<b>31</b>	<b>PARKING SCHEME UPDATE REPORT</b>	<b>181 - 206</b>
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	<i>Contact Officer:</i> Russell McMillan	<i>Tel: 01273292387</i>
	<i>Ward Affected:</i> West Hill & North Laine	



## **36 ITEMS REFERRED FOR FULL COUNCIL**

To consider items to be submitted to the 19 October Council meeting for information.

*In accordance with Procedure Rule 24.3a, the Committee may determine that any item is to be included in its report to Council. In addition, any Group may specify one further item to be included by notifying the Chief Executive no later than 10am on the eighth working day before the Council meeting at which the report is to be made, or if the Committee meeting take place after this deadline, immediately at the conclusion of the Committee meeting*

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### **Further information**

For further details and general enquiries about this meeting contact John Peel, (01273 291058, email [john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)) or email [democratic.services@brighton-hove.gov.uk](mailto:democratic.services@brighton-hove.gov.uk)

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**Brighton & Hove City Council**  
**Transport & Sustainability Committee**

**4.00pm 6 July 2023**

**Council Chamber, Hove Town Hall**

**Minutes**

**Present:** Councillor Muten (Chair) Wilkinson (Deputy Chair), Davis (Opposition Spokesperson), Asaduzzaman, Bagaeen, Galvin, Loughran, Miller, Pumm and Robinson

**Part One**

**7 PROCEDURAL BUSINESS**

**7(a) Declarations of substitutes**

7.1 There were none.

**7(b) Declarations of interest**

7.2 There were none.

**7(c) Exclusion of press and public**

7.3 In accordance with section 100A of the Local Government Act 1972 ("the Act"), the Committee considered whether the press and public should be excluded from the meeting during an item of business on the grounds that it was likely, in view of the business to be transacted or the nature of proceedings, that if members of the press and public were present during that item, there would be disclosure to them of confidential information (as defined in section 100A(3) of the Act) or exempt information (as defined in section 100(I) of the Act).

7.4 **Resolved-** That the press and public not be excluded.

**8 MINUTES**

8.1 **Resolved-** That the minutes of the previous meeting be approved as the correct record.

**9 CHAIRS COMMUNICATIONS**

9.1 The Chair provided the following communications:

"I wish to welcome all members and officers to the newly formed Transport and Sustainability Committee. The former administration's Environment, Transport and Sustainability Committee was not adequate in meeting the breadth and giving proper

attention to the full range of issues affecting our environment. Labour considers our environment as important, requiring two committees to ensure proper focus and scrutiny can be achieved through this committee and the City Environment, South Downs and the Sea Committee.

This committee convened on 21st June at short notice to address the need to review the A259 Fourth Avenue to Wharf Road Active Travel Scheme due to pressing contractual reasons. To remove any doubt, this was to enable a review to better the existing scheme and ensure what is delivered is safer and more accessible for active travellers and disability access along Hove seafront; with improvements for cyclists, walkers, disability access, public transport, emergency and support vehicles and those who need to travel by car or van along this busy Hove seafront route. I wish to thank this committee for supporting this review. Labour is fully committed to active travel and This decision illustrates our determination to deliver a higher standard active travel scheme, better than before. We should not deliver schemes knowing that improvements and amendments will be soon needed.

The electorate of Brighton and Hove made a clear unambiguous choice 2 months ago. This city has put its faith in a party that listens; a party with vision and a party that sets out to restore basic services and deliver sustainable travel for all its residents.

In this light, we recognise the need to ensure that the Valley Gardens Phase 3 scheme delivers for all. The crowded A23 – A259 intersection in front of Palace Pier needs to work for all constituencies with a focus on safety for all who use this junction – especially cyclists, walkers and disability access. The scheme needs to enhance public transport options to ensure throughflow of buses especially effective east – west movement between North Street and A259 east; to enable environmentally considerate routes for taxis and set out to minimise traffic congestion. There are many favourable aspects of the Valley Gardens Phase 3 plan - we need to ensure these are integral whilst being confident that what is delivered works as best practicable for all constituencies.

No transport scheme can be considered without reference to the wider transport strategy. This means a robust connected strategy for public transport, active travel, businesses and residents. This Labour administration is committed to delivering fair, equitable, accessible, low carbon sustainable integrated transport for our city that works for its residents, businesses and visitors. We recognise the urgency of the climate and biodiversity emergency in combination with the cost of living and fuel and housing crises. We must move away from regressive attitudes towards those who need to drive for work, to access services and connect communities across our city. Yes, we need to ensure public transport is accessible, affordable and meets the needs of our city and ensure active travel is attractive and safe encouraging more people to do so. Studies show that regressive “stick” approach without “carrot” encouragement are counter-productive and proven not to give the gains for active travel. Labour recognises that studies show a combined “carrot and stick” approach to active travel is the best way to ensure uptake. We listen to the experts when it comes to policy development. By implementing real choice for our city’s transport options, we plan to encourage more residents and visitors to chose active travel, bike share, public transport and low carbon options to move around our city. We have a plan to meet the immediate need and to develop our vision that works for the 2030s and beyond.

As we mark 10 years of UNESCO designation of Brighton's unique world recognised Biosphere; a new sustainable transport strategy that is inclusive and reflects the diversity of our amazing welcoming city is now needed. As Chair of the Transport and Sustainability Committee; I want show leadership in how we treat people. How we refer to each other. How we can respect each other as we choose to move around. As an administration, we want to give people genuine freedom of choice; encouraging and enabling positive environmental, affordable, low carbon, safe and accessible choices to travel safely around our amazing biosphere".

## **10 CALL OVER**

## **11 PUBLIC INVOLVEMENT**

### **(A) Petitions**

#### **1) Madeira Terrace Lift Bus Replacement Service**

11.1 The Committee considered a petition signed by 294 people requesting the operation of a shuttle bus service to Madeira Terrace whilst the lift was under maintenance.

11.2 The Chair provided the following response:

"Following requests from residents officers have explored the option of running a shuttle bus service on a loop between the top and bottom of the lift through the summer season while the Madeira Terrace lift is out of action. Unfortunately, the additional £80,000 cost of running this service is unbudgeted at a time when resources are already under pressure. Over the summer, Madeira Drive gets extremely busy with traffic and cars looking for parking spaces and manoeuvring into the bays often leads to congestion and delays. This would make any service and journey along Madeira Drive extremely slow and time-consuming.

Officers have also explored the option of a diversion to the existing 52 bus service and are awaiting a response to enquiries from The Big Lemon CIC who operate the service on our behalf, however officers think this option may be problematic as the current service runs at a relatively high cost per passenger and there is a risk that significant changes could further increase operating costs and put the service at risk. The service also uses electric buses which are at the limit of their operating battery range. The Council have also made recent improvements to the service to increase passenger numbers using Bus Service Improvement Plan funding and have publicised this extensively. It will take a while for these changes to bed in and further alterations could confuse passengers".

11.3 **Resolved-** That the Committee note the petition.

#### **(2) Stanmer Street access trial**

11.4 The petitioner deferred the petition.

#### **(3) Safe road crossing – Hove Cemetery / Old Shoreham Rd**

11.5 The Committee considered a petition signed by 501 people requesting a crossing on Old Shoreham Road near Hove Cemetery.

11.6 The Chair provided the following response:

“The Council receives many requests for transport infrastructure improvements across the city on a yearly basis.

To manage this demand, we have recently introduced a new assessment process called Safer Better Streets – highway infrastructure priority.

As part of this new process, requests will only be accepted via ward councillors. As your request was received via this route, by presenting your petition to the Transport and Sustainability Committee it will be included in the list for assessment.

Please note that due to the number of assessments needed from requests in previous years, requests received after 31 March 2023 may be referred to the 2024/5 financial year for assessment”.

11.7 **Resolved-** That the committee note the petition.

#### **(4) Gardner Street**

11.8 The Committee considered a petition signed by 32 people requesting the pedestrianisation of Gardner Street from 11am-5pm Monday to Sunday.

11.9 The Chair provided the following response:

“Thank you for your petition, The closure of Gardner Street to motorized vehicles in January followed a decision taken by the Environment, Transport and sustainability committee in November 2022.

This decision was taken after a full consultation regarding the Traffic Regulation Order had been carried out and engagement with stakeholders including businesses.

Businesses are allowed to use the full width of the footways outside their premises between 11am-5pm each day. This creates a welcoming 3m to 4m wide thoroughfare along the road for pedestrians. Officers have received several comments that the space is now more attractive to use.

Previous to the current closures, businesses were able to use the carriageway only when the road was closed at weekends. With the full width of the carriageway blocked by outside furniture the narrow pavements often became difficult to navigate, people with disabilities found the street difficult to use and would often avoid it at weekends.

As the current design (which is working well in other streets in the city) has only been active since January, Officers will continue to monitor the current Traffic regulation order and street layout with a view to reviewing the decision in the autumn”.

11.10 **Resolved-** That the Committee note the petition.

#### **(B) Public Questions**

##### **(1) Parking Cards**

11.11 Susan Gorman read the following question:



“Can residents and visitors buy a scratch card type pay to park card, to be used in pay to park bays? This will do away with the need for technology and can be purchased in advance and scratched off to show date, time, zone etc. This will be a more inclusive solution and can be used alongside the app and account system”.

11.12 The Chair provided the following reply:

“Scratch cards are not an available option for short term use in paid parking bays in Brighton and Hove. However, visitor parking permits for residents and their visitors within controlled parking zones are available to buy through the council website”.

## **(2) Bus Diversion**

11.13 Gregg McTaggart read the following question:

“I live on Montpelier Road and am amongst those most severely impacted by the Western Road bus diversions. In correspondence with the former and current Regency Ward councillors they talk of “considering the views of stakeholders”. There seem to me five primary stakeholders – residents on the diversion, other residents, B&H buses, RJ Dance and the Council. Please provide a list of stakeholder meetings held with each group since 9 January 2023, the date the diversion started”

11.14 The Chair provided the following reply:

“Thank you for your question. I have noted the disruption resulting from the current construction on Western Road and have raised this with officers.  
I am advised that, as the diversion is currently subject to a legal challenge, I am limited in what I can say in response at this stage; however, I do hope that buses will return to Western Road as soon as possible.  
I understand officers have met with a group of residents before and since the diversion was introduced which has resulted in some changes along the diversion route. We are keen that residents are kept informed of progress and I understand update newsletters have been distributed previously. We hope to provide a further update once the legal process allows”.

11.15 Gregg McTaggart asked the following supplementary question:

“What is the council doing to monitor the contractors performance?”

11.16 The Chair provided the following reply:

“We are working closely with the contractor, and we know they are working hard, at least six days a week. We are driving forward to deliver a two-way traffic as soon as possible”.

## **(3) Greenways**

11.17 Malcolm Spencer read the following question:

“I am a farmer in Ovingdean producing food that is eaten by residents in the city. For years, crops in one of my fields have been damaged by people who stay in their camper

vans on the road called Greenways and the problem is getting worse. Please could Greenways be designated a No Overnight Camping road or something else that is enforceable with fines?"

11.18 The Chair provided the following reply:

"I will take this issue back to officers to determine if there are any options that can be taken forward in terms of enforcement of the overnight parking on the Greenways and also more generally lived in vehicles in the vicinity"

#### **(4) Net Zero 2030**

11.19 Martin Gardner read the following question:

"Will the newly formed council stay true to the existing net zero by 2030 target, and if so what SMART (specific, measurable, achievable, realistic and time-bound) targets will be put in place with clear lines of designated responsibility for the implementation of these targets in order to rapidly reduce carbon emissions over the next 4 years?"

11.20 The Chair provided the following reply:

"Thank you for your question

Brighton & Hove City Council is resolutely committed to making Brighton & Hove a carbon neutral city by 2030.

The council has just one climate target – to become carbon neutral by 2030. This is an extremely ambitious SMART target, which measures our greenhouse gas emissions and sits across all the council's actions. It also involves collaboration with key partners in business, public sector organisations, and communities in the city.

This target is the responsibility of the Transport and Sustainability Committee, which will receive regular reports on progress on our action to reduce carbon emissions and adapt to our changing climate".

#### **(5) Climate Emergency**

11.21 Martin Gardener read the following question:

"Will the council seek to provide timely and transparent information to the public in public settings (i.e. beyond on the council's own website) on the declared climate emergency, co-develop more ambitious plans with the numerous willing local community groups and collaborate with these groups to implement its carbon reduction plan, and if not why not?"

11.22 The Chair provided the following reply:

"Thank you for your question. The answer is yes, and we are already actively looking for opportunities to connect with communities and partners – and explore how we can collaborate as well as share what the council is doing.

The council had a stand at the Sustainability Festival in Stanmer Park in May and we are looking at sharing a unit in the Open Market to provide information and face to face contact.

We will shortly be reviewing and reporting on our 2030 Carbon Neutral Programme and welcome suggestions on how people in the city would like to access this information. We report on progress annually, and we also report annually to the independent Carbon Disclosure Project.

We are establishing a working group with community volunteers and co-ordinators to help us better support the city in taking a more collaborative approach and use the best ways to communicate.

We want to bring together individuals and organisations with different skills, expertise, ideas and understanding of our diverse community, so we can co-develop and share the expertise of everyone in the city to support climate action.

Many actions which support people with the cost of living crisis, improve public health and provide a safer and better environment, are also climate actions, so the public's involvement will be crucial in designing solutions that work and benefit people.

We are currently reviewing the way we involve and consult with the public to enable a more strategic and co-ordinated approach across the council.

The council is directly responsible for just 1.7% of carbon emissions in the city. We recognise the council has a role in involving, communicating and bringing people together. Only by including the voices and diverse experiences of communities and businesses will we be able to scale up climate action, reduce the effects of climate change on people, and ensure everyone has a part to play in shaping future actions and projects".

## **(6) Carbon Reduction**

11.23 Martin Gardener read the following question:

"Has the council fully costed its carbon reduction plans, has funding for its plans been sourced and ringfenced, and will the annual Sustainability and Carbon Reduction Investment Fund (SCRIF) be spent on supporting the installation renewable energy in households struggling with the cost of living crisis or in support of persons/groups particularly vulnerable to climate change impacts, or if not what will it be spent on and why?"

11.24 The Chair provided the following reply:

"The council has not yet fully costed its carbon reduction plans. We are commissioning a study on decarbonisation pathways which will develop and cost several scenarios to achieve our 2030 carbon neutral city-wide target. This study will deliver findings and an action plan in early 2024, which will be reported to the Transport and Sustainability Committee.

Turning to the Sustainability and Carbon Reduction Investment Fund, this is now known as the Carbon Neutral Fund.

Since 2019, the Carbon Neutral Fund has invested over £21m in projects across the council supporting reduction in greenhouse gases, adapting to climate change, and enhancing our green spaces for biodiversity. At present, we are considering how the Carbon Neutral Fund may go forward in future years, and what kind of projects will be prioritised.

Helping residents to live in well-insulated, efficiently heated, healthy homes and addressing fuel poverty issues remains a key long-term objective, which is supported through the Housing Revenue Account capital programme. The current five-year

programme sets out resources of £30.113m; an average investment of £6.022m per annum. This includes investment in improvements to communal and domestic heating systems as well as identifying opportunities to install energy efficient & low carbon heating systems. We are also implementing a three-year solar PV programme, with currently allocated budget of £4.32M over the 3-year period.

Our award-winning new council housing development, at Victoria Road in Portslade, features high levels of insulation, solar panels and a ground source heat pump.

We participate in a range of programmes to improve energy efficiency and bring down fuel bills for residents struggling with the cost-of-living crisis. These include our participation in wider schemes with other local authorities such as the externally funded Warmer Homes Consortium to support low-income households to improve the energy efficiency of their homes. The Council has also participated in 3 rounds of the Solar Together Scheme, a Sussex wide 'group buying' scheme to support residents to install solar PV on their own homes.

The Council continuously reviews funding opportunities to secure more investment for climate action in our communities and economy. For example, the Strategy, Finance and City Regeneration Committee on 22 June 2023, approved a plan for £460,000 external funding for projects supporting green travel corridors and active travel in the Shoreham Harbour area, helping to create a cleaner, greener South Portslade".

## **(7) Aquarium Roundabout**

11.25 Adrian Hart read the following question:

"I'm aware of course that the final phase of the Valley Gardens revamp will not happen this year. However, it would be helpful if the new administration set the BHCC record straight on the following matter: In answer to questions put to ETS on June 21st and Sept 20th, the then chair/deputy seemed to suggest that the Aquarium roundabout was the most dangerous junction in the city. Will the new administration differ from the previous one on such an assertion?"

11.26 The Chair provided the following reply:

"Road Safety and collision reduction is key to providing a safer road network for all to use. We are aware that there are proportionally a large number of collisions at the Sealife Centre Roundabout. As part of the Valley Gardens Phase 3 review we will ensure that any proposals support a reduction in collisions and make this junction safer for all".

11.27 Adrian Hart asked the following supplementary question:

"Will the Chair agree to reexamine its calculations on the roundabouts danger and consider the consultants report warning that removing it would produce a significant increase in congestion, air pollution and damage to the local economy?"

11.28 The Chair provided the following reply:

"I set out in my communications at the start of the meeting that we are set out to review this junction as part of the Valley Gardens Phase 3 work to make sure it is delivering the option we can get for this. There has been a lot of work as you highlight to establish a

fair design for this. But we do need to check this to ensure it works for all constituencies. That includes safe access and crossings for cyclists and pedestrians but it is, as you say, a very busy traffic intersection between two major A roads on our seafront so there is a call and a reasonableness to undertake a review to make sure this junction works and it is made safer through that review before we begin to implement Phase 3”.

## **(8) Pedal People**

11.29 On behalf of the questioner, Councillor Davis read the following question:

“‘Pedal People’ use multi-seat trikes as mobility aids to enable health, wellbeing and equal access for all ages with disabilities and health challenges.

Accessible cycles are wider 3-wheelers, so suitable cycle lanes such as A259 and Valley Gardens extensions are long-awaited key additions to enable access and equality. 1 in 20 people in Brighton are disabled.

Both schemes included excellent increased provision for disabled parking, public transport and safer cycle routes for disabled people and the wider community, including carers.

Will you give us your commitment to reverting to the original, funded plan when these revisions return unfeasible?”

11.30 The Chair provided the following reply:

“This Council is fully committed to deliver its vision, to create a ‘Fairer city, a Sustainable Future’.

To achieve this vision, an inclusive accessible transport system is absolutely key. The Council’s very own City Transport’s Service Plan identifies the importance of inclusive design and infrastructure to improve access to all parts of the city and council services. Any revisions of the cycle lanes on the A259 or elsewhere in the city will be compliant with accessibility guidelines and will be subject to Equalities Impact Assessments”.

11.31 Councillor Davis asked the following supplementary question:

“Do you think that the new scheme will be as well consulted upon and will meet with all the stakeholders we met before and will still fit into the timeframe you’ve given for implementation?”

11.32 The Chair provided the following reply:

“The review of the existing scheme is to build upon the consultation to date which supports the case for an active travel scheme on Hove A259 and elsewhere in the city. The aim of the review is to improve and better the scheme as it stands to enhance that bi-directional cycle route and to avoid the particular re-routing of the eastbound cycle route”.

## **(9) School Streets**

11.33 Michael Letton read the following question:

“Given the number of active travel schemes that the current administration has paused for revision, would the committee support a revision of the Westdene school streets scheme given the large impact it is having on the community 7 days a week, 365 days a year?”

11.34 The Chair provided the following reply:

“The Westdene Primary School Streets scheme is currently in place under an Experimental Traffic Regulation Order (ETRO). ETROs act as statutory consultation periods in which schemes are monitored and changes can be made to live schemes. At present, this safety improvement scheme has received overwhelming support from members of the public, including residents and parents and carers and continues to be supported by the school.

A revision to the in-situ scheme is not currently considered to be required however this scheme will be presented to a future Transport and Sustainability Committee later this year, where Councillors will duly consider all feedback received from the ETRO process and decide whether to make the scheme permanent”.

## **(10) Cycle Lanes**

11.35 Cicely Lloyd read the following question:

“The Brighton Multicultural Women’s Cycle Club (aka The BMWs) has been meeting in Preston Park Velodrome for 2 years. Our members find negotiating traffic in Brighton the biggest barrier to cycling around the city. Good cycle lanes we do have, like Valley Gardens and Madeira Drive, do not sufficiently link up to form a network. We were excited by the plans for new funded (and consulted on) cycle lanes for London Road, Valley Gardens Phase 3 and the A259 in Hove. Please can you explain why you have abruptly stopped the implementation process without consulting key stakeholders like us?”

11.36 The Chair provided the following reply:

“We are fully supportive of Active Travel and understand the importance of ensuring a joined-up walking and cycling network. We have not stopped these schemes; rather committed to review to improve. As a new administration we are undertaking a review of some of the schemes such as Valley Gardens Phase 3 and the A259 Fourth Avenue to Wharf Road cycle lanes in Hove to ensure that they provide the best solution for all users of the transport network. This demonstrates our commitment to robust, sustainable, integrated, equitable, accessible active travel in our city that works for all”.

11.37 Cicely Lloyd asked the following supplementary question:

“Why have you not consulted?”

11.38 The Chair provided the following reply:

“In the development of schemes there is a robust consultation process. This Administration have paused to see if it was possible to make the scheme better. There

will be an opportunity for consultation within that process and we are reviewing, not stopping the scheme”.

## **(11) Valley Gardens**

11.39 Duncan Blinkhorn read the following question:

“Decent cycle lanes are crucial for enabling more people to travel actively. Valley Gardens is a fantastic example. However, with phase 3 still not started, the cycle lane stops abruptly, making getting to the seafront incredibly difficult. Progress has shockingly been stopped by this administration, in spite of Labour councillors having repeatedly voted for the plans.

This repeats a previous Labour administration’s ‘review’ which delayed Phase Two by two years, at huge expense, and jeopardising safety.

How can the administration justify delaying and adding unnecessary expense to this excellent, funded plan that so urgently needs to be completed?”

11.40 The Chair provided the following reply:

“We are fully committed to the Valley Gardens Phase 3 scheme which is a key scheme in the heart of the city. Our review will ensure that the scheme provides the absolute best value for money and provides maximum benefit for all users and is safe. Returning to schemes to amend after construction is more costly than getting it right once. This is too important not to review and improve before implementation”

11.41 Duncan Blinkhorn asked the following supplementary question:

“Can you sympathise with those that are trying and wanting to get around the city by bike who have been waiting in great anticipation for so many years now only to see implementation rolled back again?”

11.42 The Chair provided the following reply:

“Labour is absolutely committed to Valley Gardens, we put forward the scheme and we’re very supportive of the developments to date”.

## **(12) A23**

11.43 Andy Keetch read the following question:

“The previous administration won £3million to deliver two Active Travel schemes, the A259 and the A23. Labour voted in favour of both schemes but you have now halted the A259 which would have also greatly enhanced disability access in the area. This was NOT in your manifesto and will certainly mean the withdrawal of funding from Active travel England. You have not yet indicated the fate of the consulted on and finalised plans for the A23. Can you confirm that you will not seek to redesign, scrap or delay the plans to improve cycling and access on the A23?”

11.44 The Chair provided the following reply:

“I have already said in previous responses we are committed to Active Travel and understand the importance of key schemes such as the A259 Active Travel Scheme we plan to review the designs and bring back a better scheme which will work harder to deliver the benefits for active travel and ensure it's a scheme that delivers accessibility for disabled users.

We will directly communicate our support of active travel schemes and our ambition to deliver a high-quality walking and cycling networks to the Department for Transport and Active Travel England. Our focus at the moment is the critical redesign of the A259 with demonstrable improvement that provide better use of the space available and cycle lanes more in line with Active Travel Fund's standards; safer interface with pedestrians and keep scope for future enhancement of the A259 as a potential bus route through keeping two lanes on the highway in both directions. These amendments to the existing design will be brought back to this Committee”.

**(C) Deputations**

**(1) Car Free Developments Further traffic calming measures requested for Franklin Road**

11.45 The Committee considered a deputation requesting traffic calming measures on Franklin Road.

11.46 The Chair provided the following response:

“Franklin Road already has substantial traffic calming in the form of road humps that are nationally accepted to be the best form of traffic calming and are proven to lower speeds.

This traffic calming was installed many years ago, presumably as there must have been a number of collisions in the area, and this would appear to have worked as in the past three years there have only been two injury causing collisions in the area.

None of these were caused by excessive speed. With only very limited budgets available to us we currently concentrate spending this little money on places where a number of injury causing collisions are occurring and presently the council are prioritising junctions where there have been at least six collisions; with other junctions under review”.

11.47 Councillor Davis moved a motion to request an officer report.

11.48 Councillor Bagaeen formally seconded the motion.

11.49 Officers explained that this particular area could be reviewed under the Better Streets Programme.

11.50 Councillor Davis withdrew the motion.

11.51 **Resolved-** That the Committee note the deputation.

**12 ITEMS REFERRED FROM COUNCIL**

**(A) Petitions**



**(1) Improve the Bus Service to Bevendean**

12.1 The Committee considered a petition referred from Full Council requesting improved bus services to the Bevendean area.

12.2 The Chair provided the following response:

The 48 bus is a commercial bus service operated by Brighton and Hove Buses (BHB) and as such the Council has no direct control over its frequency or operations, however we work with all local bus operators as part of a successful Enhanced Bus Partnership to improve bus services in the city. I requested officers to contact Brighton & Hove Buses and they have given the following response to our enquiry.

*“Like most bus operators across the UK, we have been suffering with a shortage of drivers which has unfortunately affected the service provided. We apologise for this. The situation has improved recently following a successful recruitment campaign and the service operation has been much better over the past few months with over 99% of the scheduled journeys on route 48 operating. We will continue to monitor usage on route 48 and will review the frequency if the demand can justify it and we can resource it. There would be no point in increasing the frequency of the timetable if we were unable to operate the additional journeys. Our current priority is to ensure a high quality of operation of the current level of service. We had planned to replace the oldest vehicles on this route and others in the city back in 2021 but the disruption and uncertainty caused by Covid unfortunately meant that new bus orders had to be delayed. We now have new buses on order which will enable the oldest buses in our fleet to be retired very early next year.”*

12.3 **Resolved-** That the Committee note the petition.

**13 MEMBER INVOLVEMENT****(B) Written Questions****(1) Speed Cameras**

13.1 Councillor Fishleigh read the following question:

“How much does it cost to install and maintain a speed camera, and what advice would you give to residents who would like to see more of these on roads where traffic routinely breaks the speed limits?”

13.2 The Chair provided the following reply:

“The Sussex Safer Roads Partnership operate speed cameras on behalf of Sussex Police so this question should be directed to them at [www.sussexsaferoads.gov.uk](http://www.sussexsaferoads.gov.uk) who will be able to advise”.

**(2) Parking meters**

13.3 Councillor Fishleigh read the following question:

“How will people who don’t have mobile phones be able to use parking meters in the city?”

13.4 The Chair provided the following reply:

“The parking meters are no longer operational. If you do not have a mobile phone, you can pay for parking by cash or card at any shop in the city with the PayPoint sign. You’ll need the parking location number which is on signage and the vehicles registration number. There are over 150 shops with PayPoint in Brighton & Hove. The PayPoint vendor locations are linked on the Council’s website and each vendor is encouraged to put up clear signage”.

13.5 Councillor Fishleigh asked the following supplementary question:

“There are three pay for parking outlets in Rottingdean and none of the nearby shops have a Paypoint outlet so please will you suspend paid for parking until that is rectified?”

13.6 On behalf of the Chair, officers agreed to contact Councillor Fishleigh directly.

### **(3) Pedestrian Crossing**

13.7 Councillor McNair was unable to attend the meeting so a response was sent in writing.

### **(4) Excessive Cycle Speeds**

13.8 Councillor Earthey read the following question:

“What steps can be taken to enforce the speed limit along the undercliff between the Marina and Saltdean to stop cyclists travelling at excessive speeds, and endangering pedestrians?”

13.9 The Chair provided the following reply:

“The Undercliff Walk is used by pedestrians and cyclists, and we hope people consider and respect each other’s safety. This is especially true during busy periods like on weekends and during good weather.

There are signs from the Marina to Saltdean including certain areas where cyclists are asked to dismount such as the Ovingdean Café. This is for everyone’s safety. We want everyone to enjoy the Undercliff Walk and we ask they do so responsibly in a way that doesn’t put others at risk of harm.

Officers have recently reviewed the signage and agree that the ramps at Saltdean require some enhancement. In addition to this, officers will support Sussex Police with three planned action days at various locations on the undercliff in July to remind cyclists of their responsibilities. Enforcement is a police matter, and all incidents should be reported to Sussex Police”.

### **(5) Excessive e-scooter speeds**

13.10 Councillor Earthey read the following question:

“What steps can be taken to prevent e-scooters from speeding along the same undercliff and endangering pedestrian?”

13.11 The Chair provided the following reply:

“All E-scooters are currently illegal on the public highway (footway and carriageway) in the city. Brighton & Hove is not taking part in the current Dept for Transport authorised trials for hire fleets in England which have been running since November 2020 and are due to be reviewed in May 2024.

Privately owned E-scooters are legal for use on private land in the UK with the landowners' consent. The undercliff is not public highway but is council land, and in this case a byelaw permitting e-scooter use in this area would require committee approval. Enforcement is a matter for Sussex Police who are seizing E-scooters and imposing fines in campaigns across Sussex when resources allow. Three action days are planned by police in July, and Council officers will support these events”.

## **(6) Signage**

13.12 Councillor Earthey read the following question:

“Is it possible to put very clear signage up at either end of the Undercliff to encourage cyclists who wish to travel from the Marina to Saltdean and beyond to use the cliff-top cycle path as the preferred through-route?”

13.13 The Chair provided the following reply:

“Officers are currently reviewing the signage along the undercliff.

This will focus on encouraging those using the undercliff, including cyclists, to be aware of others and use the space accordingly.

It is important that any additional signage is targeted for it to be effective. Too much signage can be counter-productive. Both the cliff top and undercliff paths provide important routes for different cyclists and officers have advised that signing one route over the other is unlikely to be an effective solution. We are however looking at ways to increase awareness and reduce speeds”

13.14 Councillor Earthey asked the following supplementary question:

“Can you improve the signage as it is currently set against the cliff rather than in view”

13.15 The Chair provided the following reply:

“Officers will look at that as part of the review that is underway”.

## **(7) Signage**

13.16 Councillor Earthey read the following question:

“Is it possible to erect no-cycling signs and barriers at the three cafes (Ovingdean Café, Molly’s, and The Whitecliffs Café) to protect the food/drink queuing and seating areas from cycles and e-scooters?”

13.17 The Chair provided the following reply:

“As per my previous reply, officers are currently reviewing the signage and barriers along the undercliff to identify where additional or replacement signage may be useful”.

**(8) Wardens**

13.18 Councillor Earthey read the following question:

“Can BHCC offer occasional patrols from cycle or undercliff ‘wardens’ at peak times to enforce restrictions (we have litter wardens, but no 4-year old child ever got put in hospital by the dropping of litter)”.

13.19 The Chair provided the following reply:

Seafront Officers patrol the Undercliff every morning and will always ask cyclists to dismount if they are cycling in an area where cycling is not permitted. These patrols will be increased during the school summer holidays when a member of the Seafront Team will be based in The Deans on a quad bike during the day. Their main focus will be on water safety and supporting the lifeguards but they will speak to cyclists if they observe any unsafe activity”.

**(9) A259**

13.20 Councillor Davis read the following question:

“Can the Chair update the committee on the progress of the A259 report and give a cost to date on the contractors fees?”

13.21 The Chair provided the following reply:

“Thank you for your question on the A259 Cycle and Pedestrian Improvement scheme. Officers are liaising with Contractors regarding the termination of the Construction Contract the financial implications have not yet been determined but will be reported back to this Committee once we have this alongside proposals to implement a redesigned bidirectional cycle facility and improved pedestrian access along the seafront”.

**14 CONSTITUTIONAL MATTERS: TRANSPORT & SUSTAINABILITY COMMITTEE**

**Resolved-**

- 1) That the committee’s terms of reference, as set out in Appendix 1 to this report, be noted; and

- 2) That the committee agrees to establish an Urgency Sub-Committee consisting of the Chair of the Committee and two other Members (nominated in accordance with the scheme for the allocation of seats for committees), to exercise its powers in relation to matters of urgency, on which it is necessary to make a decision before the next ordinary meeting of the Committee.

## **15 CYCLE HANGARS - REVIEW AND RECOMMENDATIONS FOR FUTURE MANAGEMENT**

### **Resolved-**

- 1) That Committee agrees to note the report and existing installation programme to complete the Cycle Hangar Scheme.
- 2) That Committee agrees for officers to negotiate a further two-year contract to enable a full financial evaluation and preparation of a Business Case to enable determination of alternative delivery models. See section 4 for further details.
- 3) That Members agree for a further report to come back to this Committee updating on progress with the scheme and with full details of any further financial implications and proposals for going forward.

## **16 ROTTINGDEAN HIGH STREET AQMA PROJECT**

- 16.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that sought approval to temporarily remove the planter placed in the southbound carriageway of Rottingdean High Street north of its junction with Park Road once a 4-week period of monitoring traffic diversions on Steyning Road was completed.

- 16.2 Councillors Davis and Wilkinson asked questions and contributed to the debate.

### **16.3 Resolved-**

- 1) That the Committee delegates authority to officers to remove and store the planter following a four-week period of traffic counts on Steyning Road ending on 22 July 2023.
- 2) That the Committee delegates authority to officers to conduct a follow up four-week traffic count on Steyning Road beginning on Monday 04 September 2023.
- 3) That the Committee delegates authority to officers to decide whether the planter will be reinstated based on air quality and traffic counter results.

## **17 PARKING SCHEME UPDATE REPORT**

### **Resolved-**

- 1) That the Committee having taken account of all duly made representations and comments, agrees there will be no change to the days and times of operation in Zone U (Coombe Road area).

- 2) That the Committee having taken account of all duly made representations and comments, agrees to proceed to the next stage of the detailed design for the Southall Avenue. This will consist of a consultation to join the existing light touch parking scheme Zone U (Coombe Road area).

**18 SCHOOL STREETS - ETROS****Resolved-**

- 1) That the Committee, having taken account of all duly made comments and representations, as detailed at Appendix 1, agrees that the provisions of ETRO-27-2022 (Downs Junior School) is to be made permanent.

**19 ITEMS REFERRED FOR FULL COUNCIL**

- 9.1 No items were referred to Full Council for information.

The meeting concluded at 6.15pm

# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 24(b)

**Subject:** Written Questions

**Date of meeting:** 3 October 2023

A period of not more than fifteen minutes shall be allowed at each ordinary meeting for questions submitted by a member of the public.

The question will be answered without discussion. The person who asked the question may ask one relevant supplementary question, which shall be put and answered without discussion. The person to whom a question, or supplementary question, has been put may decline to answer it.

The following written questions have been received from members of the public:

**(1) Road Condition- Paul Johnson**

I commend the contractor who lays new roads in Brighton they are smooth and top class.

What can be done to enhance to disastrous condition of our roads after they are dug up. All roads that have been dug up have not been filled properly. They are sloppy, bumpy, holes appears and as such, create more wear & tear on our vehicles, motorcycles and bicycles or scooters.

When will the council institute a mandatory review of all work done and get the work approved before invoices are paid?

**(2) Carbon Neutral 2020 plan- Steve Peake**

"Will the new administration honour the commitments in the Carbon Neutral 2030 plan?"

**(3) Transport emissions- Neil Younger**

The Council Plan 2023-2027 says 'the Council will ensure all decisions made by the Council will take account of the climate and biodiversity crisis.' Will you confirm that the CO2e benefits and disbenefits of Transport interventions will be properly quantified and opened to public scrutiny before decisions are taken?

**(4) Clean Air Zone- Adrian Hill**

The 2023 air quality report shows illegal levels of NOx pollution at least 12 locations. The 6 month preliminary report shows no improvement. All other locations violate WHO guidelines for health. Source apportionment reports show diesel cars cause 50% of all NOx on illegally polluted New England Road. Hollingbury Road, diesel cars cause 75% of all traffic related NOx. Petrol causes <1%. Labour's manifesto promised to "...bring an end

to...polluting diesel vehicles". We know Brighton's toxic air causes illness and death. We know Clean Air Zones work. We must declare a Clean Air Zone immediately, can you agree?

**(5) Parking Permits- Laura King**

Are there any plans for Brighton and Hove City Council to review emissions-based resident parking permits?

**(6) Parking Review- Reginald Woodhouse**

When is the council planning to host the promised Autumn parking review?

**(7) Emissions Charging- Michael Adams**

Can you confirm that there are no ULEZ or CO2/ NO2 emissions charging schemes, for Residents, Visitors or Traders vehicles, driving from one place to another in the City of Brighton & Hove?

**(8) Paypoint- Carol Wilson**

What action has the Council taken to guarantee that residents and visitors can easily access the PayPoint facility to pay for parking in the event that the digital/phone option does not work?



# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 25a

**Subject:** Petitions referred from Full Council

**Date of meeting:** 3 October 2023

**Report of:** Executive Director for Governance, People & Resources

**Contact Officer:** Name: John Peel  
Tel: 01273 291058  
Email: [john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)

**Ward(s) affected:** All

### 1. Purpose of the report and policy context

- 1.1 To receive petitions presented at the Full Council meeting held on the 20 July 2023.

### 2. Recommendations

- 2.1 That the committee responds to the petition either by noting it or where it is considered more appropriate, calls for an officer report on the matter.

### 3. Context and background information

- 3.1 To receive the following:

#### **Petitions**

#### **1) Re-instate parking meters**

We the undersigned petition Brighton & Hove Council to re-instate all existing cash and card parking meters in Brighton and Hove immediately. Changing payments to an app only system requires drivers to have a smartphone with a connected bank account available at all times. This is discriminatory against certain people, for example: - The elderly and others who may have difficulty managing the technology - People who don't wish to have a smartphone, or to have to carry one with them at all times, whether that is for personal reasons or reasons of general privacy. - Visitors to the city, who may not want to download a new app for a short trip. - People that are worried about security issues when connecting bank accounts to phones. - People on Pay As You Go phone contracts that may not have credit available on their phones when needing to park.

#### **2) On street Hospital parking- Zone H**

We the undersigned petition Brighton & Hove Council to Leave the parking charges around the hospital as they are. Many hospital staff use the

surrounding roads to park so they can attend their long shifts at your local city hospital. The new hospital has has a huge recruitment drive in the past few years, bringing lots of people to the area.

Staff work more than 8 hours per day as any normal set shift, with a huge percentage of the staff regularly working 12.5 hour shifts, this puts the price increase at 198% from what it is already! This is not sustainable.

Please support the hospital staff get to work by signing this petition. With no staff there is no service.

# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 26(b)

**Subject:** Member Questions

**Date of meeting:** 3 October 2023

The question will be answered without discussion. The person who asked the question may ask one relevant supplementary question, which shall be put and answered without discussion. The person to whom a question, or supplementary question, has been put may decline to answer it.

The following written questions have been received from Members:

**(1) Councillor Fishleigh- Greenways**

Farmer Ben Carr attended the 6 July meeting of this committee to request that BHCC implement a no overnight camping ban on Greenways road in Ovingdean.

This is because his crops are being damaged by people living in vehicles. The response he received is that the Council's highways lawyers need to investigate how to introduce a new bylaw. What progress has been made?

**(2) Councillor Fishleigh- Paypoint**

On 6 July I wrote to the chair of this committee and officers to inform them that Handy Hardware in Rottingdean is open to becoming a PayPoint location.

Unfortunately, PayPoint has not been in touch with the shop's owners. Why is this?

**(3) Councillor Fishleigh- Valley Gardens 3**

What is the projected price for the implementation of the agreed plan for Valley Gardens 3 based on 2023 building costs?

**(4) Councillor Fishleigh- Black Rock**

How will the new link road between Black Rock and the marina be used over the next one, five and ten years?

**(5) Councillor Fishleigh- Drains**

Blocked drains cause puddles which endanger all road users. What is the process for identifying which roadside drains need to be cleared?



# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 27

**Subject:** Carbon Neutral 2030 Programme – Annual Report 2022-23

**Date of meeting:** 3 October 2023

**Report of:** Executive Director, Economy, Environment and Culture

**Contact Officer:** Name: Kirsten Firth  
Email: [Kirsten.firth@brighton-hove.gov.uk](mailto:Kirsten.firth@brighton-hove.gov.uk)  
  
Name: Rachel Williams  
Email: [rachel.williams@brighton-hove.gov.uk](mailto:rachel.williams@brighton-hove.gov.uk)

**Wards affected:** All

**For general release**

### **1. Purpose of the report and policy context**

- 1.1 The 2030 Carbon Neutral Programme is one of the council's key commitments with an ambitious target to become a carbon neutral city by 2030. The 2030 Carbon Neutral Programme Annual Report 2022-23 at Appendix 1 updates on progress. The committee is asked to note progress to date, and proposed developments for 2023-24.

### **2 Recommendations**

- 2.1 That Committee notes the progress made on the 2030 Carbon Neutral Programme as set out in the Annual Report at Appendix 1.
- 2.2 That Committee notes the progress made on the Carbon Neutral Fund as set out in paragraphs 3.4–3.8.
- 2.3 That the Committee agrees the proposed developments to the Programme in 2023-24 as set out in paragraph 3.12.

### **3. Context and background information**

#### **Annual Report on 2030 Carbon Neutral Programme**

- 3.1 In December 2018, Brighton & Hove City Council declared a climate and biodiversity emergency with cross-party commitment. In Autumn 2020, the council held a [Climate Assembly](#) and local young people delivered a Youth Assembly, both on the topic of travel and transport. Ongoing development of climate action work was brought together in the [2030 Carbon Neutral Programme](#) and approved by Policy & Resources Committee in March 2021, with a commitment to bring annual reports to committee.

3.2 The strategic aims of the 2030 Carbon Neutral Programme are to:

- Cut greenhouse gas emissions from across the city by 12.7% annually
- Enhance biodiversity
- Adapt to climate change

3.3 The current corporate programme is a range of projects which are owned by teams across the council. This broad approach has been important in embedding climate action in different services. The Sustainability Team supports, develops, manages and monitors the programme but does not directly deliver most projects. In 2022-23, highlighted achievements of the Carbon Neutral Programme include:

- Award-winning development of 42 energy-efficient council homes at Victoria Road in Portslade, specially designed with ground source heat pumps, solar panels and high levels of insulation, to keep residents' fuel bills low.
- Over 350 Electric Vehicle chargepoints now in place plus 3 on-street rapid taxi charging hubs, with rapidly increasing usage of all chargepoints; ongoing programme of actively pursuing funding for additional chargepoints. BHCC in top 5 councils across the country for expanding access to EV chargepoints. Four electric refuse trucks now in operation, with more on order. Switching to electric-powered vehicles is one of the most significant actions to cut emissions from transport and improve air quality.
- The Wilding Waterhall project to 'wild' a former council golf course, restoring fragile chalk grassland and improve habitats for wildlife, while improving access for local residents and visitors.
- Introducing new Environmental Sustainability and Social Value policies to be used in all procurement by the council of goods and services.

#### 3.4 **The Carbon Neutral Fund**

The Carbon Neutral Fund (CNF) is a strand of the Carbon Neutral Programme. Along with the one-off Climate Action Fund for transport and travel projects, and the previous Sustainability & Carbon Reduction Investment Fund (SCRIF), it has funded over £20 million of projects between 2019 and 2023.

3.5 This council capital funding has helped to develop and accelerate council projects to reduce carbon emissions, enhance biodiversity, and adapt to climate change. A list of the 2022/2024 projects can be found in the Background Documents to this report. Over the last year, there has been an increased focus on project monitoring, with enhanced 6-monthly progress reporting, the introduction of new funding conditions around spend, and the establishment of 6-monthly CNF project lead meetings. The next CNF project progress reports will cover the six-month period to November 2023.

Table 1: CNF allocations to projects with spend and commitments at May 2023

CNF Round	Allocated to projects	Spent at May 2023	Committed at May 2023	Spent or committed at May 2023	% Spent or committed at May 2023
2019/20 SCRIF	£0.382m	£0.329m	£0.022m	£0.351m	92%
2021/22 CNF	£3.118m	£0.969m	£0.462m	£1.431m	46%
2021/22 CNF- Transport & Travel	£3.900m	£2.561m	£0.201m	£2.762m	71%
2021/22 Climate Action Fund – Transport & Travel	£1.404m	£0.202m	£0.006m	£0.208m	15%
2022/24 CNF including ring-fenced allocations	£12.055m	£0.464m	£0.433m	£0.897m	7%
<b>Total</b>	<b>£20.859m</b>	<b>£4.525m</b>	<b>£1.124m</b>	<b>£5.649m</b>	<b>27%</b>

- 3.6 See Table 1 for allocations, spend and commitment data across the different rounds of the CNF at May 2023. The first round 19/20 SCRIF is close to being fully spent with 92% spend or committed. The CNF 21 spend or committed rate of 46% shows significant improvement on the previous 6-monthly reported figure of 24% in November 2022. The CNF Transport & Travel is well advanced with a spent or committed rate of 71%. The Climate Action Fund, supporting transport and travel measures addressing the 2020 city Climate Assembly recommendations, is less advanced at 15% spent or committed. Spend to date has included work on installing accessible bus stops, and development work for the Liveable City Centre project. Progress has been slower than anticipated due to the availability of staff resources, although the development and delivery of other schemes focused on active travel and public transport, which are consistent with the priorities of the Climate Assembly, has been achieved having secured other external grant funding.
- 3.7 Agreed in October 2022 most of the 22/24 projects are now underway; many of these projects needed more lead-in time as they are new projects. It should be noted that capital expenditure programmes are planned between six months and a year in advance. The 2022/24 CNF round involves projects that have more preparatory work to do before they can commit the spending. This includes project planning, undertaking audits, identifying staffing resources, as well as working through planning permission and procurement processes. Over the last year there has also been some reworking of projects due to cost inflation. It should be noted that new CNF criteria introduced in 2022 have precluded teams starting new projects until their previous CNF project(s) spend reaches 50%.
- 3.8 The 22/24 allocation includes the ring-fenced CNF allocations that were set out at Budget Council in February 2022, and agreed at P&R Committee on 7

July 2022 (see link in Background Documents below). Of these, £1.1m previously allocated to 'Expanding Liveable Neighbourhoods' was reallocated at February 2023 Budget Council to the public toilets capital programme. Similarly, the Hanover & Turner Liveable Neighbourhood Committee report on today's Transport & Sustainability Committee agenda proposes to seek Strategy, Finance and City Regeneration (SFCR) Committee approval to reallocate £0.4m from the CNF to the Local Transport Plan capital programme. It should be noted that the TBM 5 Budget report to SFCR Committee on 5 October 2023 seeks to approve £0.733m of the ring-fenced CNF for 'Carbon Reduction Measures to Operational Buildings' to fund roof mounted solar PV on corporate landlord and leisure sites.

### **3.9 Key Performance Indicator – City-wide Carbon Neutral target**

City-wide greenhouse gas emissions stood at 812,000 Tonnes CO<sub>2</sub>e in 2021, the most recent year for which data is available. This was a slight increase on the previous year 2020, which had shown a significant fall due to the restrictions on travel and economic activity imposed during Covid pandemic lockdowns. Across the city as a whole, carbon emissions have fallen by nearly half since 2005.

3.10 Emissions from the council's own corporate estate and operations were 16,078 Tonnes CO<sub>2</sub>e in 2022-23, a fall of 12.8% on the previous year. Council emissions have fallen by more than 58% in the 10 years since 2013.

3.11 More information and graphs are available in the Annual Report at Appendix 1.

### **3.12 Development of Carbon Neutral Programme in 2023-24**

During 2023-24, key areas for future development of the 2030 Carbon Neutral Programme include:

- Develop Decarbonisation Pathways to drive strategic planning and prioritise most impactful actions towards carbon neutral target (reporting Spring 2024)
- Climate Risk and Vulnerability Assessment to understand the local impacts of future climate change and prioritise actions to adapt and improve resilience (reporting Autumn 2023)
- Explore options for raising investment to deliver more local climate action projects.
- Develop evidence base for City Plan Part One review, to support new planning policies to cut carbon, enhance biodiversity, and adapt to climate change.



- Emphasise climate justice and social and economic co-benefits of climate action, such as tackling the cost-of-living crisis, and health benefits from clean air.
  - Develop strategic climate partnerships focused on reducing carbon emissions, with businesses, major institutions and organisations
  - As lead partner of The Living Coast Biosphere, work with partners to prepare our submission to UNESCO for the renewal of Biosphere status
  - Continue to develop specific communications campaigns and lines of engagement with our communities and residents to share information and encourage positive behaviour change
  - Investigate tools for monitoring carbon impact of Scope 3 emissions
- 3.13 Brighton & Hove City Council's corporate carbon emissions are only a tiny fraction (less than 2%) of the total for the city. Collaboration with businesses, institutions and communities is essential to reach our carbon neutral target. In 2023-24 the council, with community partners, will explore options for partnerships with city institutions, businesses and public sectors, to help coordinate a collaborative city-wide response.

#### 3.14 **External interest and scrutiny of BHCC's Carbon Neutral Programme**

There will continue to be great interest in BHCC's programme from local media, students, other local authorities, Freedom of Information enquiries, residents and community organisations but also national organisations like the Local Government Association which often seeks information via surveys and case studies, UK100, and Climate Emergency UK. Publishing an annual report on the programme demonstrates BHCC's commitment to continuing climate action.

### **4. Analysis and consideration of alternative options**

- 4.1 In 2023-24, the Decarbonisation Pathways study will develop several scenarios for achieving our goal to reduce greenhouse gas emissions. The scenarios will include 'Business as Usual', 'Maximum effort' and other scenarios tailored to the unique qualities of Brighton & Hove's geography and communities. This will enable an evidenced assessment of options, taking into account funding, capacity and leadership.
- 4.2 Not taking action on the climate would leave the city vulnerable to the impacts of climate change such as increased heatwaves, aridity, storms, heavy rainfall and flooding. These impacts are being examined in the Climate Risk and Vulnerability Assessment and an Action Plan drawn up.

### **5. Community engagement and consultation**

- 5.1 Consultation took place on the Programme in 2020 and 2021 via BHCC's Climate Assembly and online consultation platform Bang the Table / Climate Conversations. The Carbon Neutral Programme is a corporate initiative which sits in different departments across the council. As projects are developed, council officers consult with residents and stakeholders as appropriate. Communication also takes place through the council's Brighton & Hove Connected partnerships.
- 5.2 The council's website includes a comprehensive Climate Hub with pages on all aspects of council action, and regular news items.

## **6. Conclusion**

- 6.1 Publishing the 2030 Carbon Neutral Programme Annual Report will demonstrate Brighton & Hove City Council's continuing commitment to climate action on carbon emissions, biodiversity and adaptation to climate change. It will help to engage public, press and campaigning organisations. It will raise the profile of BHCC's climate action work with other local authorities, NGOs, regional and national government and provide background evidence when seeking funding for additional climate projects.

## **7. Financial implications**

- 7.1 A total of £21.804m has been made available toward SCRIF, CNF and Climate Action Fund investments for the Council through capital borrowing. The cost of the borrowing has been incorporated into the Council's Medium Term Financial Strategy with some schemes allocated on a spend to save basis such as investment into carbon reductions on operational buildings. Allocation of these investments to specific schemes and programmes within the Council's Capital Investment Programme have been reported to Policy and Resources Committee for approval. Details and progress of the schemes from this fund are included in Appendix 1 of this report. The progress of spend against these budgets are monitored and reported in line with the Council's Targeted Budget Management (TBM). Future allocations to new schemes with any balances held from the Carbon Neutral Fund will be reported back to Strategy, Finance and City Regeneration in due course including the proposed £0.4m to the Local transport Plan and £0.733m to the solar panels project.

Name of finance officer consulted: Rob Allen     Date consulted 21/09/23

## **8. Legal implications**

- 8.1 There are no legal implications arising from this report. Any relevant legal issues will be considered when individual Carbon Neutral Fund projects are brought forward for implementation.

Name of lawyer consulted: Elizabeth Culbert     Date consulted 13/09/23

## **9. Equalities implications**

- 9.1 The 2030 Carbon Neutral Programme Annual Report in Appendix 1 summarises actions and projects which address a wide range of inequalities, and this is built into project design in line with BHCC's commitment to be a fair and inclusive city and a healthy city where people thrive.
- 9.2 For example, help to tackle fuel poverty and cold homes addresses some of the worst impacts of cold homes for vulnerable people. Improving energy efficiency and installing solar panels and heat pumps in council homes increases access to renewable energy. Improving the convenience of public transport broadens travel options for residents on low incomes. Promoting the switch to electric vehicles through our EV chargepoint installations improves air quality and public health especially in the most congested streets. Circular Economy workshops on textiles promote reuse and repair. Tech-Takeback repairs electronic items and redistributes them via local community organisations, while also sharing repair skills.

## **10. Sustainability implications**

- 10.1 The 2030 Carbon Neutral Programme Annual Report 2022-23 provides an update on the council's progress towards its carbon neutral and biodiversity objectives. It will help to inform and engage local residents, communities, organisations and businesses in climate and biodiversity action.
- 10.2 The Carbon Neutral Fund will support delivery of the climate action projects included in the programme, many of which have co-benefits such as enhanced biodiversity, improved air quality and improved public health.

## **11. Other Implications**

### **Public health implications:**

- 11.1 The Carbon Neutral Programme has many co-benefits relating to public health. For example, tree planting and enhancing green spaces in the city has a beneficial impact on mental and physical health and wellbeing. Reducing emissions from transport helps to improve air quality and therefore people's health. Electric vehicle charging points also contribute to air quality improvements.

## **Supporting Documentation**

### **1. Appendices**

- 1. Carbon Neutral 2030 Programme Annual Report 2022-23

### **2. Background documents**

- 1. 2030 Carbon Neutral [Programme](#)

2. Carbon Neutral 2030 Programme – [Carbon Neutral Fund update](#) and [Appendix](#) – report to Policy & Resources Committee March 2023
3. [Allocation of Carbon Neutral Fund 2022-2024](#) and [Appendix](#) – report to Policy and Resources Committee October 2022
4. [Carbon Neutral Programme Reporting and Carbon Neutral Fund](#) and [Appendix](#) – report to Policy and Resources Committee July 2022

**Brighton & Hove City Council**  
**2030 Carbon Neutral Programme Annual Report 2022-23**

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## Introducing the 2030 Carbon Neutral Programme

The 2030 Carbon Neutral Programme has three strategic objectives:

- Reduce greenhouse gas emissions
- Enhance biodiversity
- Adapt to climate change

In December 2018, Brighton & Hove City Council declared a climate and biodiversity emergency in a cross-party commitment. The council held a [Climate Assembly](#) and Youth Assembly on the topic of travel and transport in autumn 2020. Ongoing development of climate action work was brought together in the 2030 Carbon Neutral Programme and approved by Policy & Resources Committee in March 2021.

This Annual Report documents progress on the Carbon Neutral Programme during 2022-23.

### Governance and reporting

The 2030 Carbon Neutral Programme is formally reported to the council's Transport & Sustainability Committee and an annual report produced. The City Environment, South Downs & the Sea Committee oversees progress on biodiversity.

The city council in 2022 achieved a positive [Carbon Disclosure Project](#) (CDP) score which found that the council has demonstrated best practice standards across adaptation and mitigation, has set ambitious goals, and made progress towards achieving those goals. The city's CDP score for 2023 is expected in Autumn 2023.

The Programme embeds climate action across many teams and projects in the council. Climate change training was introduced in 2022 to assist that culture shift for all staff, including Carbon Literacy training for senior leadership. Collaboration across departments adds value in developing service area action plans and is assisted by the council's Sustainability Team.

### Find information and get involved

The 2030 Carbon Neutral [Programme](#) and Annual Reports are on the council's website. News stories on climate action and events in the city are regularly published on the council's website and social media in our [Climate Action Hub](#). Find out what individuals and communities can do to cut their own [carbon footprint](#) and [restore nature](#).

In 2022-23, BHCC's [Climate Conversations](#) website hosted open discussions and consultations on climate matters. Consultations on individual projects and strategies are held as work progresses and we want to ensure everyone can have their say and participate.

## **The 2030 Carbon Neutral Programme in 2023-24**

The 2030 Carbon Neutral Programme will be updated in 2023-24 to enhance our strategic approach, increase collaboration, and help the council and the city progress towards our carbon neutral and biodiversity targets. We will continue to mainstream climate action across council Directorates and teams.

Key priorities for 2023-24 include:

- Develop Decarbonisation Pathways to drive strategic planning and prioritise most impactful actions towards carbon neutral target
- Climate Risk and Vulnerability Assessment to understand the local impacts of future climate change and prioritise actions to adapt and improve resilience
- Explore options for raising investment to deliver more local climate action projects.
- Develop evidence base for City Plan Part One review, to support new planning policies to cut carbon, enhance biodiversity, and adapt to climate change.
- Develop strategic climate partnerships focused on reducing carbon emissions, with businesses, major institutions and organisations
- As lead partner of The Living Coast Biosphere, work with partners to prepare our submission to UNESCO for the renewal of Biosphere status
- Continue to develop specific communications campaigns and lines of engagement with our communities and residents to share information and encourage positive behaviour change
- Enhance the social and economic co-benefits of climate action, such as tackling the cost-of-living crisis, and health benefits from clean air.

### **City climate action partnerships**

BHCC's corporate carbon emissions are only a tiny fraction (around 2%) of the city as a whole, so collaboration with businesses, institutions, and communities is essential to reach our carbon neutral target. The council with community partners is exploring city climate action partnerships to build a collaborative city-wide response. Existing city partnerships already place greater emphasis on climate action.

#### **Local partnerships working with BHCC on climate action**

- [Brighton & Hove Economic Partnership](#): An independent group of over 50 individuals from private, public and voluntary sectors supporting the economic prosperity of the city

- [Brighton & Hove Food Partnership](#): A non-profit organisation helping people learn to cook, eat a healthy diet, grow their own food and waste less.
- Brighton Chamber of Commerce [Net Zero champions](#) for business
- [Circular Brighton & Hove](#): supporting the circular economy with local businesses
- City Management Board: Key public service decision-makers in the city, it aims to strengthen and focus delivery of services in Brighton & Hove.
- Downland Advisory Panel: wide local community and expert representation, advising on the implementation of the council's City Downland Whole Estate Plan
- [Greater Brighton City Region](#) brings together partners in an economic area from Crawley and Gatwick Airport in the north to Lewes and Seaford in the east and Bognor and Littlehampton in the west and supports innovation in a green economy.
- [Green Growth Platform](#): award-winning green business-innovation network on a mission to create robust, future-proof businesses that minimise their impact on the planet.
- [Hydrogen Sussex](#) brings together business, research, education and local government across Greater Brighton and Sussex to support development of a hydrogen economy
- NHS Sussex [Together to Zero](#) strategic forum – the five NHS Trusts in Sussex working together to cut carbon emissions from all aspects of the local service.
- [Our City Our World](#) – schools in Brighton & Hove working together to use the power of education to advance environmental literacy and social engagement towards a more equitable and sustainable future.
- [South Downs National Park Authority](#): key partner in managing our Downland Estate and access to the countryside, as well as planning authority for some areas
- [Sussex Local Nature Partnership](#): over 30 organisations working through partnership and collaboration to “protect and expand natural capital and everything it gives us”
- [The Aquifer Partnership](#) (TAP): Educating about water resources to ensure groundwater remains a sustainable resource for the future.
- [The Living Coast](#) Biosphere, a regional environmental partnership, one of only seven UNESCO designated International Biosphere Reserves in the UK, designated as a living laboratory for sustainable development.
- Transport for the South East Decarbonisation Forum: exploring ways to measure and promote reduction in carbon emissions from transport.
- Brighton & Hove Transport Partnership - supporting an integrated and accessible transport system that minimises damage to the environment and promotes sustainable and healthy travel choices
- University of Brighton and University of Sussex partner the council on climate research from hydrogen to neighbourhood homes retrofit, to the circular economy.
- [VisitBrighton](#): The official tourism organisation for city of Brighton & Hove

### **Brighton & Hove City Council membership of climate organisations**

- UK100
- Race to Zero

### **Declarations & statements**

The council is a signatory to the following campaigning declarations:

Nature & Climate Declaration (May 2022)

Right to Food campaign (March 2022)

Glasgow Food and Climate Declaration (November 2021)

Cities Race to Zero (September 2021)



## Measuring progress towards our 2030 carbon reduction target

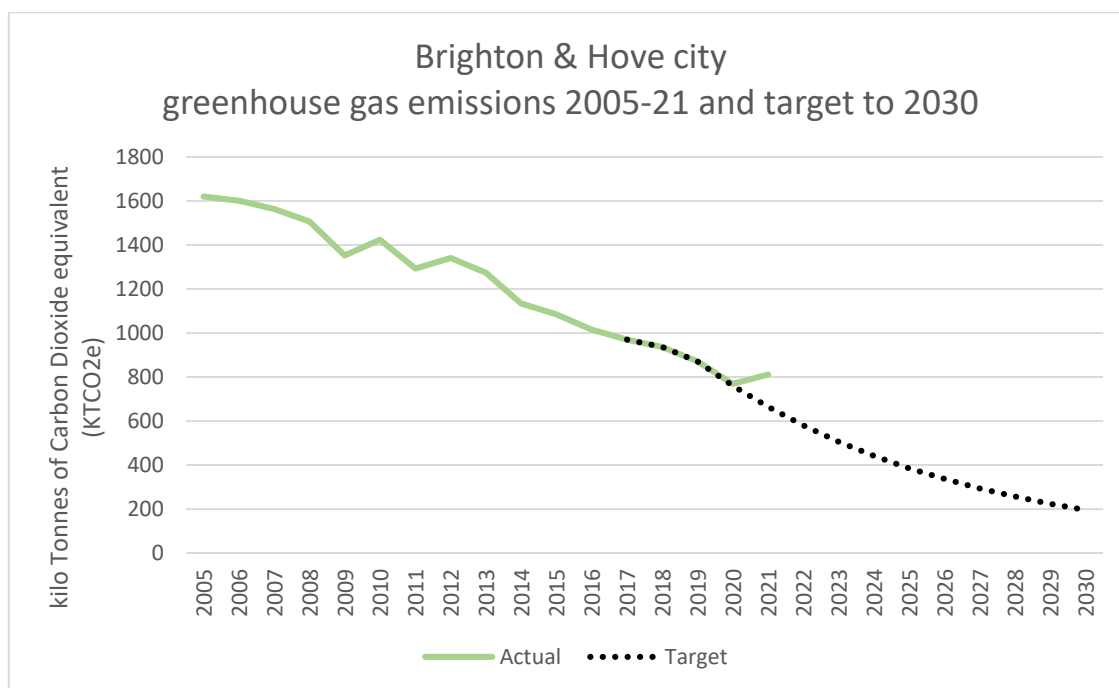
### 2030 Carbon Neutral Target

The council has set an ambitious target for the whole city to be carbon neutral by 2030. This Key Performance Indicator target requires greenhouse gas emissions for the whole city to fall by 12.7% annually from 2020 onwards. This is a science-based target, prepared by the [Tyndall Centre](#) for Climate Change, showing Brighton & Hove's fair contribution to keeping climate change within limits. Greenhouse gases include methane, nitrous oxide, and other gases as well as carbon dioxide.

This target includes greenhouse gas emissions from transport, housing, commercial buildings and agriculture; including emissions arising from gas, electricity, petrol / diesel and other fuels (also known as "Scope 1 and 2" emissions). It does not include "Scope 3" emissions from the goods and services consumed in the city but produced elsewhere, including most of our food, clothing, electronics, and construction materials (and likely to be greater than Scope 1 and 2 emissions). The council is investigating ways of measuring Scope 3 emissions.

### Progress on target – whole city

Emissions of greenhouse gases for the whole city of Brighton & Hove were 812,000 tonnes in 2021. The emissions 'bounced back' by around 5% following 2020, when many restrictions on travel and economic activity were experienced due to the Covid pandemic. This Key Performance Indicator is reported annually to the council's Transport & Sustainability Committee.



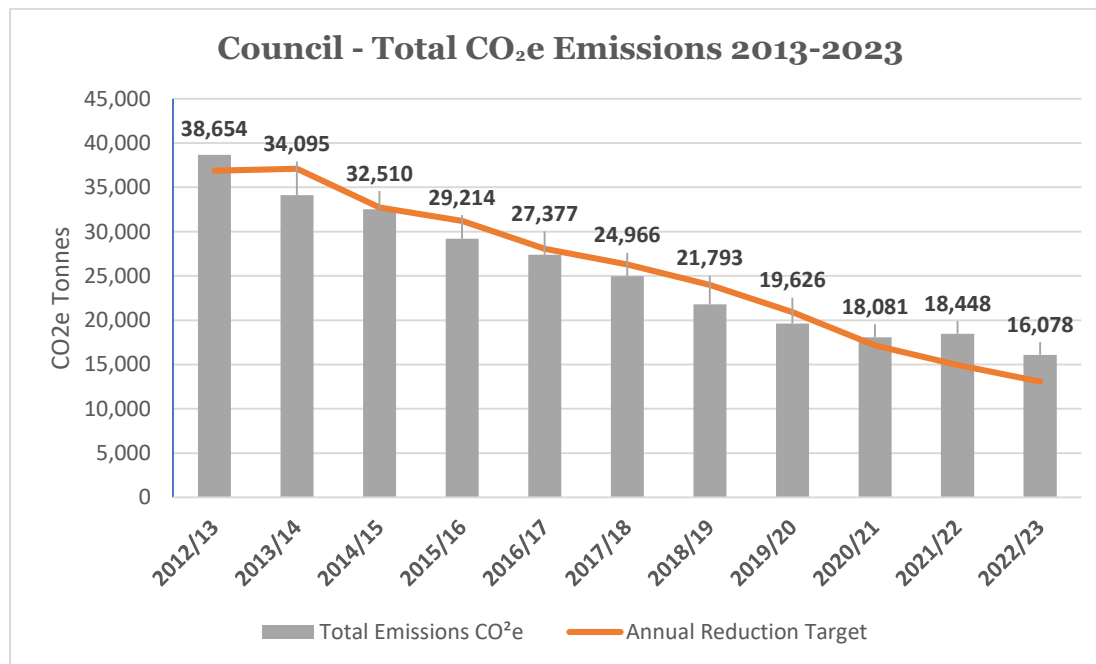
Since 2005, greenhouse gas emissions for the city have fallen by 809,000 tonnes or almost 50%. The largest reduction was from electricity, more renewable electricity from wind farms and solar power comes is added to the National Grid.

### **Brighton & Hove City Council's corporate carbon footprint**

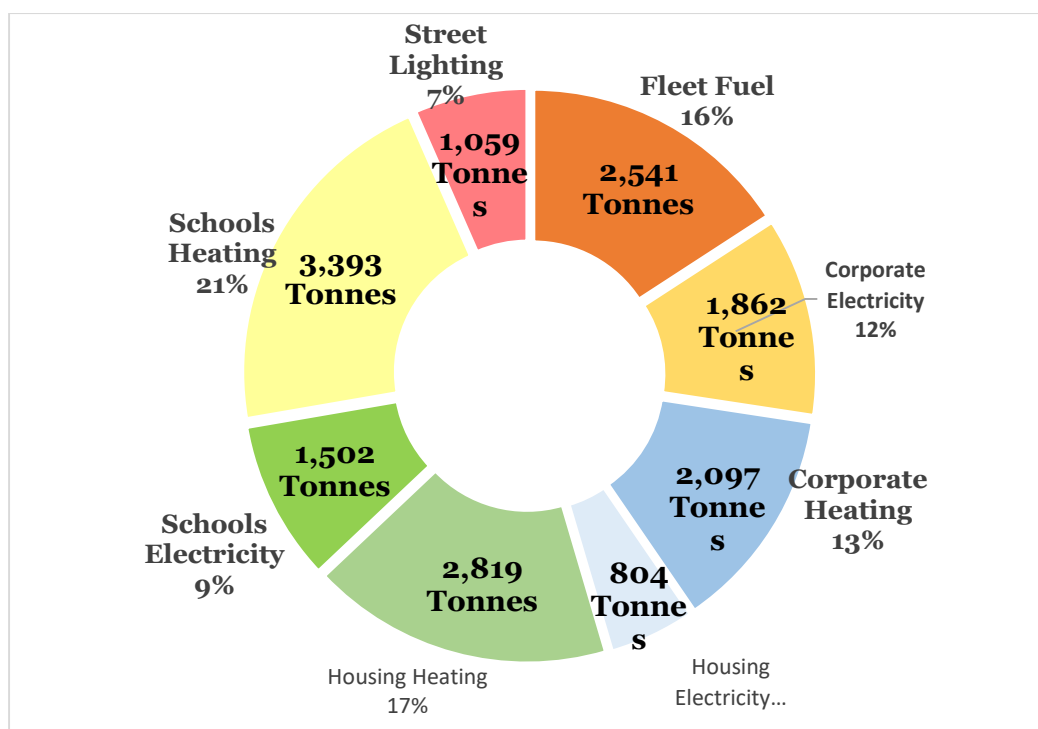
We measure emissions from the council's corporate estate and operations directly. Emissions are calculated using consumption of electricity and gas taken from utility supplier billing and meter readings, and the fuel consumption of our fleet of vehicles.

Council emissions were 16,078 Tonnes in 2022-23, a tiny fraction of city carbon emissions – around 2% of the total.

Council emissions have reduced by 58% over the last 10 years, with a reduction of 12.8% between 2021-2 and 2022-3. In particular, emissions from electricity consumption have fallen by 73% in the last decade and are likely to be minimal by the 2030 target date (less than 10% of current).



## Council - Total CO<sub>2</sub>e Emissions 2022/23 by service



### Measuring carbon savings from our actions

It is not always possible to measure the impact on carbon emissions from our actions. Where possible we have included a note of carbon savings in this report. In 2022-23, a rigorous [assessment of carbon savings](#) from projects funded through the council's Carbon Neutral Fund was carried out, indicating 9836.5 tonnes carbon dioxide equivalent (CO<sub>2</sub>e) forecast savings for 24 carbon-reduction projects

## Travel and Transport

### Local Transport Plan

The council's 2030 transport vision, key outcomes and principles is the 'direction of travel' for the [Local Transport Plan](#) for the city. The key principles underpinning the proposed strategy are: Reduce the need to travel; Shift how people travel; and Clean vehicle travel. The priority areas for investment and intervention are:

- Create an inclusive and integrated transport system
- Develop safe and well-maintained streets and places that encourage and enable active travel
- Increase public transport use
- Reduce the need for car ownership and car use
- Promote and facilitate the use of low and zero emission vehicles
- Promote and use technology to reduce and manage travel

### Local Cycling and Walking Infrastructure Plan (LCWIP)

In March 2022 the council approved its first [Local Cycling and Walking Infrastructure Plan](#) to plan strategically for active travel network infrastructure improvements. It will ensure the city is well placed to bid for future funding opportunities; incorporate cycling and walking into new developments, and secure improvements through the planning process; promote active travel and ensure a comprehensive network for everyday active travel journeys in the city and the countryside. Consultation will be carried out on the detailed designs of cycling and walking infrastructure schemes as they are taken forward.

### Increase use of public transport

Brighton & Hove benefits from a nationally recognised bus network. Before the Covid-19 pandemic, the city saw a sustained increase in bus use and had the highest number of bus trips per head amongst English local authorities outside of London. A contributor to this has been the Quality Bus Partnership between the council, operators and bus users, which the National Bus Strategy cites as a success. The council and operators have a strong track record of working through the partnership to deliver improvements to bus services.

In January 2023 the Council entered into a legal agreement, the Enhanced Partnership, to secure around £27 million to invest over 3 years up to 31 March 2025. This funding is expected to be invested in additional bus priority measures; new lower fares and simpler ticketing (focused on younger and older people); and enhancements to less frequent bus services which are financially supported by the council. The [Enhanced Partnership](#) is the mechanism for delivering the EP Schemes and Measures, which includes agreement from all the bus operators within the Brighton and Hove EP area.

Brighton & Hove Buses continues its journey towards a zero-carbon fleet with the introduction of hybrid electric buses, cutting emissions through the city centre to

improve air quality. There has been further investment into the bus network, introducing more bus shelters, real-time bus stops and schemes to reduce bus journey times. The Big Lemon bus company has been planning a fully electric fleet and ran a fully zero-emissions electric bus service on all its public bus routes for the first time in June 2022 (on Clean Air Day).

## **Electric Vehicle Charge Points**

The [council](#) continues to grow our [electric vehicle charging points network](#) and is now one of the top five leading councils in the country. To date 353 public chargers have been installed in the city and are operational. Independent research by Field Dynamics and Zap Map shows that 77% of residents with no off-street parking, now live within 5 minutes' walk of a public charger.

In 2022 three on-street rapid taxi hubs with 18 rapid charging bays (with 6 for public use) were installed and are now operational, with another added in 2023. These can fully charge most electric vehicles within an hour.

There is a steady increase in monthly usage for all charger types. The 250 lamp post chargers in the city which provide overnight charging are increasingly popular with electric vehicle drivers with twice as many charging sessions compared to the previous year. The public charging network recently passed the milestone of delivering over 1 million kilowatt hours of charging annually.

Assuming continued growth in EV take-up and public charger usage (in line with UK Power Networks predictions and the Department for Transport's 'Road to Zero' strategy), and continued decarbonisation of the national electricity grid, we estimate that the city's existing public charging network will prevent over 40,000 tonnes CO<sub>2</sub>e being emitted between 2019 and 2030. This estimate is likely conservative as, both rapid hubs and residential chargers are powered by 100% renewable energy. The council has a programme of submitting bids for government funding to increase the number of charge points on the public network.

This year the council is rolling out 100 more 'exclusive recharging only' parking bays. In January 2023 we received committee approval for the second phase of procurement of public charge points. This will add a minimum of 600 lamp post chargers, 250 fast chargers and 100 rapid chargers to the public network.

To improve the accessibility of EV chargers, the council has been working with our charge point operator EB Charging and Disabled Motoring UK who have provided valuable insights about all the different charge points in the city from a disabled car user's perspective. A bid for Innovate UK research funding has been successful and, with our partners, the council aims to develop a fully accessible charge point with a prototype booking system.

### **Climate-friendly travel for business**

Engaging with local businesses and organisations includes encouraging them to use and switch to electric cargo ([eCargo](#)) bikes for deliveries of goods and services. To do this the council leased eCargo bikes to 5 local SMEs, 2 council teams and an urban logistics company with funding from the Department for Transport's eCargo Bike Grant Fund. As of February 2022, 18,000 miles had been travelled by the local businesses making deliveries around the city with the eCargo bikes the council leased to them, and 6.9 tonnes of CO<sub>2</sub>e saved since the project started in 2020.

A second, expanded phase of the scheme aims to lease eCargo bikes to an additional 12 SMEs with funding from the council's Carbon Neutral Fund.

In addition to eCargo leasing, the council supports SMEs to acquire their own eCargo bikes, and provides impartial advice, free rider training and marketing opportunities. Through the Capability and Ambition Fund, the council also provides subsidy to local businesses that trial a local eCargo delivery service. To date, 26 small and medium sized enterprises (SMEs) have taken up our subsidy offer to switch to eCargo.

### **Bikeshare**

A new Bikeshare framework concession contract was awarded to Bikeshare operator Beryl in December 2022 following a full retender process. Beryl is in the process of soft launching a scheme which will expand by 30 Sept 2023 to provide city wide coverage with a fleet of 780 bikes and provide at least 96 hubs by Spring 2024. The fleet will be 60% electric pedal assist, 40% pedal only. The Framework allows for call offs by other authorities in the Southeast of England, and for call offs to establish parallel schemes under one 'Beryl BTN Bike Hire' brand in Worthing Borough, Adur District and Lewes District Council areas. This would allow frictionless customer journeys across the city's neighbouring authority boundaries, increasing the potential for fewer vehicle journeys into and through the city.

The co-benefits of this scheme were estimated and monetised using the Department for Transport's Travel Analysis Guidance Databook. The scheme is expected to yield 'High Value for Money' as a result of time benefits and Health and Absenteeism benefits for users, as well as benefits to non-users such as reduced accidents, congestion, noise, and air pollution.

### **Council fleet**

The council aims to have a zero-carbon fleet by 2030, including refuse vehicles and maintenance vans, phasing out petrol and diesel engine vehicles. Around 11.7% of the fleet has already been switched to electric vehicles. Since 2022 the council has brought in 56 electric vehicles and 4 [electric HGVs](#), with a further five on order. Rather than replace newer HGVs, the council seeks to convert these to electric or hydrogen.

Decarbonising the council's fleet also required a £408,000 investment in charging infrastructure at the Hollingdean Depot, including an upgrade to the nearby substation via UK Power Networks. This investment was funded through the council's internal Carbon Neutral Fund. The new substation and chargers were successfully installed in June 2022 with chargers installed in November 2022. The service now has the ability to charge 30 car/van size vehicles and 14 HGV's overnight, with a rapid charger for daytime charging.

Housing and Parks Departments also received £211,600 total funding to install rapid and fast chargers at locations across the city where there is greatest operational demand for the two services.

### **Investment in highway infrastructure**

The council is investing in the ongoing transition in transport and travel use by providing infrastructure that makes active, sustainable, and low emission travel more attractive options for people. Projects include infrastructure to expand zero emission transport; improvements to roads; maintenance schemes such as surface renewal or repairs to drainage; and repairing uneven pavements. This work has been delivered jointly with City Parks to support the street tree planting programme.

For example, works to improve safety and accessibility in Portland Road have been completed, by combining council funds with a S106 developer contribution to provide a more comprehensive scheme. The Carbon Neutral Fund has funded innovative low carbon works to extend the lifetime of concrete roads in Bevendean. These works mean fewer potholes for all road users, particularly important in areas which have high bus patronage.

## **Lighting replacement programmes**

### Street lighting upgrade (2017 – ongoing)

Since 2017, the Invest to Save programme has been [upgrading 18,000 lanterns](#) across Brighton, Hove and Portslade, fitting them with new low-carbon LED lights. More than 9 out of 10 of the city's lanterns have been replaced with work continuing to fit the rest with LED lights.

The programme has cut electricity use by 43% up to March 2023. Over the same period, carbon emissions have fallen to 1,056 tonnes CO<sub>2</sub>e, a reduction of over 73%. The completed scheme will require less maintenance and reduce the city's energy bills by several hundred thousand pounds per year.

In addition to reducing energy consumption and carbon emissions, 80-90% of the materials used in the manufacture of all replacement lanterns (by weight) comes from recycled sources.

### Traffic Signal Carbon Reduction Programme (2022/23)

The Traffic Signal Carbon Reduction Programme started in 2022 to replace traffic signal heads of 18 signals sites and their halogen bulbs with LEDs, with funding from the council's Carbon Neutral Fund. Replacing the heads in addition to the bulbs significantly reduces (87% less) the electricity used for the city's traffic signals, as well as the number of signal faults and vehicle journeys required to maintain them. By May 2023, traffic signal heads had been replaced at 8 sites, with 10 more sites planned for 2023/24.

### Public toilets refurbishment programme (2022/2023)

Phase 1 of the Public Toilet Refurbishment Programme was delivered over late 2022 and early 2023. Four sites were refurbished across the city. Site refurbishments included LED lighting replacements and installation of passive infrared (PIR) sensors, installation of sensor operated taps to limit water consumption, and replacement of hot water cylinders with low energy consumption cylinders with funding from the council's Carbon Neutral Fund.

### LED replacements at sports and leisure facilities (2021 - 2023)

The council has replaced existing luminaires with LEDs in two sports halls (Portslade Sports Centre and Stanley Deason Leisure Centre), floodlights at one astroturf (Stanley Deason Leisure Centre), and floodlights at one outside tennis court facility (Withdean Sports Complex) with funding from the council's Carbon Neutral Fund and other internal sources. The last works were completed in August 2023. Not only do these LED replacements contribute to citywide CO<sub>2</sub>e savings, they also help improve the financial sustainability of sports and leisure facilities.



## Air quality

Poor air quality and inhalation of pollutants has negative impacts on everyone's health, with potentially serious consequences for vulnerable individuals, families and at a population level. As well as tiny particulates of air pollution, vehicles also emit carbon dioxide, a greenhouse gas which contributes to climate change.

A full review of air quality in the city was published in 2021 in the [Air Quality Annual Status Report](#). We are working towards increasing the amount of air pollution monitoring in Brighton & Hove with additional real-time sensors, some funded by the council's Carbon Neutral Fund. An [Air Quality Action Plan](#) was published in 2022, with actions to improve air quality by: increase active travel; encourage and support uptake of ultra-low and zero exhaust vehicles; monitoring and public awareness; reduce emissions from building, new developments, energy production and construction sites. Brighton & Hove Buses have invested in 54 hybrid buses which are powered by electricity and zero emission when they travel through the city centre and Air Quality Management Areas.

## **Energy**

The Council is working to reduce carbon emissions within its own corporate operations and property.

### **Corporate renewable electricity**

All the electricity purchased for the council's energy supply has been 100% covered by Renewable Energy Guarantees of Origin (REGOs) since April 2020. This allows the council to report our emissions as 'zero' under Scope 2 of the Greenhouse Gas protocol. However we still provide carbon emission figures alongside this. The supply of REGOs continues in 2023. This highlights the council's support for additional renewable generation capacity in the UK energy mix.

### **Energy efficiency and low carbon heat upgrades – Corporate estate**

Greenhouse gas emissions from energy consumed by the council's corporate estate (including civic offices, schools, social care buildings, etc.) fell 20% between 2020 and 2023, saving 1,495 tonnes CO<sub>2</sub>e. This reduction is owed to continued decarbonisation of the national electricity grid, and council interventions. To date the council has installed Solar PV systems across 10 corporate sites, generating 403,495 kWh of renewable electricity annually, saving £38,630 in electricity bills each year and an estimated 406.5 tonnes of CO<sub>2</sub>e over the next 20 years.

To date Solar PV systems have been installed across 9 school sites, generating 147,365 kWh renewable energy annually, saving £27,996 in electricity bills each year, and 148.5 tonnes of CO<sub>2</sub>e over the next 20 years.

The Solar PV Framework, facilitated by Community Energy providers BEC and BHESCo, is currently providing 20 schools with renewable energy. The total Solar PV installed to date has an annual generating capacity of 700,627 kWh, saving £66,221 in electricity bills each year and 705.8 tonnes of CO<sub>2</sub>e over the next 20 years.

Energy audits are underway beginning with the council's most energy-intensive buildings. These audits are needed to develop more detailed business cases that will provide a pipeline of energy efficiency projects ranked based on greenhouse gas emissions saved per pound of investment. A provisional list of projects, including both corporate and schools projects, has been worked up using high level business cases from recent energy audits.

Since 2021, carbon reduction projects related to the corporate estate have received an investment of more than £1.4m from the council's Carbon Neutral Fund. On 24 February 2022 Budget Council agreed to ring-fence an additional £3.5 million in funding from the council's £14 million Carbon Neutral Fund (2022 - 2024) to

decarbonise the council's estate. The Energy & Water Property Team at BHCC are also preparing bids for the next round of Government's Public Sector Decarbonisation Fund. Comprehensive energy audits of 20 schools have been prepared.

The council has also invested £100,000 from the Carbon Neutral Fund in measures to monitor and improve water efficiency. Improvements made to six sites in 2022/23 have resulted in an approximate daily saving of 49,000 litres per day, which is equivalent to a cost saving of £5,200 per month.

## **Hydrogen Sussex**

The council takes a leading role in [Hydrogen Sussex](#), the coordinating body working on practical and strategic projects with Greater Brighton and stakeholders to promote and support a hydrogen economy across the city-region. In July 2023 Hydrogen Sussex launched a Hydrogen Strategy for the region, highlighting the strengths in academic research and advanced engineering, and the ongoing work of Ricardo, Shoreham Port and Brighton & Hove Buses to generate and use hydrogen locally.

## **Waste**

### **Preventing waste and managing waste responsibly**

Long-term projects are being delivered through the 'managing waste responsibly' and waste minimisation projects to increase reuse, repair and recycling.

The council has banned single-use BBQs in public spaces such as the seafront and parks, with effect from July 2022. Fixed penalty notices can now be issued where offences occur.

On-the-go recycling has been installed along the city's seafronts and in some parks, including Wish Park and Stanmer Park. The council is developing plans to roll out further on-the-go recycling containers in city centre locations, as well as in more parks across the city.

A project in collaboration with Keep Britain Tidy is underway, focusing on student residents. The objective is to engage with a cohort of students not reached before in private rented accommodation to explore the barriers to waste management and recycling in Brighton & Hove and how this sits within a national picture.

In 2022/23 the council commissioned several in-person events on household recycling and food, electronic equipment and textile waste prevention, with funding from the EU Interreg BLUEPRINT to a Circular Economy project. This project also funded a 'Make Materials Matter' challenge on the BetterPoints app, which rewarded over 500 Brighton & Hove residents for their reuse, repair, share, upskilling, and recycling activities. The challenge was also used to share locally specific information for waste prevention, and to help residents discover and locate circular economy services near them (e.g. rental services, repair shops, and zero waste stores).

### **Composting**

Continuing to grow the community composting scheme: new schemes have been introduced at Bedford Square, Adelaide Crescent, Woodingdean, Queen's Park, Wish Park and Hollingdean Community Centre; 10 additional composters have been provided at existing sites; and 16 worn out composters have been replaced at existing sites. As of May 2023, there were 51 open schemes and 5 pending.

### **Reducing landfill**

The council has an exceptionally low amount of waste sent to landfill, just over 1%. The city's residual waste is sent to the energy recovery facility at Newhaven and generates electricity for 25,000 homes.

The council, in partnership with East Sussex County Council and Veolia, continues to explore options for introducing a food waste collection service and increasing the type of materials collected for recycling.

## **Built Environment**

### **New council housing**

The council has investigated and is undertaking two newbuild projects piloting Whole Life Carbon Assessments in new council homes to estimate and measure their impact on greenhouse gas emissions during construction and in use. This includes the award-winning Victoria Road housing development, completed in 2023 (Unlock Net Zero “Building/development of the year – housing association/local authority”). All new build council housing developments will undertake Whole Life Carbon Assessments, with four sites currently undertaking early-stage Whole Life Carbon emissions estimates as part of design development. One of the main outcomes will be homes with better insulation and low carbon heating systems. These high-quality new homes will cost more to build, but the new council tenants will benefit from lower energy bills.

BHCC’s updated New Homes Design Specification outlines the brief for building new council housing. It includes requirements for a circular economy evaluation to identify ways to reuse materials and avoid and reduce waste, and reusing materials at the end of their lifespan.

In September 2022 the council agreed the New Build Housing Sustainability [Policy](#), which sets ambitious targets for energy use, embodied carbon, and water use, following the RIBA 2030 Climate Challenge.

A landscape-led approach to projects will support incorporating Sustainable Urban Drainage Systems and meeting biodiversity net gains in developments. These changes will reduce habitat destruction and carbon emissions which are a consequence of construction.

### **Planning**

Brighton & Hove City Council’s planning policies promote sustainable buildings which are energy efficient and include renewable energy and biodiversity, supporting carbon neutral targets, within the limits of national planning advice. Carbon neutral new buildings are promoted with developers, architects and agents, raised in pre-application discussions to encourage consideration during early stages of the design process.

[City Plan Part Two](#) extends and strengthens existing planning policies for sustainable development and was adopted in October 2022. Key policies include:

- DM18 embed circular economy principles
- DM22 seeks retention of and planting of trees within landscape design
- DM33 promotes sustainable and active travel

- DM37 protects and enhances biodiversity including measurable Biodiversity Net Gain
- DM43 requires the design and layout of all new buildings, car parking and hard standing, to incorporate Sustainable Drainage Systems.
- DM44 strengthens requirements for energy efficiency and renewable energy
- DM45 encourages developers to seek community energy partners
- DM46 encourages developers to install low-carbon heat networks or communal heating systems

**City Plan Part One Review** (BHCC's main development planning policies) commenced in 2022 and is researching a new evidence base that will help to support strengthened requirements for energy efficiency, carbon emissions, circular economy and sustainability.

### **Planning Guidance**

New guidance on sustainability was created to supplement planning policies and BHCC's existing suite of guidance on topics such as biodiversity, swift boxes, and Sustainable Urban Drainage.

- [Biodiversity and Nature Conservation SPD](#) was adopted 2022. Sets out detailed guidance for achieving biodiversity improvement and Biodiversity Net Gain in new development.
- Interim guidance on [Heritage and Sustainability](#) published April 2022 sets out practical guidance for achieving sustainability measures where development impacts heritage assets.

### **Energy efficient homes**

#### **Council Housing**

At 2022, BHCC owned and managed over 11,000 domestic dwellings. Recognising the substantive retrofit potential of its own housing stock, BHCC is working towards its own target of achieving an average SAP rating between 81 (EPC B) and 92 (EPC A) by 2030. Improving the energy efficiency of housing is not only a necessary step towards carbon neutrality, it also helps to reduce tenants' energy bills, tackle fuel poverty and ill-health linked to cold homes, reduce maintenance & repairs costs, and strengthen local energy security.

A range of sustainability and energy projects are being carried out across council homes.

There has been significant investment in upgrading gas boilers to A-rated appliances and 99% are now A-rated. The council has also trialled the installation of Air Source Heat Pumps in some housing stock, replacing inefficient electric heating systems.

Solar panels have been installed on 400 council homes and the aim is to add panels to 1,000 more council homes over the next 3 years.

There have been improvements in the EPC ratings of our council homes and an energy plan will prioritise measures to improve properties with low energy performance ratings of D to F.

A new Sustainability and Energy team set up earlier this year in housing is working on these and other projects.

## **Private Housing**

Support for private households, tenants and landlords to make improvements to homes has continued throughout 2022-23 with a focus on vulnerable residents, tackling cold homes and high fuel bills.

- The Warm Safe Homes grant continues to support people and families in fuel poverty by providing energy efficiency measures to help manage energy bills and reduce emissions. The council made an extra £600,000 available for these grants in 2022, in addition to £400,000 agreed in 2021. The grant is available for homeowners and private tenants on low incomes to fund improvements such as cavity wall and loft insulation, installation of energy efficient windows and doors, more efficient heating and hot water systems, and installation of heat pumps, where appropriate.
- We worked with Brighton & Hove Energy Services Coop (BHESCO), to provide Home Energy Surveys that will provide specialist reports detailing a properties current energy state and suggested improvements. We continued to offer advice and the installation of small energy saving measures (via Brighton & Hove Energy Services Coop - BHESCO). Additional funding enabled us to expand the scheme into 2022-23.
- The national Local Energy Advice Partnership (LEAP) scheme provides a free advice service helping people keep warm and reduce their energy bills. Including installing free energy saving kit in homes, check eligibility for insulation or a new boiler, give practical advice on heating systems and saving energy and arrange free money advice
- Developing a new Brighton & Hove Warmer Homes Programme to help people carry out energy improvements to privately owned and rented housing in the city. Details of the scheme are still being finalised, but the proposal is for the programme to provide support for owner occupiers and private renters in homes with an Energy Performance Certificate (EPC) rating of D or below, and a household income of less than £30,000 a year.
- Following a successful bid for the governments 'Sustainable Warmth' competition to fund improvements to private sector homes for households with low income and low EPC rated homes the 'Warmer Homes consortium' was launched in May 2022, running throughout 2022-23.

support is available for eligible households to pay for energy improvements through a Warmer Homes consortium. This funding runs until March 2023, The Warmer Homes funding is particularly looking to help households living in low energy performance homes not heated by mains gas. This could mean that the home is heated by electricity, liquid petroleum gas (LPG), or heating oil. The funding aims to support homes that are heated with electric, LPG or oil by offering low-carbon energy alternatives, contributing to both the government's fuel poverty targets and the UK's commitment to meet the net zero target by 2050.

- Over 700 privately rented properties that fell below the Minimum Energy Efficiency Standards were identified in 2022. Property owners are initially being contacted with information, and an enforcement process will be followed if necessary.

### **Solar Together Sussex**

Solar Together is a group-buying scheme that delivers cheaper installation of solar panels and battery storage systems for able-to-pay households including home owners and landlords. It is managed by West Sussex County Council, working with agents iChoosr, on behalf of 9 councils in Sussex, including Brighton & Hove City Council. The registrations for the 3rd round of this scheme was open in April and May 2023. In this period, over 8,000 households and 186 SMEs registered interest in the scheme. Compared to previous rounds, we are seeing a higher percentage of customers opting to install a battery with their PV system.



## Environment, Biodiversity, Food, Agriculture

### Biodiversity

The Brighton & Hove Local [Biodiversity Action Plan](#) is the background of the City's important habitats and species. It forms the basis for work under the Environment Act 2021, such as developing a Local Nature Strategy/ Nature Recovery Network in partnership with a wide range of local organisations, mapping habitats and green spaces, and introducing measurable Biodiversity Net Gain planning [guidance](#).

### City Parks

The council continues to replace and extend tree cover in Brighton & Hove, whilst diversifying woodland to ensure the long-term sustainability of the city's tree stock (including a strategy to manage ash die-back) and maximise opportunities to increase biodiversity. In 2022/23, 70 street trees and 224 woodland trees were planted with funding from the council's Carbon Neutral Fund and the Forestry Commission Treescape Fund. The Carbon Neutral Funding will enable the planting of an additional 100-150 street trees and between 200 and 250 woodland/parks trees in 2023/24.

An additional £150,000 of Carbon Neutral Funding was made available to trial innovative street tree pit drainage systems in 2022 and 2023 to reduce local flood risk.

[Wilder Verges](#): The council is undertaking a three-year verge management pilot of reduced mowing for small, grass areas to manage them as natural green spaces to encourage biodiversity and nature. We are trialling changes to [verge management](#) through reduced cutting regimes, with safeguards for visibility and accessibility, and this has resulted in significant increases in biodiversity in these areas. There are also direct carbon savings from less machine usage, and benefits from increased vegetative structure to better absorb carbon and pollutants.

[Wilding Waterhall](#) is working to 'wild' a former Brighton & Hove City Council Golf Course, to restore fragile chalk grassland and improve habitats for multiple species whilst offering a unique opportunity for local residents and visitors to learn more about our internationally important local environment.

This project is being led by Brighton & Hove City Council working closely with many local groups such as The Friends of Waterhall. Wilding Waterhall is part of a bigger project across the South Downs called Changing Chalk, and has been awarded [National Lottery](#) funding to deliver the project over 4 years, alongside Countryside Stewardship funding from Defra and funding from the council's Carbon Neutral Fund. Wilding Waterhall is working with local volunteers to survey the site to create a biodiversity baseline. This will support site monitoring in the future by showing what positive or negative biodiversity impacts are caused by changes in management technique. 2023/24 works include continued restoration of species-rich grassland, the development of waymark trails, and the creation of a second dew pond.

### **Coastal habitat at Black Rock**

The council worked with environmental partners and local residents to improve and extend [coastal vegetated shingle habitat](#) at Black Rock in compensation for the loss of a Local Wildlife Site. Almost 1,000 young plants were grown by Kew Gardens Millennium Seed Bank at Wakehurst and include *Crambe maritima* (sea kale), *Glaucium flavum* (yellow-horned poppy) and *Solanum dulcamara* (bittersweet), and are now well established. Wildlife surveys of the area have recently identified a rare jumping spider for the first time in the UK.

### **City Downland Estate Plan (CDEP)**

The City Downland Estate is owned by the council and farmed by tenant farmers. The council's 100-year action plan, the City Downland Estate Plan was agreed in early 2023. The vision of the CDEP is *"A rejuvenated City Downland Estate [that] will be carbon negative and climate resilient, its biodiverse grassland landscape fully restored and teeming with wildlife. The estate will be a leader in sustainable farming, where local food production will flourish..."* Two key objectives are to reverse the loss of biodiversity on the estate, and to work towards (and beyond) carbon net zero.

The Downland Advisory Panel advises on the plan's implementation. This is made up of tenant farmers, stakeholder organisations (such as the Brighton and Hove Food Partnership, South Downs National Park Authority and Sussex Wildlife Trust) and community organisations such as the Brighton Downs Alliance, as well as councillors.

The council works closely with our tenant farmers, many of whom are in environmental stewardship, encouraging good farming practice which contributes to the council's carbon neutral target, in addition to improving biodiversity and ground water quality. The council has worked over the years with the South Downs National Park, Natural England, Southern Water, the University of Brighton, the Environment Agency, and other organisations, farmers and stakeholders in groundwater projects, particularly The Aquifer Partnership, seeking to reduce nitrate and ammonia inputs and encourage sustainable farming practices.

### **Soil health and carbon sequestration**

The council continues to explore measures for protecting and enhancing biodiversity, working towards restoring depleted soils, species-rich chalk grassland landscapes and natural farming methods, alongside carbon capture and carbon neutrality.

Alongside this, the council is working to reduce chemical inputs into the environment and has already phased out pesticide use on all public land looked after by our environment and housing teams, except for high-risk invasive species with no effective alternative.



## **The Living Coast**

[The Living Coast](#) Biosphere brings partners together from across the region to enable sustainable and innovative socio-economic development, with a focus on restoring and enhancing the resilience of our natural environment, nature connection and awareness. The natural environment provides all the resources required for all life to thrive and is the springboard for all human activity. The Biosphere partnership continued to deliver a programme of sustainability and cultural actions as well as preparing our formal application to UNESCO to be redesignated as a World Biosphere Region in 2024.

## **Food**

Brighton & Hove City Council is working towards a healthier, more sustainable food system; one which reduces food poverty, supports local food businesses and reduces the environmental impact of the way in which we produce, consume and dispose of our food.

The council has an extensive [programme](#) of sustainable food actions together with the Brighton & Hove Food Partnership (BHFP). This supports a collaborative and city-wide effort to create a healthy, sustainable, and fair food system, and to use food to bring together community, farming and environmental interests on land management.

A wide range of activities took place in 2022, with our strong networks of organisations collaborating in the city-wide effort, with campaigns for a more plant-based diet, less single-use plastics, reducing food waste and increasing local food growing, and tackling food poverty. [Brighton & Hove Food Strategy Action Plan 2018 to 2023](#) combines the ecological transition with social justice. In 2022 there was a particular emphasis on the cost-of-living crisis and emergency food provision.

Brighton & Hove City Council's [Good Food Standards](#) are the council's standards for purchasing food and catering services. They are applied to all food and catering contracts and concessions. Property and estates, nurseries, schools and events are providing monitoring information.

In 2022 the Greater Brighton Economic Board approved a report investigating existing policy and partnerships in the Greater Brighton city region. The next phase of the work will be to explore how partners can coordinate action and progress on a fairer food system, collaborating with businesses, education and food partnerships, and creating investment plans.

## **Land Use Plus**

Brighton & Hove Food Partnership were successful with their funding application to the Esme Fairbairn Foundation, for the '[Land Use Plus](#)' project. As well as working with the council on the City Downland Estate Plan, the Land Use Plus project will explore landscape scale nature friendly agriculture on the chalk grassland surrounding Brighton & Hove, help farmers find local routes to market and improve access to local food in the area for all.

## **Food Waste**

The Brighton & Hove Food Partnership includes Community Composting, Surplus Food Network and Flavour projects, who are pioneers in reducing food waste.

The [Surplus Food Network](#) is an ever-growing alliance of organisations tackling food waste by working with suppliers to distribute surplus to people in need in Brighton, Hove and surrounding areas. Membership of the network includes FareShare Sussex, the Real Junk Food Project Brighton, Sussex Homeless Support, the Sussex Gleaning Network, UKHarvest and is coordinated by Brighton & Hove Food Partnership. The Network saved 1,982 tonnes of food from being wasted in 2022, feeding over 5,000 people a week and saving 7,493 tonnes of CO<sub>2</sub>e emissions.

[Sussex Surplus](#) is a pilot social enterprise from the charity Feedback taking fresh and surplus food in danger of being wasted and transforming it into long-life products and tasty meals that can then be sold wholesale to independent shops.

## **Food Use Places**

A successful bid to the National Lottery Climate Action Fund supports the [Food Use Places](#) project which began in 2022 in 12 community locations in Brighton. The vision of Food Use Places is to become champions of food use rather than places that manage food waste. It brings together circular economy and community approaches to reduce food and packaging waste and increase composting.

## **Communication and engagement**

The climate and biodiversity emergency is interlinked with the everyday concerns of people in the city – from the cost of energy, food and travel, to clean air and the power of nature to improve wellbeing.

There is a wealth of positive action happening, led and co-ordinated by communities, businesses and individuals in the city. We want to build on this work, capture its impact and bring a more strategic and focussed approach to communications and engagement, to accelerate change. The Communications and Engagement Strategy outlines the approach we'll take as a council to communicate and engage the city on climate action. The council's

During 2022 the council took part in UK100's national Local Climate Engagement coaching programme. The council puts this training into practice on the co-design of projects to engage on climate and biodiversity.

## **Encouraging sustainable travel**

### **School Streets**

Brighton & Hove is delivering a city-wide School Streets programme to all eligible infant, primary and junior schools. [School Streets](#) support the safe movement of children and families travelling to and from school by creating an environment that enables and encourages more walking, wheeling, cycling and scooting.

The School Streets programme aims to implement schemes at 3-6 school site per year, with strong community support. The latest School Street was introduced at Aldrington CE Primary in May 2023, bringing the total count of School Streets in operation to ten, with two more projected to launch in September 2023.

The council actively seeks opportunities to enhance biodiversity within School Street schemes. In coordination with the council's Our City Our World programme, pupils at [Westdene Primary School](#) renamed a newly created wildlife area 'Westdene Mini South Downs'. The pupils designed beautiful artwork for the information board, and helped plant out over 100 native, locally-sourced chalk plants on World Soil Day. The newly reclaimed area, which was previously tarmacked roadway, has had a chalk bank, and stag beetle loggery created, alongside trees planted following the introduction of the Schools Streets scheme. The area now provides habitats and homes to help support insects and wildlife, as well as be a new space for local residents and the school to enjoy and learn from all year round.

### **Move for Change**

'Move for Change', powered by the BetterPoints app, launched in 2021 to encourage and reward residents and employees for walking, cycling, and using public transport. Residents and commuters to Brighton & Hove can earn points to be redeemed for

discounts and vouchers at local shops. They can also be donated to support local charities.

The Better Points dashboard provides the carbon emissions avoided by users taking part in the Move for Change challenge. At June 2023, 3,883 people were taking part in the challenge. They have travelled 9,006,430 miles using sustainable travel modes and avoided 905 tonnes of CO<sub>2</sub>e.

Move for Change offered extra points for [Car Free Day 2022](#) and a prize draw. Other Car Free Day events included an eCargo exhibition event, School Streets taster session, free Coastal Biodiversity Healthwalk, free Dr Bike repairs, library exhibitions on active travel, and free bus travel to the Downs on the 'Breeze Buses', which resulted in a doubling of passenger numbers.

### **Engaging staff and teams across the council**

In 2022 the council launched climate e-learning for staff and intensive Carbon Literacy® training for senior managers and are inviting them to make personal action plans to tackle the climate and biodiversity emergency at work. As of 06 July 2023, 1082 staff had completed the trainings, with excellent feedback. The trainings continue to be delivered in 2023.

In 2023 the council ran two Circular Economy trainings for senior managers and a Circular Economy specification-writing masterclass for council buyers and commissioners working in housing construction and maintenance to reduce the resource- and carbon-intensity of council services.

As well as publishing regular news updates and information pages (e.g. sustainable hybrid working guidance) through the intranet and internal bulletins, the council created an open forum using Microsoft Teams for people in the council to share ideas, experiences, news, training and events about what they can do to tackle the climate and biodiversity emergency at work. The council also made the Ecosia sustainable search engine available for employees to use.

Taken together, these actions are helping raise awareness and promote climate action at work, both on an individual and project level.

## **Jobs, Education & Skills**

The education sector and young people are vital partners and have a long-term commitment to climate education and sustainability.

### **Environmental education in schools – Our City Our World**

The Our City Our World schools programme has been co-developed with schools through engagement events with headteachers, governors, lead teachers and business managers. Over the last year, 47 of the city's schools have been involved in the programme. Brighton & Hove is the first local authority to develop a wholistic climate change programme for schools and this is receiving much interest locally and nationally.

Climate actions from schools 2022-23 include:

- (i) Increased knowledge of climate change through integration of key knowledge and skills into all curriculum areas;
- (ii) Biodiversity - Rewilding school grounds, developing a pollinator network throughout the city, training teachers in outdoor learning;
- (iii) Water - Completion of 2 SuDs in Schools schemes with additional 2 proposed;
- (iv) Waste - Waste reduction through a refill shop pilot at a primary school (<https://www.ourcityourworld.co.uk/news/refill-shop-opens-at-goldstone-primary/>), clothes and other item exchanges, and delivery of the 10-week Circular Economy module (see BLUEPRINT update below);
- (v) Energy - Solar or Schools; Use of Energy Sparks to identify;
- (vi) Food – food waste audits and trial of in-vessel composting, enabling the composting of raw and cooked food on-site
- (vii) Transport – priority of local school trips using sustainable transport, school trips by bike, bike train energy reduction opportunities.

During the 2022/23 academic year, B&H schools also benefited from a Circular Economy schools pilot, part of the EDRF-funded 'BLUEPRINT to a Circular Economy' project. In the first phase of the pilot, participating schools learned about the relevance of circular approaches for supporting climate action through workshops covering specific materials and waste streams with dedicated input from city circular experts – see this [video](#) summary.

In the [second phase](#) of the Circular Economy schools pilot, a local Circular Economy expert created a 10-week online module with educational content tailored to Brighton & Hove, to give pupils the opportunity to learn about the Circular Economy already active in their city.

## **Further Education, Skills & Jobs**

### **Local Skills Improvement Plan**



The Sussex Chamber of Commerce's [Local Skills Improvement Plan](#) is working across East and West Sussex and the city of Brighton & Hove, to become a focal point for innovative education and skills development. It will identify green jobs, including non-green jobs in green industries (for example an accountant working for a wind farm) and green jobs in non-green industries. Together these provide valuable information for recruitment, businesses, education providers and careers support.

### **Green apprenticeships**

The council's Pre-employment and Apprenticeship Manager will identify and monitor green apprenticeships. Current apprenticeships will be enhanced to ensure that they meet the needs of the employers within the growing green economy. New apprenticeships will be created to reflect new occupations to meet the challenge to reach net carbon zero.

### **Greener Sussex – skills development**

FE Sussex, a collaborative partnership between eight Sussex further education colleges, was awarded £7m Department for Education Strategic Development Funding for [Greener Sussex](#) to improve green industry, technology and skills locally. Greener Sussex is investing more than £7M in new learning resources, staff training, employer updating and student awareness raising across Sussex. The project comprises five strands, two of which are managed by colleges in Brighton & Hove:

- Carbon Literacy - Brighton, Hove & Sussex Sixth Form College ([BHASVIC](#)) –
- [Electric Vehicle Technologies](#) - Greater Brighton Metropolitan College – six hybrid and electric vehicle technology training centres of excellence across Sussex.
- Alternative Energies & Hydrogen Technologies - Chichester College
- Decarbonisation Academies - East Sussex College Group
- Zero Carbon Land Management - Plumpton College



## **Circular Economy**

Transitioning to a circular economy is a key part of the solution to tackle climate change as 45% of global greenhouse gas emissions come from the extraction, processing and production of goods and growing food. It also tackles the biodiversity crisis, as keeping products and materials in use for longer reduces the need for newly mined materials, a major cause of global habitat loss.

### **Circular Economy Routemap and Action Plan**

The [Circular Economy](#) Routemap and Action Plan were approved by the Policy & Resources Committee in May 2022. Progress against specific deliverables is monitored by an advisory Oversight Board, which includes representatives from the University of Brighton and Sussex University, Circular Brighton & Hove, Greater Brighton and the city's Economic Partnership.

## **Adapting to climate change**

Climate adaptation is about managing or avoiding the risks that climate change will bring. The most significant climate hazards faced by Brighton & Hove are biodiversity loss linking directly to food security; heat stress; drought and water stress; urban and coastal flooding; storms and heavy precipitation; air, soil and water pollution. Brighton & Hove is already experiencing more heatwaves, wetter winters and windier conditions.

### Climate Risk and Vulnerability Assessment

A Climate Risk and Vulnerability Assessment was commissioned in 2022-23. This will report in Autumn 2023 and provide a baseline assessment to identify the areas and communities of the city most vulnerable to the impacts of climate change and where methods of adaptation would be best implemented.

To prepare for extreme weather, the council's civil contingencies team produces a major incident plan which is reviewed annually.

### Protection against coastal erosion and flood risk

As the coast protection authority, Brighton & Hove City Council has adopted the Brighton Marina to River Adur Flood and Coastal Erosion Risk Management [Strategy](#) to provide protection for the next 100 years.

In partnership with Adur District Council and Shoreham Port Authority, the scheme is being paid for from a series of centrally funded packages set out by the Government, to construct new flood and coastal defences. The scheme is repairing and strengthening floods walls and defences where necessary and installing some new timber groynes.

### Groundwater and surface water flooding

In 2021 the City Council, as Lead Local Flood Authority, commissioned a Local Flood Risk Management Strategy and a Surface Water Management Plan. These plans identify locations where flooding is of concern. The next step is a feasibility study to look at the most appropriate measures to manage flood risk. Carbon emissions will be considered in the feasibility study as part of the option appraisal process.

### Sustainable Urban Drainage (SUDs)

In 2024 the council will deliver a sustainable drainage implementation plan to supplement surface water management activities to protect the properties and businesses of the city from surface water and extreme weather events, reduce contamination of the city's aquifer, and create habitats that enhance local biodiversity.

To date, the council has invested £240,000 from the Carbon Neutral Fund to realise Sustainable Urban Drainage Systems (SuDS) across four sites in Brighton & Hove

(Preston Park, Eldred Avenue, Norton Road and Wild Park). This internal investment was leveraged to attract external funding from Highways England and the Environment Agency to cover development costs.

Like the other three schemes, the SuDS scheme at Wild Park will create an attractive natural landscape. It will be designed around several shallow planted basins – or ‘rainscapes’ - that can hold water during heavy rainfall, and which help to reduce pollution and improve the area for people and nature. The Wild Park Rainscape will be linked to a rainscape project in Moulsecoomb Primary School.

The project was initiated by [TAP](#), a partnership between the South Downs National Park Authority, the Environment Agency, Southern Water and Brighton & Hove City Council, working together with the Brighton and Lewes Downs UNESCO Biosphere (The Living Coast) to protect the aquifer, which is the source of all our drinking water in the city.

#### Carden Avenue SUDs

The design for the Carden Avenue SUDs scheme mimics natural systems in which gravity and landform remove excess rainwater flow to reduce the risk of flooding to affected properties and contamination of the city’s aquifer. The project was part-funded through a Interreg 2 Seas programme (SCAPE). Construction works on Phase 1 were completed in 2020 and Phase 2 completed in 2022. This approach has been successful in storing excess run-off and diverting it away from vulnerable properties.

## Carbon Offsetting

Brighton & Hove City Council recognises that offsetting carbon emissions is likely necessary to meet our carbon target, ideally nature-based solutions like habitat restoration, tree planting and woodland creation. We want to make sure that the local environment and communities benefit from any offsetting investment aligning to restore biodiversity and overlapping with nature's recovery – so we seek solutions within the council's geographical boundary or supply chain. The council does not purchase any carbon offset credits and there is at present no offsetting framework that we recommend to local businesses and developers.

In 2022, the council investigated the carbon-saving potential of projects funded by the Carbon Neutral Fund. We completed a detailed study of carbon savings from project including renewable energy for our parks equipment and vehicles, efficient LED lighting in sports facilities, and low-carbon restoration of failing road surfaces. Sussex Local Nature Partnership is also investigating the potential of natural habitats for carbon sequestration.

Brighton & Hove City Council is considering the potential of [Authority-Based Insetting](#) – an alternative to traditional offsetting. This framework aims to make more carbon removal projects happen locally; to enable better reporting of carbon reduction; to provide financial incentives and increase collaboration. This framework may be more of an engagement tool than a way of stimulating large-scale investment.

The Sussex Kelp Restoration Project may hold some exciting opportunities for carbon sequestration. At this stage there is still much research being undertaken to further our understanding on its importance and potential, and its wider role in adapting to climate change.

## Procurement

The goods and services that the council procures from contractors and suppliers are likely to be the largest part of our corporate carbon footprint. Although the council cannot directly control emissions and environmental actions by suppliers and contractors, we can influence this through our procurement policies.

Following committee approval in 2022, the council is using a new Environmentally Sustainable procurement policy to maximise positive outcomes from our contracts. Collaborating with Orbis partners East Sussex and Surrey County Council, the new policy focuses on 4 areas: 'Climate Change Mitigation and Adaptation', 'Prevention of Pollution', 'Sustainable Resource Use and Consumption' and 'Protection of Biodiversity'. This policy gives the council's suppliers the information they need to meet our 2030 Carbon Neutral requirements. It ensures environmental sustainability is embedded at the earliest stages of commissioning and procurement decision making. It also sets out a robust approach to data collection and reporting of supplier emissions throughout supply chains.

Progress to date:

- Environmentally Sustainable Procurement Policy agreed across Orbis partners, supporting commissioners to include carbon emission reduction and social value requirements in tender documents
- New specification-writing tool developed to strengthen environmentally sustainable requirements included in our tenders.
- Circular Economy specification-writing masterclass delivered to built environment contract managers, buyers and commissioners.

## **Financing climate action**

### **Capital funding and grant funding**

The majority of the council's financing for actions in the 2030 Carbon Neutral Programme are sourced from general capital and revenue funding – for example improving energy efficiency in our council housing.

The council also actively applies for significant sums from external grant funding; recent successful awards include:

- Electric Vehicle chargepoints (Office for Zero Emission Vehicles)
- Local Climate Engagement coaching (UK100)

### **Brighton & Hove City Council's Carbon Neutral Fund**

The council has allocated capital funding for the [Carbon Neutral Fund](#) which supports in-house projects that advance the strategic objectives of the 2030 Carbon Neutral Programme: reducing greenhouse gas emissions, enhancing biodiversity, and adapting to climate change. At [March 2023](#) over £20 million had been allocated to projects and a rigorous assessment of carbon savings from the projects carried out. This Annual Report notes where projects were funded by the Carbon Neutral Fund.

### **Pension fund**

The city council's pension fund is managed by East Sussex County Council Pension Board. The East Sussex Pension Fund now reports annually on its exposure to fossil fuel investments and considers the risks to its investment from the effects of climate change.

# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 28

**Subject:** Hanover & Tarner Liveable Neighbourhood Pilot Project

**Date of meeting:** 3 October 2023

**Report of:** Executive Director – Economy, Environment & Culture

**Contact Officer:** Name: Andrew Renaut  
Tel: 01273 292477  
Email: andrew.renaut@brighton-hove.gov.uk

**Ward(s) affected:** Hanover & Elm Grove, Queen's Park

### For general release

#### 1. Purpose of the report and policy context

- 1.1 Following an initial decision by the former Environment, Transport & Sustainability [ETS] Committee in 2020 in response to a deputation, work was undertaken to develop a pilot Liveable Neighbourhood (also known as a Low Traffic Neighbourhood) for the Hanover & Tarner area. Community engagement and technical assessment and design helped to shape concept proposals and a preferred option was agreed for consultation by the committee in 2022. The consultation followed and further engagement on the boundary roads took place in early 2023. Since then, there have been a number of decisions made regarding funding for the project.
- 1.2 This report sets out the results of the consultation and engagement processes and proposes that work on the project ceases; identifies some measures within the original study area that can be progressed; and proposes further actions in relation to the funding allocation that was made for the project.

#### 2. Recommendations

- 2.1 That Committee agrees to note the outcomes of the consultation that has been undertaken for the preferred option for the pilot Hanover & Tarner Liveable Neighbourhood area, which indicate that the proposals do not have the full support of local residents.
- 2.2 That Committee agrees to cease work on a pilot Liveable Neighbourhood project in the Hanover & Tarner area.
- 2.3 That Committee requests that previously agreed priorities to improve pedestrian crossing facilities in Elm Grove at Hampden Road/de Montfort Road and Bonchurch Road are developed and delivered at the earliest opportunity, subject to the approval of recommendation 2.6.

- 2.4 That Committee requests that officers undertake the development and delivery of designs to upgrade the Elm Grove/Queen's Park Road junction as part of the council's programme for upgrading the city's traffic signals, at the earliest opportunity, subject to the approval of recommendation 2.6.
- 2.5 That Committee requests that officers assess the existing crossing point at the Queen's Park Road/Egremont Place/West Drive junction, and the possible introduction of vehicle activated speed signs in Queen's Park Road as part of the council's Safer, Better Streets prioritisation framework, at the earliest opportunity.
- 2.6 That Committee requests that officers seek the necessary approvals from the Strategy, Finance and City Regeneration Committee to reallocate £400,000 from the £1.0 million budget allocation previously made to the Hanover & Tarner Liveable Neighbourhood pilot project from the Carbon Neutral Fund, to the Local Transport Plan capital programme to enable the work referred to in recommendations 2.3 and 2.4 of this report to be commenced.

### **3. Context and background information**

#### Development of proposals

- 3.1 Following a report to the former ETS Committee in March 2021, and feedback received from engagement with local communities in October 2021 and March/April 2022, the Committee agreed in June 2022 to undertake public consultation on a preferred option for the wider, pilot Liveable Neighbourhood study area, including Elm Grove, Queen's Park Road and Egremont Place, which formed the northern and eastern boundaries to the study area. The proposals were primarily designed to make the core area less permeable to motorised, 'through' traffic (often referred to as 'rat running') and encourage greater use of active travel for some journeys and more social use of streets by the local community.

#### Consultation and engagement outcomes

- 3.2 The consultation took place over a 9-week period between July and September 2022. The consultation methods and distribution of material are explained in Appendix 1 of this report as part of the full analysis of the feedback to the consultation is also set out in Appendix 1. The headline results from the survey showed that a total of over 1,200 responses were received from nearly 1,100 individual households.
- 3.3 Appendix 1 shows that almost 3,900 comments were received, and a number of themes were identified as part of the analysis. Most were related to concerns about the displacement of traffic onto particular roads such as Elm Grove, Queen's Park Road/Egremont Place and Bentham Road, and the potential associated impacts such as longer journey times and difficulties accessing properties and parking, and increased emissions. These were reflected in comments made by residents and businesses.
- 3.4 Comments were also made that generally supported the proposals or particular elements of them, including more speed reduction and



enforcement measures, greening/planting, and cycle parking/hangars or that changes should be made to remove pavement parking or reduce parking. However, these were outweighed by the number of overall concerns and issues that were raised.

- 3.5 In response to the consultation feedback, some further initial redesign work was undertaken. This included removal or changes to some of the proposed filters designed to restrict vehicle flows through the core area, and retaining the existing direction of flow in a number of streets. A number of the proposed measures also had implications for the number of parking spaces that may be removed, and therefore the implications of this for residents' parking and income were being reviewed. In addition, further consideration was required of the location and form of potential additional greening/planting within the area to ensure that it was sufficient to provide benefits and would be able to be provided and maintained within existing budgets, or through agreements with local community groups.
- 3.6 Technical work to assess the changes to proposals involved some indicative modelling in order to help understand the possible initial effects of the wider Liveable Neighbourhood measures on traffic flows. This work included assessments of a number of junctions bordering the project area, including the A23/Edward Street, which is also part of the Valley Gardens Phase 3 scheme, and A270/Elm Grove junction. This work indicated there would be some significant delays to traffic, including bus movements, at peak times.
- 3.7 The consultation proposals included potential opportunities for various permanent measures on the boundary roads as part of the overall scheme. These reflected priorities that local residents had identified through a survey, and also included two crossing locations on Elm Grove which had already been prioritised for delivery by the ETS Committee in November 2022 as part of a separate assessment of citywide requests. These are at the junctions of Hampden Road/De Montfort Road, and Bonchurch Road. The need to upgrade the Elm Grove/Queen's Park Road junction was also identified due to ageing equipment.
- 3.8 Further design work and engagement was undertaken on proposals for the boundary roads. This involved four online and in-person sessions at St Luke's and Elm Grove primary schools in February 2023. These were attended by approximately 80 people in total and provided a number of comments and suggestions, as set out in Appendix 3 of this report. These included more pedestrian crossings, a review of the pedestrian crossing point at Egremont Place/Queen's Park Road/West Drive, support for improvements to the Queen's Park Road/Elm Grove junction to address safety concerns, vehicle-activated flashing speed signs, and potential greening and tree planting (although there was concern about the potential loss of parking due to proposed tree planting), bike hangars and greater accessibility and shelters at bus stops.

#### Funding allocations

- 3.9 Several decisions have been made about funding allocations in relation to the pilot Liveable Neighbourhood for the Hanover & Tarner area. These are

detailed in Appendix 2 of this report and have included decisions made at Budget meetings of Full Council and by the ETS and Policy & Resources [P&R] committees. These involved addressing increased, estimated scheme costs to deliver a comprehensive, pilot scheme and then the reallocation of funds to other projects.

- 3.10 At this point, the further work that was being undertaken following the consultation and engagement on the proposals was stopped. A further committee decision in March 2023 then allocated £1.0m in principle from the CNF to a scheme that had 'buy-in' from residents, subject to further reports to committees.

#### **4. Analysis and consideration of alternative options**

- 4.1 The preferred option that was published for consultation reflected a significant amount of the feedback that had been received through previous engagement and consultation on options, alongside the technical design that would enable a Liveable Neighbourhood to achieve stated objectives.
- 4.2 The progression of some measures in the area that have already been agreed (two pedestrian crossing points on Elm Grove) and identified as being required as part of other investment programmes (upgrading the Elm Grove/Queen's Park Road traffic signals) is recommended. Requests for other measures that residents wish to propose via their ward councillors can be considered through the council's Safer, Better Streets framework.
- 4.3 Elm Grove has also already benefitted from the successful introduction of a pavement parking ban and there may be future potential to consider greening of the existing tarmacked verges or SuDS (sustainable drainage system) proposals to reduce surface runoff and downstream impacts at some point in the future if funding becomes available.

#### **5. Community engagement and consultation**

- 5.1 There has been extensive consultation and engagement during the development of the Liveable Neighbourhood proposals for the Hanover & Tarner area. The particular approach and outcomes of the work that was carried out during the summer last year and the further engagement that has been carried out in early 2023 are summarised in section 3 of this report.
- 5.2 Discussions also took place with a number of groups of stakeholders including bus and taxi operators, and emergency services to inform the development of the proposals.

#### **6. Conclusion**

- 6.1 The consultation results indicate that there were considerable local concerns about the potential effects of the measures, especially regarding the displacement of traffic onto other roads in the area, and the impacts on local access. Concerns were also raised about the possibility of increased danger around schools and nurseries. The consultation has therefore not

shown overriding support for the scheme, as was sought in the committee decision made in March 2023, which refers to a scheme which has 'buy-in from residents'. Technical analysis also indicated that delays would be likely on key routes.

- 6.2 In overall terms, it is therefore not considered appropriate to continue with the development of the scheme, but that some planned and prioritised measures in Elm Grove are delivered, and that some measures in Queen's Park Road are assessed within the council's Safer, Better Streets prioritisation framework.
- 6.3 Other measures that residents wish to see implemented in the local area can be requested and reviewed through the council's Safer, Better Streets prioritisation framework. These would be considered alongside other requests from across the city. These requests should be raised with ward councillors and further advice about how to do this is available on the road safety pages of the council's website.

## **7. Financial implications**

- 7.1 A summary of the budgetary decisions that have been made for the Liveable Neighbourhood project is included in section 3 of this report, and explained more fully in Appendix 2.
- 7.2 Expenditure to date specifically on this initiative has been limited to use of the original £300,000 budget that was allocated from within the council's approved Local Transport Plan (LTP) capital programme.
- 7.3 If this committee decides not to progress the Liveable Neighbourhood project, further consideration will need to be given to the previous decision of the former P&R committee regarding the in principle allocation of the £1.0 million to the project. This sum is currently ringfenced to support Carbon Neutral Fund schemes. It is understood that the cost of the two pedestrian crossing locations and the upgrade to the Elm Grove/Queen's Park Road junction could be approximately £400,000. It is proposed that this sum is therefore transferred to the LTP capital programme. This change in funding would need to be agreed by the Strategy, Finance and City Regeneration [SFCR] Committee either through TBM (Targeted Budget Management) Reports or directly as an independent report.

Name of finance officer consulted: Rob Allen      Date consulted: 06/09/23

## **8. Legal implications**

- 8.1 There are no direct legal implications associated with this report, but the requirement to revert to the Strategy, Finance and City Regeneration Committee for any reallocation of monies is noted.

Name of lawyer consulted: Katie Kam      Date consulted: 05/09/23

## **9. Equalities implications**

- 9.1 An Accessibility Audit of the area was conducted by Possability People's Get Involved Group to help inform the pilot project. A draft Equalities Impact Assessment was also completed.
- 9.2 Designs for the two proposed crossing points and traffic signal junction upgrade will include appropriate levels of assessment to ensure that the infrastructure is designed in line with national guidance which addresses accessibility/mobility and provision for vulnerable road users.

## **10. Sustainability implications**

- 10.1 The pilot Liveable Neighbourhood project was consistent with the aims and objectives of the council's Carbon Neutral Programme, and the priority identified by the Climate Assembly of creating low traffic/pedestrianised communities. However, the results of the consultation with the local community indicated that the preferred option for the scheme was not supported.

## **11. Other Implications**

### **Social Value and procurement implications**

- 11.1 There are no direct social value or procurement implications associated with the recommendations of this report.

### **Crime & disorder implications:**

- 11.2 There are no direct crime and disorder implications associated with the recommendations of this report.

### **Public health implications:**

- 11.3 There are no direct public health implications associated with the recommendations of this report.

## **Supporting Documentation**

### **1. Appendices**

- 1. Results of public consultation (July – September 2022)
- 2. Summary of funding decisions
- 3. Elm Grove/Queen's Park Road/Egremont Place boundary roads engagement feedback summary – February 2023

### **2. Background documents**

- 1. Liveable Neighbourhood Pilot Project (Hanover & Tarner) report and minutes – ETS Committee:Agenda Item 13 (June 2022)

2. Pedestrian Crossing Priority Programme report and minutes – ETS Committee:Agenda Item 51 (November 2022)
3. Safer, Better Streets - Infrastructure Priority Framework report and minutes – ETS Committee Agenda Item 67 (January 2023)
4. General Fund Revenue Budget, Capital & Treasury Management Strategy 2023/24 report and minutes - Budget Council:Agenda Item 91 (February 2023)
5. Carbon Neutral 2030 Programme – Carbon Neutral Fund report and minutes – P&R Committee:Agenda Item 140 (March 2023)



### **Hanover and Tarner Liveable Neighbourhood**

### **Public Consultation July to September 2022**

#### **Introduction**

This report outlines the results from a third stage of consultation and engagement for a proposed Liveable Neighbourhood scheme in the Hanover and Tarner area of the city. The first stage took place in October / November 2021, in the form of a mapping exercise using the council's 'Climate Conversations' engagement platform hosted on 'Bang the Table' software. 'Pins' were placed on an online map to show where respondents would like to see certain features in the area eg a pocket park or where there are problems with rat running. Feedback from the 'Bang the Table' exercise was used to develop proposals.

The second stage of engagement took place in March / April 2022, which consisted of five in-person workshops where attendees were able to review two draft concept designs and ask questions of officers in attendance. There was also the option to access the information online and complete the workshop questionnaire, whilst viewing the draft Liveable Neighbourhood concepts, through the council's 'Climate Conversations' engagement website.

The proposals were then refined based on feedback from the workshops to produce the plans for this third stage, which involved a public consultation exercise. The methodology and results from this are detailed in this report.

#### **Headline Results**

- 94.9% of respondents walk more than once a week compared to 68.3% who drive and 32.1% who cycle.
- The highest numbers of respondents live towards the west of the proposed scheme area (16-45%). Lowest response rates were mainly on the boundary roads of Queen's Park Road and Elm Grove and also in the south-west of the scheme area (Tarner Area) (0-25%).

- Respondents who state that they have a disability<sup>1</sup> perceive it to be more difficult<sup>2</sup> to get around the area (52%) than those who state that they don't have a disability (21.8%).
- During the day, only 6.3% of respondents feel unsafe or very unsafe when walking or wheeling but this rises to 15.6% at night. The most common reason stated for this is anti-social behaviour and drug dealing.
- There is not a wide variation between cyclists in terms of feeling unsafe or very unsafe during the day or at night (11.8% v 13%). Reasons given are related to driver behaviour and volume of traffic.
- 408 respondents independently<sup>3</sup> said that a bus gate is not wanted or needed in the area
- 1092 respondents (89.6%) made comments on the proposed designs.
- Most comments were related to concerns about displacement of traffic (590). Highest locations stated were Elm Grove, Queen's Park Road and Bentham Road
- Comments about access restrictions were second highest (405)
- 186 respondents said that the area could become more dangerous, mostly relating to areas around, and journeys to and from, schools and nurseries
- 62.2% of respondents said that this is the first time they had heard about the scheme

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<sup>1</sup> Respondents who answered 'Yes, a little' or 'Yes, a lot' in answer to the question 'Are your day-to-day activities limited because of a health issue or disability which has lasted, or is expected to last, at least 12 months?'

<sup>2</sup> Difficult or very difficult

<sup>3</sup> A question 'Do you want a bus gate in the area?' was not asked



## Methodology

The public consultation ran from 4 July to 11 September 2022.

Information packs were posted to 6,577 addresses in roads within the proposed Liveable Neighbourhood area, including boundary roads. In addition, 10,846 postcards were sent to a wider area around the proposed scheme:

In both cases, respondents were invited to complete a survey online. An email address and an answerphone message were available to request paper copies of the questionnaire (also in large print) and to enquire about a translation service. The consultation was also promoted by the council's Communications team using the council website and social media campaigns.

During the consultation period 6 drop-in sessions were also held where residents could view the proposals and speak to officers. These took place at the Phoenix Art Space and the Hanover Community Centre.

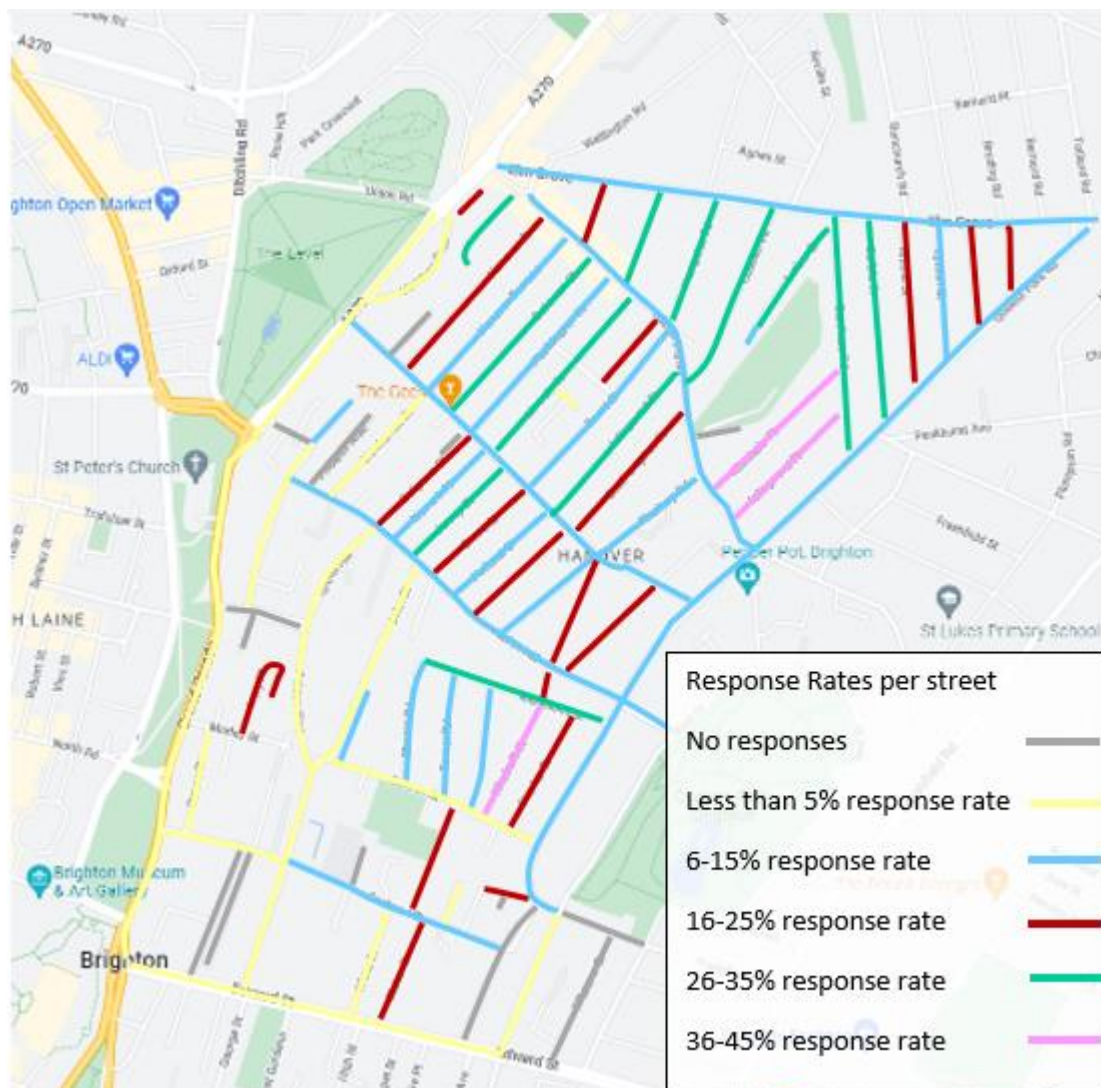
Households receiving information packs		Households receiving postcards		All households who received information by post	
Responses	Response rate %	Responses	Response rate %	Response	Response rate %
906	13.8	253	2.3	1159	6.7

Overall, the response rate from households who received promotional materials by post was 6.7%.

In total, 1218 responses came from 1055 individual households, with multiple members of many households making individual submissions. 59 of these responses were received from outside the areas who were sent information in the mail out.

As context in relation to other consultations, for the Valley Gardens phase 3 project the number of public consultation responses received was 463.

The map below shows the response rates from streets within the leaflet mailout area.



Of the 1159 respondents within the mailout areas, 759 (65.5%) said that they heard about the consultation via the information leaflet or postcard that they had received.

51 invalid responses were removed from the final results: 40 were duplicate responses from the same person and 11 were removed as they provided an incomplete or incorrect name and/or address which was stated as a requirement within the survey.

The first set of questions are designed to be used for monitoring mode of travel changes and perceptions of safety in the area if a scheme is implemented.<sup>4</sup> The second set of questions ask respondents for their opinion on a Bus Gate on Southover Street and also for comments on the proposals<sup>5</sup>

<sup>4</sup> Pages 5 to 14

<sup>5</sup> Pages 15 to 22

and the final set of questions asks details about respondents eg how they heard about the survey and Equalities Monitoring questions<sup>6</sup>.

Page 27 onwards gives a summary of comments from businesses and organisations.

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<sup>6</sup> Pages 16 to 26

## Results

### Q How often do you use these forms of transport in the area?

	Every day, or nearly every day		2-3 days a week		Once a week		Less often but at least once a month		Less than once a month		Never	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Walk	946	79.9	137	11.6	40	3.4	18	1.5	24	2.0	19	1.6
Cycle <sup>7</sup>	95	8.6	164	14.9	95	8.6	100	9.1	150	13.6	498	45.2
Bus	31	2.7	156	13.6	141	12.3	218	19.0	291	25.4	310	27.0
Car/ van as driver <sup>8</sup>	208	18.0	402	34.8	179	15.5	81	7.0	58	5.0	227	19.7
Car/ van as passenger	47	4.4	162	15.1	191	17.8	195	18.2	206	19.2	273	25.4
Motorcycle/ moped	13	1.2	8	0.7	7	0.7	6	0.6	5	0.5	1029	96.3
Wheelchair/ mobility scooter	9	0.8	3	0.3	1	0.1	5	0.5	6	0.6	1035	97.7
Taxi/ Private Hire	2	0.2	23	2.1	84	7.6	238	21.4	489	44.0	275	24.8
Community Transport <sup>9</sup>	0	0.0	0	0.0	2	0.2	2	0.2	6	0.6	1055	99.1
Other	13	1.6	4	0.5	2	0.3	4	0.5	6	0.8	765	96.3

Table 1: Current types of travel in the Hanover and Tarn area

Other includes Run (x3), Scooter (x2), Train (x2), e-scooter (x1), Skateboard (x1). The graphs below show differences between those who eg cycle regularly and not so regularly.<sup>10</sup>

<sup>7</sup> Includes BTN Bikeshare, e-bike, cargo bike, e-cargo bike, adapted bike, tricycle

<sup>8</sup> Includes car club

<sup>9</sup> Eg Dial-a-ride, volunteer car scheme

<sup>10</sup> Throughout this report regular = once a week or more, not so regular/ irregular = less than once a week, unless stated otherwise

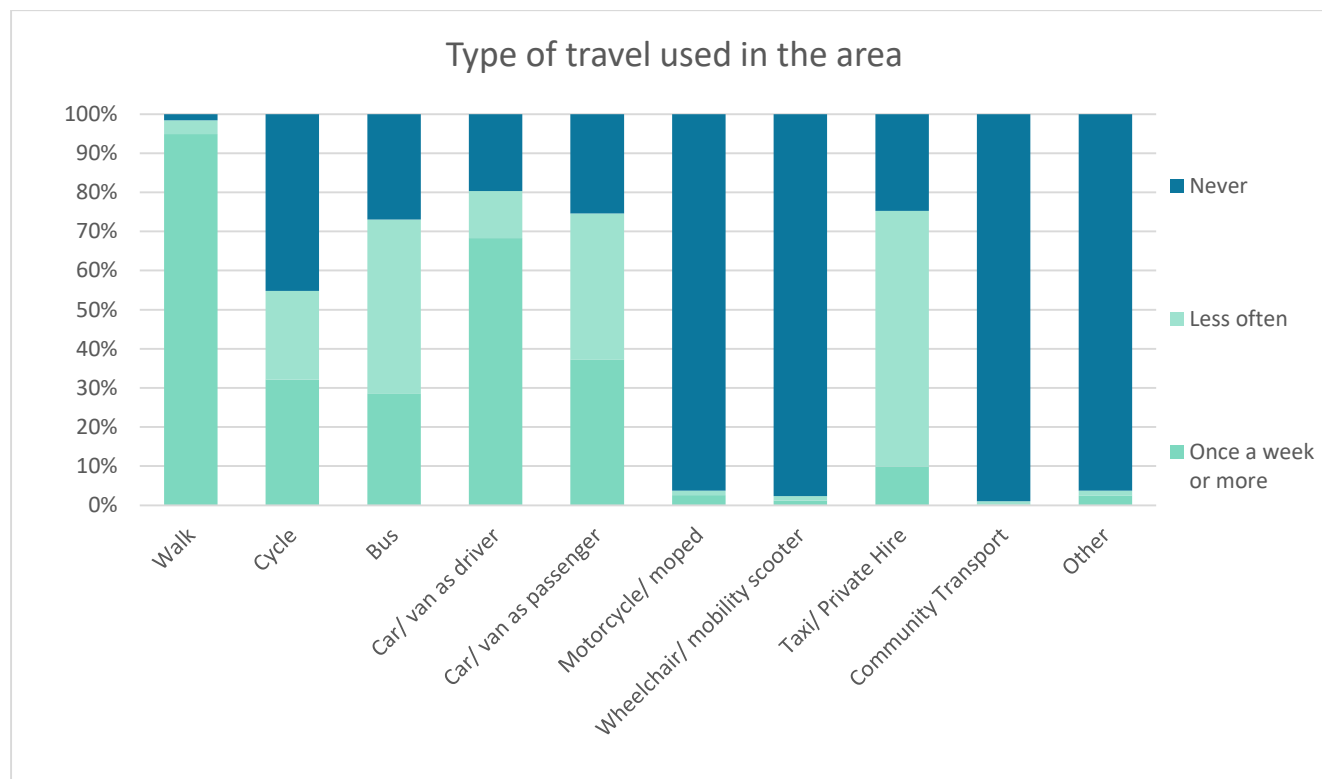


Figure 1: Types of travel modes used in the Hanover and Tarnier area

1123 respondents (94.9%) walk in the area on a regular basis, compared to 789 (68.3%) regular car drivers and 354 (32.1%) cyclists.

**Q Thinking about the Hanover and Tarnier Area, please rate each of the following:**

	Very Good		Good		Neither good or poor		Poor		Very poor		Don't know	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
The condition of the pavements	26	2.2	273	22.6	373	30.9	389	32.2	136	11.3	11	0.9
The provision of crossing points	48	4.0	320	26.6	415	34.5	311	25.9	89	7.4	19	1.6
The provision of cycle lanes / tracks	40	3.3	170	14.2	313	26.1	298	24.9	210	17.5	168	14.0
The amount of cycle parking	94	7.8	236	19.6	230	19.1	288	24.0	148	12.3	206	17.1
Traffic noise	180	15.0	391	32.5	338	28.1	186	15.4	77	6.4	32	2.7
Air Quality	109	9.0	366	30.3	351	29.1	184	15.3	77	6.4	119	9.9
The quality of public spaces (eg places to sit or meet)	106	8.8	303	25.1	313	25.9	313	25.9	144	11.9	29	2.4

Table 2: Opinions on provision of walking and cycling infrastructure, quality of public spaces and traffic noise or air quality

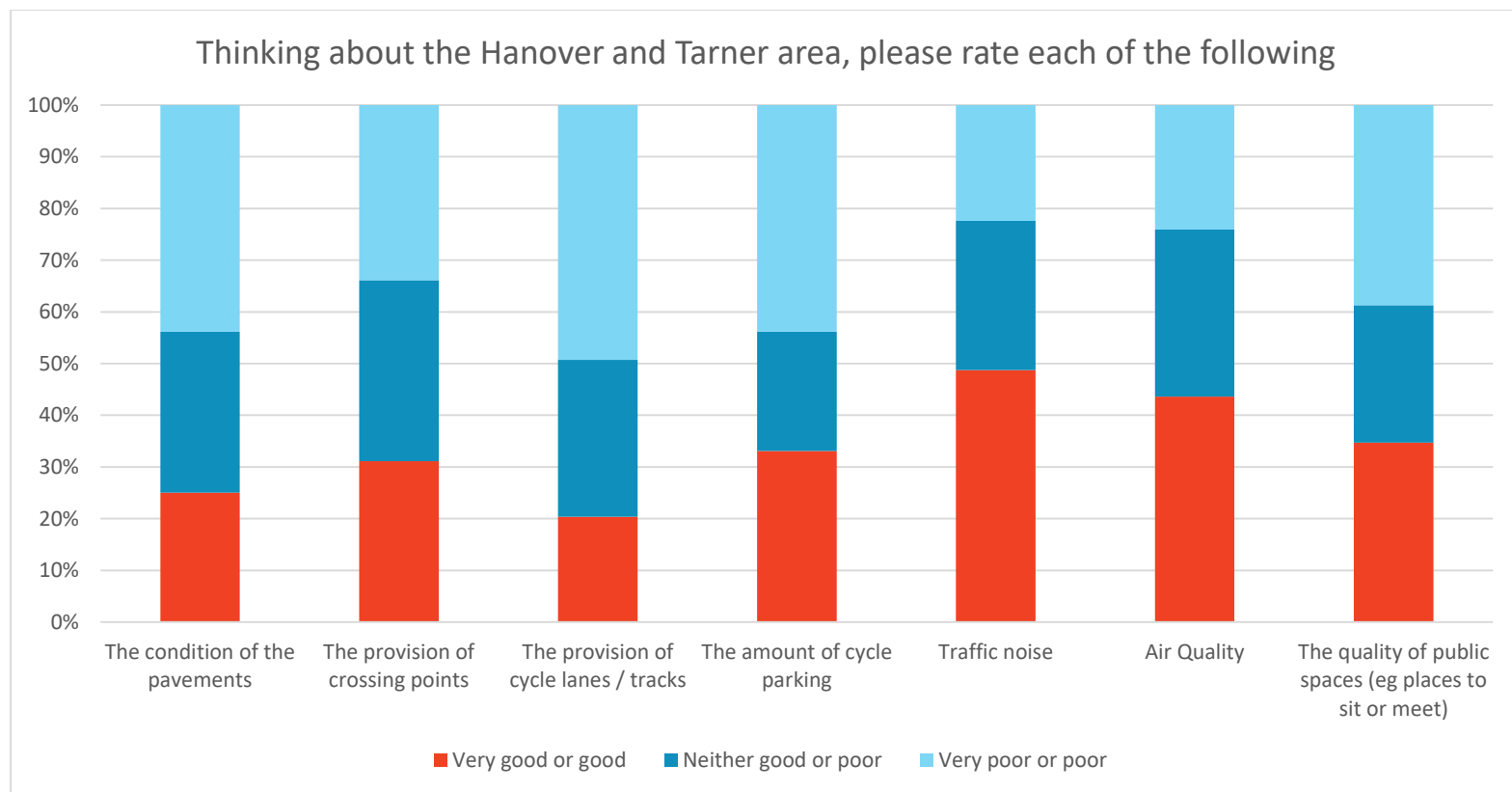


Figure 2: Opinions on provision of walking and cycling infrastructure, quality of public spaces and traffic noise or air quality

## Q How easy are the following in the Hanover and Tarner area?

	Very easy		Easy		Neither easy or difficult		Difficult		Very difficult		Don't know	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Getting around the area on foot	617	51.1	380	31.5	109	9.0	79	6.5	14	1.2	9	0.7
Getting around the area as a disabled person or a person with mobility issues	27	2.3	46	3.8	67	5.6	181	15.1	136	11.4	739	61.8
Crossing the road	329	27.3	412	34.2	283	23.5	154	12.8	18	1.5	7	0.6
Getting around the area by car or van	172	14.3	393	32.6	338	28.0	160	13.3	24	2.0	119	9.9
Getting around the area by motorcycle / moped	87	7.3	126	10.6	59	5.0	7	0.6	4	0.3	904	76.2
Getting around the area by cycling	208	17.4	242	20.2	174	14.5	158	13.2	45	3.8	369	30.9
Getting around the area by bus	101	8.4	296	24.6	262	21.8	157	13.1	40	3.3	345	28.7

Table 3: Ease of getting around the Hanover and Tarner area

Respondents who state that they have a disability<sup>11</sup> perceive it to be more difficult<sup>12</sup> to get around the area (52%) than those who state that they don't have a disability (21.8%).

<sup>11</sup> Respondents who answered 'Yes, a little' or 'Yes, a lot' in answer to the question 'Are your day-to-day activities limited because of a health issue or disability which has lasted, or is expected to last, at least 12 months?

<sup>12</sup> Difficult or very difficult



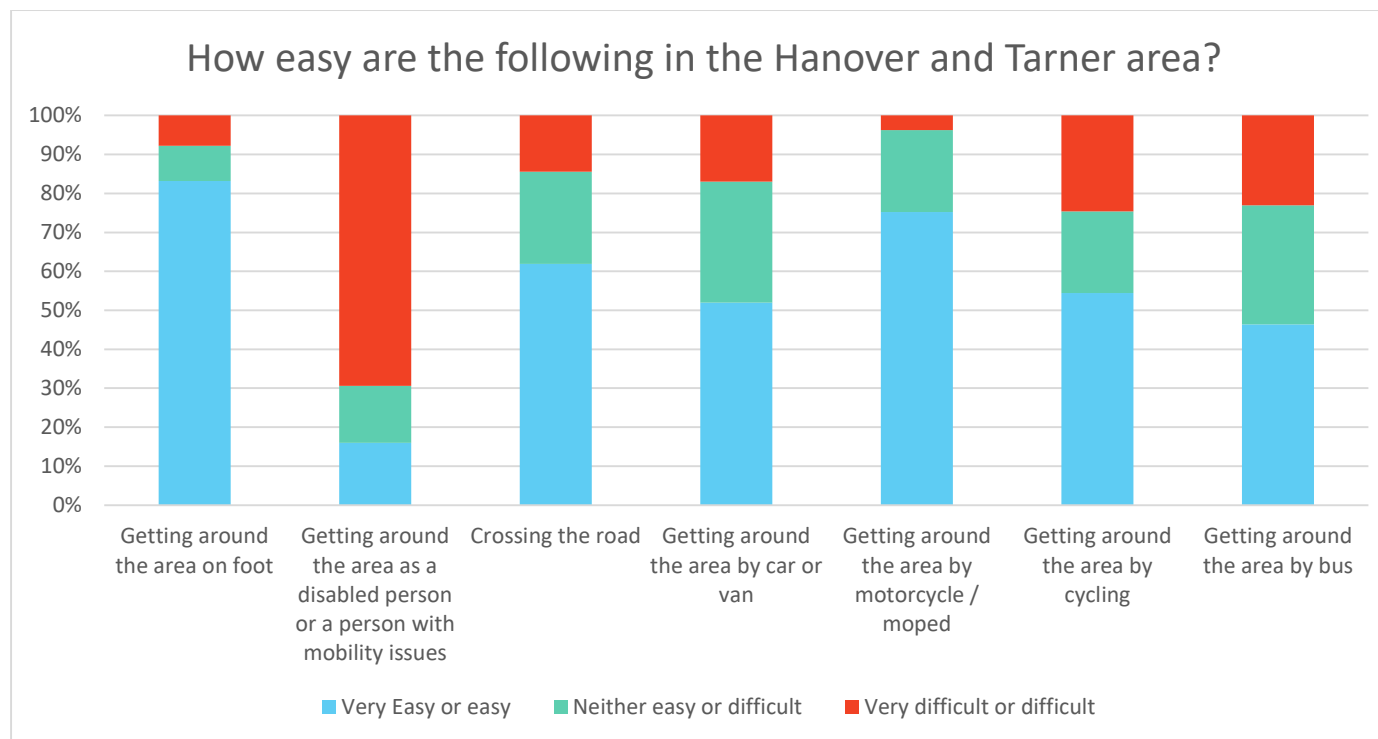


Figure 3: Ease of getting around the Hanover and Tarner area

**Q How would you score the overall quality of walking or wheeling conditions in the area?**

Respondents were asked to score walking or wheeling conditions from 1 to 10 (where 1 is poor and 10 is excellent).

	No.	%
1	24	2.1
2	24	2.1
3	65	5.6
4	99	8.6
5	146	12.7
6	132	11.5
7	148	12.9
8	206	17.9
9	126	10.9
10	160	13.9
Don't know	21	1.8
<b>Total</b>	<b>1151</b>	<b>100</b>

Table 4: Levels of satisfaction with walking and wheeling conditions in the area

The average satisfaction score for walking or wheeling was 6.1

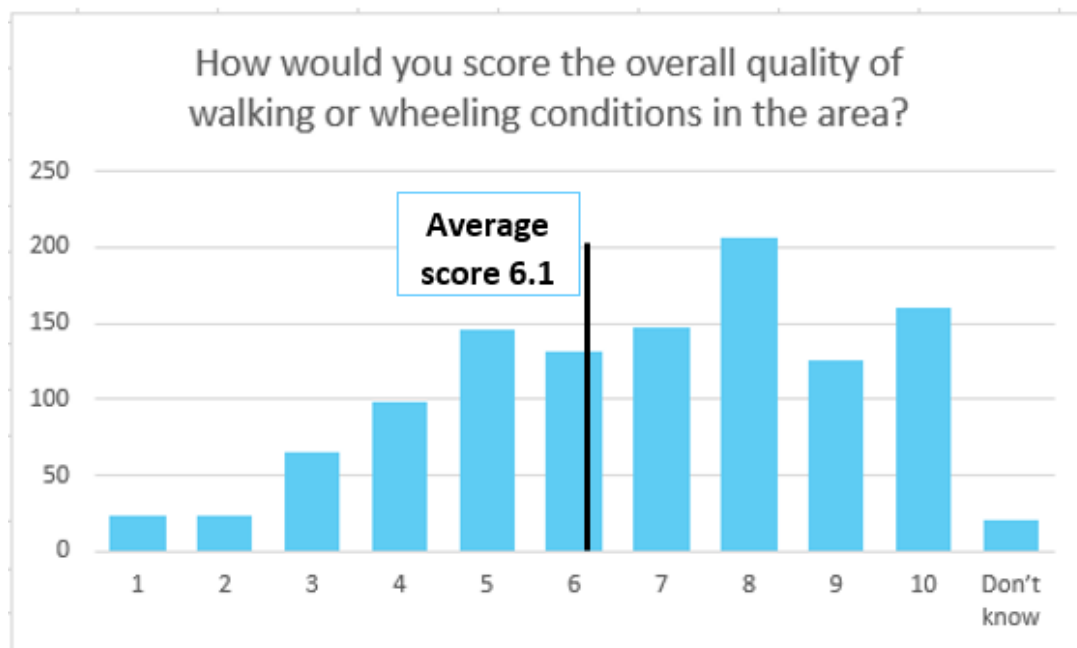


Figure 4: Walking and wheeling satisfaction score

## Q If you walk or wheel in the area, how safe do you feel?

	Very safe		Safe		Neither safe or unsafe		Unsafe		Very unsafe		Don't know	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
During the day	557	46.3	448	37.2	110	9.1	61	5.1	14	1.2	13	1.1
At night	236	19.7	511	42.7	229	19.1	153	12.8	33	2.8	34	2.8

Table 5: Perceptions of safety for walking and wheeling in the area

If respondents answered safe or unsafe, they were asked to say more about this. Comments have been themed as follows:

Comment	No. of times mentioned <sup>13</sup>	Specific areas <sup>14</sup>
Anti - social behaviour / drug dealing	64	Elm Grove (x4), Queen's Park (x3), Queen's Park Road (x3), Tarner Area (x3), Bentham Road (x2), The Level (x2)
Not enough lighting / LED lights not good / hard to see trip hazards at night	46	Queen's Park (x7), Franklin Road (x3), Queen's Park Road (x2)
Speeding traffic / fast turning into roads/ rat running / volume of traffic	46	Elm Grove (x8)
Street Clutter	22	
Doesn't feel safe for women	21	
Pavement parking / double parking	19	Elm Grove (x3)
Pavement condition	17	
Not enough crossings / crossings poor / dropped curbs	13	Queen's Park Road (x2)
Lack of priority / poor visibility / at junctions	7	
Don't feel safe anywhere at night	6	

Table 6: Comments on perception of walking and wheeling in the area (where respondents have said they feel unsafe or very unsafe)

<sup>13</sup> Mentioned more than 5 times

<sup>14</sup> Mentioned more than once

During the day, only 6.3% of respondents feel unsafe or very unsafe but this rises to 15.6% at night. The most common reason stated is anti-social behaviour and drug dealing.

### Q How would you score the overall quality of cycling conditions in the area?

Respondents were asked to score cycling conditions from 1 to 10 (where 1 is poor and 10 is excellent).

	No.	%
1	37	3.3
2	40	3.5
3	73	6.4
4	87	7.7
5	170	15.0
6	89	7.9
7	98	8.7
8	112	9.9
9	69	6.1
10	101	8.9
Don't know	256	22.6
<b>Total</b>	<b>1132</b>	<b>100</b>

Table 7: Levels of satisfaction with cycling in the area

The average satisfaction score for cycling was 6

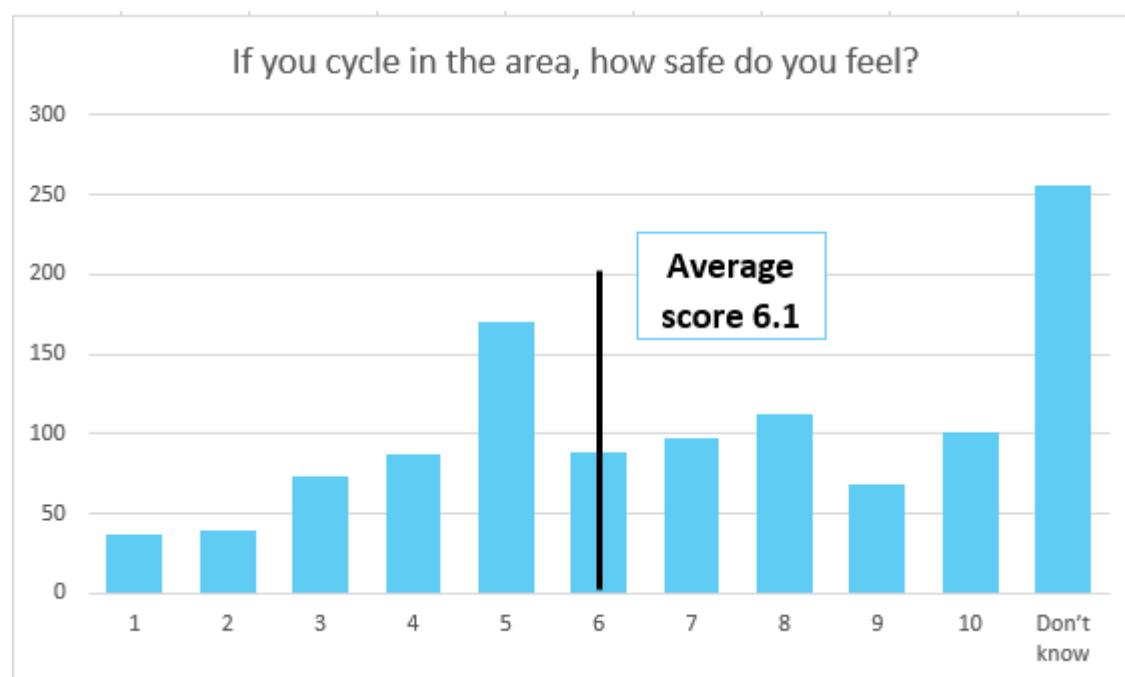


Figure 5: Cycling satisfaction score

## Q If you cycle in the area, how safe do you feel?

	Very safe		Safe		Neither safe or unsafe		Unsafe		Very unsafe		Don't know	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
During the day	192	17.7	262	24.2	131	12.1	102	9.4	26	2.4	371	34.2
At night	137	12.7	239	22.2	148	13.7	103	9.5	38	3.5	414	38.4

Table 8: Perceptions of safety for cycling in the area

If respondents answered safe or unsafe, they were asked to say more about this. Comments have been themed as follows:

Comment	No. of times mentioned <sup>15</sup>
Dangerous drivers / speeding traffic / volume of traffic	56
Steep Hills - cycling downhill / vehicles overtaking on hills	48
Too many parked cars / blocking routes / restricting views / poor visibility at junctions / pavement parking	42
There are no cycle lanes / no cycle priority	36
Poor driver behaviour towards cyclist / passing too close	26
Narrow roads	20
Poor road condition / surface	11
More cycle hangars needed / cycle parking	7
Poor lighting	6

Table 9: Comments on perception of cycling in the area (where respondents have said they feel unsafe or very unsafe)

There is not a wide variation between cyclists who say they feel unsafe or very unsafe during the day or at night (11.8% v 13%). Reasons given are related to driver behaviour and volume of traffic.

<sup>15</sup> Mentioned more than 5 times

## COMMENTS ON THE PROPOSED DESIGN

**Q Considering the ‘bus gate’ shown on the plan, how would you prefer it to operate?**

**Timings:**

	No.	%
24 hours a day	184	22.4
During peak times only (eg 7am to 10am and 3pm to 7pm)	382	46.5
Don't know	256	31.1
<b>Total</b>	<b>822</b>	<b>100</b>

Table 10: Number of respondents who stated a preference for times of operation for a Bus Gate

**Location:**

	No.	%
In the location currently shown	200	22.6
In a different location in the area	383	43.3
Don't know	302	34.1
<b>Total</b>	<b>885</b>	<b>100</b>

Table 11: Number of respondents who stated a preference for location of a Bus Gate

**Q If you answered, ‘In a different location in the area’ Please give us your suggestion for this.**

Suggestions for other locations	No. of times mentioned
Further up / Part way up / half-way up Southover Street	29
At top of Southover Street	8
Other comments on the Bus Gate:	
Don't need at all / no location / remove / waste of money / bad idea / not enough buses / won't work	408
Will cause/ concerned about displacement driving / extra traffic /rat running / to boundary roads / congestion elsewhere	32
Not enough buses to justify this	23
It's / it will be confusing / is it legal not in Highway Code / call it a bus lane/ what is a bus gate?	12
Money making exercise	11
Will increase travel distances / journey times	7
This is a main access point	5

Table 12: Suggested locations for a Bus Gate

Although 383 respondents stated that they would like the bus gate in another location, only 37 gave locations. 408 respondents said that they don't want a bus gate at all in the area.

### Q Do you have any comments on the proposals?

In total 1092 (89.6%) respondents made comments on the proposals, these comments have been themed and split into two tables as follows: comments on the proposals and comments on processes:<sup>16</sup>

Comments on proposals	No. of times mentioned <sup>17</sup>
Traffic will be displaced / will increase traffic and congestion on other roads or boundary roads /will create new rat runs / increase pollution on streets / traffic all filtered into one area	590
Restricts access in, out and within the area / not enough entry or exit points / closures and one-ways complicate routes and frustrate drivers / cuts off disabled and elderly residents / increases journey time, fuel cost and emissions / Issues reaching streets or properties easily or at all	405
No problems in this area / scheme not needed / waste of money / this is a money-making exercise	277
I / We don't support this scheme/ want option to reject the scheme / remove plans completely	233
Will make it more dangerous / more dangerous for children / will increase pollution around schools / dangerous crossings and junctions / blind corners	186
Will increase time spent looking for a parking space / will displace parking to other streets	98
Remove proposed road closures / remove "no left" or "no right" turn /too many blocked roads	96
Restricts access to businesses or facilities / how will businesses get deliveries / forces inappropriate delivery routes / cuts off elderly or disabled residents from essential services / damages local businesses	93
Agree with proposed plan / agree the scheme is needed / implement ASAP	91

<sup>16</sup> 3833 comments were made by 1092 respondents. Some respondents made several points about the proposals, 126 respondents made no comments.

<sup>17</sup> The number of comments relate to the number of respondents who have mentioned this subject. Only themes mentioned by ten or more respondents are shown

Comments on proposals	No. of times mentioned <sup>17</sup>
Introduce more traffic calming / camera enforcement / speed enforcement	84
Discriminates against drivers / need car for work / disagree with council policy	77
Concerned about reduction of parking / disabled parking / do not replace parking spaces with parklets or greening / how many spaces will be lost?	74
Proposals will lead to blocked roads / food deliveries and refuse vehicles will have longer and more difficult routes / how will vehicles turn / visits by tradesmen and deliveries to residents will be made more difficult / can't pass large vehicles in narrow roads	69
Want even more greening / parklets / supportive of proposed parklets	67
No bus gate / not needed / will cause fines / confusion / congestion / displacement traffic / remove all city bus gates - replace with bus lanes / money-making / too restrictive / clear signage needed	65
Plans focus on the wrong areas / favour wealthier areas / benefits some at the expense of others	53
Scheme is too ambitious / won't realise ambitions / aims / goes too far / lighter touch measures needed / some things will be expensive to undo	52
Need more buses / increase frequency / make Public Transport a viable alternative to cars / reduce fares / Park and ride	52
Keep current two-way system or make roads two-way	49
More holistic / joined up approach needed / link to other areas / area is treated as an experiment / area outside boundary not considered / want to be included / Tarner area added as an afterthought	43
Need more cycle parking / hangars / secure cycle parking / e-bike parking / cargo bike parking / support hangars	38
Scheme is not what was initially proposed / preferred earlier versions	36
Need more crossings / dropped kerbs	36
Concerned about impact on emergency vehicles / routes to hospital	32
Reduce street clutter	32
Pavement / illegal parking is the main issue / solve pavement parking	28
Improve / Widen pavements	26
Reverse the proposed one-way direction / change current one-way direction	25



Comments on proposals	No. of times mentioned <sup>17</sup>
A focus on walking and cycling in this hilly area discriminates against some people/ problematic during icy-weather / too hilly to cycle	24
Don't need parklets near to existing parks eg Queen's Park/ The Level / Valley Gardens	23
Need further measures to restrict cars / pedestrianisation / cars should not be priority / scheme doesn't go far enough / prioritise walking and cycling at crossings / introduce wider ranging initiatives eg ULEZ instead	22
Concerned parklet will cause anti-social behaviour	21
Improve EV charging infrastructure	21
Allow residents /businesses / disabled / car club vehicles / refuse vehicles/ emergency services into the area or through the bus gate	20
Blocks of adjacent roads should not be one-way in the same direction / alternate flow on at least one	19
More seating / benches	18
Bus services are too infrequent to need a bus gate/ operate less hours	18
Worried about upkeep and maintenance of any new green spaces / infrastructure	18
Want more cycle lanes / paths	17
Introduce more road closures / move proposed road closure	17
Concerned one-way streets will encourage speeding	17
Won't stop rat runs or solve other problems	17
Keep or allow pavement parking / create bays / more or improved parking / create verge parking / narrower pavements in favour or parking off road / chevron parking	14
Remove two-way proposal / want streets to be or remain one-way / make more or all roads one-way	14
I support the bus gate / peak hours	12
Parking zones S and V need boundaries changing / Top Triangle / want to park in Zone C	11
Remove parking in favour of greening / short term parking / Move parking to other side of the road / get rid of one side of parking	11

Comments on proposals	No. of times mentioned <sup>17</sup>
More BTN Bikeshare hubs / e-bike share / cargo bike hire	11
Unclear how a bus gate works / what is a bus gate?	11
Introduce community food growing projects / composting / pop up events or services	10

Table 13: Comments on scheme proposals

Comments on processes	No. of times mentioned <sup>18</sup>
Majority of residents do not want this scheme/ not resident led/ undemocratic / proposed by a minority of people,	98
Lack of published / data used to develop the scheme / share impact assessment, EQIA data / drawn up by people without local knowledge/ monitor who is driving into area/ has a CBA been done?	96
Money should be spent in other areas eg community centres / waste and recycling / parks / clean air zone / less car use / more public transport use / anti-social behaviour/ tidy up existing areas	86
Issues with consultation: areas, groups or stakeholders not consulted / workshops held at inappropriate times / not knowledge of it / workshops unhelpful / plans incorrect, unclear or not detailed enough	66
How will scheme be monitored? / what are the tolerance levels? /18 months is too long / what is duration of pilot scheme?	17

Table 14: Comments on processes

Within a comment on proposals, respondents often made reference to specific areas / streets / issues. Areas mentioned by more than five respondents for each of the comment themes above are shown in the table below:

<sup>18</sup> The number of comments relate to the number of respondents who have mentioned this subject. Only themes mentioned by ten or more respondents are shown

Comment Theme	Locations	Number of respondents who mentioned <sup>19</sup>
Traffic will be displaced / will increase traffic and congestion on other roads or boundary roads /will create new rat runs / increase pollution on streets / traffic all filtered into one area	Elm Grove	205
	Queen's Park Road	124
	Bentham Road	110
	Whichelo Place	70
	Islingword Place	51
	Carlyle Street	30
	Hartington Road	19
	Sussex Street	15
	Bonchurch Road	14
	Edward Street	13
	Lewes Road	12
	Carlton Hill	8
	John Street	6
	Elmore Road	6
	Hanover Street	6
	Egremont Place	5
	St Johns Place	5
	Grand Parade	5
	Arnold Street	5
	Lincoln Street	5
Restricts access in, out and within the area / not enough entry or exit points / closures and one-ways complicate routes and frustrate drivers / cuts off disabled and elderly residents / increases journey time, fuel cost and emissions / Issues reaching streets or properties easily or at all	Lincoln Street	8
	Islingword Road (Western end)	8
	Split area into smaller cells	6
	Windmill Street	6
	Hanover Mews	6
	Ewart Street	5
	Washington Street	5
	Coleman Street	5
	Hanover Terrace	5
	Richmond Street	5
Will make it more dangerous / more dangerous for children / will increase pollution around schools / dangerous crossings and junctions / blind corners	Routes to school and nurseries on Elm Grove / Bentham Road Elm Grove junction	90
	Routes to school on Queen's Park Road / Orchard Nursery / St Luke's Primary School	21
	Routes to Carlton Hill Primary	18
	Routes to Tarnerland Nursery	12
Remove proposed road closures / remove "no left" or "no right" turn /too many blocked roads	Franklin Road (closure)	19
	Islingword Road / Queen's Park Road (closure)	16
	Richmond Parade / Grove Hill / Ashton Rise (closure)	15

<sup>19</sup> Respondents could and did mention multiple locations. Only locations mentioned by name 5 or more times under that theme are included

Comment Theme	Locations	Number of respondents who mentioned <sup>19</sup>
	Islingword Road / Elm Grove (closure)	12
	Sussex Street / John Street (closure)	12
	Kingswood Street / John Street (closure)	6
Restricts access to businesses or facilities / how will businesses get deliveries / forces inappropriate delivery routes / cuts of elderly or disabled residents from essential services / damages local businesses	Will affect customer access and damage trading to the GP / Pharmacy / pillar box etc at the top of Islingword Road	29
	Affects deliveries / delivery routes to Pharmacy / pub / shops / takeaway at the top of Islingword Road	27
Introduce more traffic calming / camera enforcement / speed enforcement	Queen's Park Road	12
	Elm Grove	9
Concerned about reduction of parking / disabled parking / do not replace parking spaces with parklets or greening / how many spaces will be lost?	Islingword Road (parklet)	9
	Elm Grove	7
Proposals will lead to blocked roads / food deliveries and refuse vehicles will have longer and more difficult routes / how will vehicles turn / visits by tradesmen and deliveries to residents will be made more difficult / can't pass large vehicles in narrow roads	Bentham Road	13
Keep current two-way system or make roads two-way	Islingword Road	14
	Richmond Street	14
	Whichelo Place	7
	Albion Hill	7
	Blaker Street	5
	Grove Street	5
Reverse the proposed one-way direction / change current one-way direction	Bentham Road	7
	Carlyle Street	5
Blocks of adjacent roads should not be one-way in the same direction / alternate flow on at least one	White Street / Blaker Street	5
Introduce more road closures / move proposed road closure	Islingword Road / Queen's Park Road closure moved further west	5
Keep or allow pavement parking / create bays / more or improved parking / create verge parking / narrower pavements in favour of parking off road / chevron parking	Elm Grove	9

Comment Theme	Locations	Number of respondents who mentioned <sup>19</sup>
Remove two-way proposal / want streets to be or remain one-way / make more or all roads one-way	Southover Street	8
Remove parking in favour of greening / short term parking / Move parking to other side of the road / get rid of one side of parking	Southover Street	7

Table 15: Specific locations mentioned in scheme proposals (Table 14 above)

Most comments were related to concerns about displacement traffic (590). Highest locations stated were Elm Grove, Queen's Park Road and Bentham Road

Comments about access restrictions were second highest (405)

186 respondents said that the area could become more dangerous, mostly relating to areas around, and journeys to and from, schools and nurseries

## About You

### Q Are you:

	No.
A resident	1128
A worker in the area	115
A visitor to the area	42
A person who travels through the area to get from 'A' to 'B'	120
A business owner or manager in the area	41
A representative of a local interest group or organisation	5

Table 16: Respondents relationship to the area

Businesses who responded to the consultation <sup>20</sup>
Workshops for the Imagination
Archers
Lush Tums
Cox and Taylor
Berkson Bakes
Brighton Staging Co.
Laconic Films

Table 17: Named businesses who made comments<sup>21</sup>

Local interest group or organisation who responded to the consultation
Elm Grove Primary School - Inclusion
Elm Grove Primary School – Full Governing Body
Orchard Day Nursery
Hanover Community Association
Brighton Access for Disabled Groups Everywhere (BADGE)
Bricycles
Shoreham-By-Cycle

Table 18: Named organisations who made comments

<sup>20</sup> Despite 41 respondents saying they own or manage a business in the area. Only 7 made comments on proposals. A summary of comments made by business and organisations is included on page 28

<sup>21</sup> 41 responses are from business owners or managers in the area, but only 7 gave their business name

## Q How did you hear about the survey?

	No.	% <sup>22</sup>
I received an information booklet in the post	599	49.2
I received a postcard	170	14.0
I read about it on the council's website	122	10.0
I read about it on social media	330	27.1
I saw a poster	113	9.3
I heard about it by word of mouth	344	28.2
I read about it in the local press	84	6.9
Other:	63	
Includes: <sup>23</sup> Flyer from residents / groups opposing the scheme (x14) Street rep / street WhatsApp group (x6), Work emails / email (x3), Through the Green Party (x3), Local councillor / Council meetings (x2), I found it / found it by chance (x2)		5.2

Table 19: How did you hear about the survey?

## Q Have you taken part in any of the previous engagement activities relating to the Hanover and Tarnier liveable neighbourhood project?

Type of previous engagement	No.	% <sup>24</sup>
Yes – I took part in the online interactive mapping exercise	145	11.9
Yes – I completed a survey on the design options	224	18.4
Yes – I have attended workshops / events at local centres	202	16.6
No – This is my first engagement with the project	758	62.2
Other:	62	5.1
Includes: Wasn't aware of previous activities / wasn't contacted (x24), Contact with local councillor (x9), Couldn't attend workshops - was working / looking after children / school holidays (x9), Attended street / community meetings / school meetings (x8), Engaged through local social media groups (x5), Have signed a petition against the scheme (x4), Initial exercises were not fit for purpose (x2), Drop-in session at Phoenix (x2), Exhibition - can't remember when (x2), I live outside LTN area (x2)		

Table 20: Respondents who took part in previous engagement activities

<sup>22</sup> Does not equal 100% as respondents could choose more than one option

<sup>23</sup> Mentioned more than once

<sup>24</sup> Does not equal 100% as respondents could choose more than one option

## Equalities Monitoring information

Gender	No.	%	Citywide % <sup>25</sup>
Female	577	51.8	50.2
Male	527	47.3	49.8
Non-binary	6	0.5	-
Other	3	0.3	-
<b>Total</b>	<b>1113</b>	<b>100</b>	<b>100</b>

Table 21: Gender of respondents

Age	No.	%	Citywide %
16 and under	2	0.2	17.2
17-24	17	1.5	15.0
25-34	124	11.1	16.4
35-44	273	24.1	16.0
45-54	331	29.5	13.1
55-64	218	19.4	9.3
65-74	129	11.5	6.4
75 and over	27	2.4	6.7
<b>Total</b>	<b>1121</b>	<b>100</b>	<b>100</b>

Table 21: Age of respondents

Disability	No.	%	Citywide %
Yes, a little	110	9.8	7.5
Yes, a lot	62	5.5	8.8
No	946	84.6	83.7
<b>Total</b>	<b>1118</b>	<b>100</b>	<b>100</b>

Table 22: Disability status of respondents

Disability type <sup>26</sup>	No.
Physical impairment	111
Sensory impairment	16
Learning disability/ difficulty	7
Long standing illness	47
Mental health condition	33
Developmental condition	1
Autistic spectrum	14
Other	9

Table 23: Disability type

<sup>25</sup> 2011 Census

<sup>26</sup> Respondents could choose more than one disability type



Ethnicity		No.	%	Citywide %
Arab	Arab	4	0.4	0.8
Asian/ Asian British	Bangladeshi	1	0.1	0.5
	Chinese	4	0.4	1.1
	Indian	6	0.6	1.1
	Pakistani	0	0.0	0.2
	Any other Asian background	2	0.2	1.2
Black/ Black British	African	0	0.0	1.1
	Caribbean	1	0.2	0.3
	Any other black background	0	0.0	0.2
Mixed	Asian and white	15	1.4	1.2
	Black African and white	3	0.3	0.7
	Black Caribbean and white	3	0.3	0.8
	Any other mixed background	17	1.6	1.0
White/ White British	English / Welsh / Scottish / Northern Irish	866	80.4	80.5
	Irish	29	2.7	1.4
	Gypsy or Irish Traveller	0	0.0	0.1
	Any other white background	117	10.9	7.1
Other	Any other ethnic group	9	0.8	0.7
<b>Total</b>		<b>1077</b>	<b>100</b>	<b>100</b>

## **Hanover Liveable Neighbourhood Consultation Summer 2022**

### **Summary of feedback from businesses and other organisations**

This feedback is either from respondents who have identified as representing a businesses or organisation in the council's consultation portal survey or from businesses and organisations who have emailed directly.

#### **Businesses**

##### **Workshops for the Imagination (Islingword Road)**

There has been no consultation with shops and businesses at the top of Islingword Road. The scheme will be detrimental to the 40+ local businesses if access is restricted, especially with the proposed road closure. It will also affect deliveries from suppliers as the only way to deliver to the shops at the top of Islingword Road would be via Bentham Road and along Whichelo or Islingword Place. These are currently very quiet roads.

Some businesses are using e-cargo bikes or electric vans but these are not practical solutions for everyone, especially where heavy loads are being moved, where there is a need for a larger vehicle or, in the cases of the Post Office, where security vans are used.

Tradespeople will face having longer journeys within the scheme area.

##### **Archers Butchers (Islingword Road)**

There has been little communication with businesses with only one meeting at the Hanover Centre in August.

The scheme is unnecessary as Hanover is not a rat-run. Traffic restrictions will be detrimental for our business. Deliveries and collections and for customers to reach us, from both within and outside the scheme area, will be affected. The scheme will cause inconvenience to our customers and suppliers.

Deliveries of products can weight up to 100kg. There are strict hygiene standards for collection of our business waste. This private waste collection vehicle is larger than an average refuse truck and has to be able to continue without compromise.

There is no excess traffic on Islingword Road.

### **Lush Tums (Windmill Street)**

The proposal could create problems for the Tarner area as all traffic will be forced along Queen's Park Road.

Stanley Street, Windmill Street and those in the Tarner area are currently quiet.

People who live on this side of the hill will have to drive further along Grand Parade and up Edward Street and Queen's Park Road which will be a long detour. This will add more traffic to the already congested Grand Parade. If travelling in the other direction eg from The Level to Windmill Street, travel will need to be via Elm Grove up to Queen's Park Road. This will be a long detour: four times as long, using more fuel and adding more pollution.

### **Cox & Taylor Ltd (Southover Street)**

The proposals are appalling. They will not improve access in the area and will make it far worse. Elm Grove will be gridlocked at peak hours and probably for most of the day.

### **Berkson Bakes (Bentham Road)**

The scheme has not been thought out holistically for the area as a whole. Blocking access to some roads will shift traffic to different roads, which seems unfair on those who live on roads which most affected.

Bentham Road does not have a problem with excess traffic and doesn't need to be changed to make it more 'liveable'. If the area is going to change, put a block between Islingword Place and Whichelo Place, whilst keeping those streets two-way. An alternative would be to use one-ways streets: one going Bentham Road to Islingword Road and the other going from Islingword Road to Bentham Road. This would enable residents / deliveries and tradespeople access to these streets, while slightly reducing vehicles using Bentham Road as a cut-through. Rising bollards could be also used rather than a permanent block (allowing through traffic during peak times eg for school drop off and collection and restricting traffic during non-peak times.

Blocking access to the top of Islingword Road would affect businesses in that area, in particular the Post Office, doctor's surgery and pharmacy who need good vehicle access.

Keep the existing directional flow of traffic in the top-triangle area. If traffic flow is reversed on Bentham Road, while also making all the roads in the 'top triangle' one way down to Elm Grove, traffic will be pushed onto Carlyle Street, which is steeper and narrower than Bentham Road.

Traffic on boundary roads will increase.

The area could be better improved and car use reduced if there were more investment in better and cheaper public transport and also by increasing numbers of Bike Share hubs in the area.

### **Brighton Staging Co (Islingword Road)**

Cars should not be the priority in this area. I approve of these measures. If it does not work it can be changed.

### **Laconic Films (Islingword Street)**

I do not support this scheme. Hanover does not have a problem with traffic. It is nearly always possible to walk down the centre of the road. Proposals to restricting traffic will increase congestion on boundary roads and on streets designated as entrance and exits. It will make it more difficult for pedestrians walking up Islingword Road, especially for children walking to St Luke's Primary School.

## **Organisations**

### **Elm Grove Primary school – Inclusion (Elm Grove)**

The scheme will not benefit the community only those within a small area. The scheme will cause traffic displacement into other areas outside of the boundary. We have concerns about extra traffic on Elm Grove in front of Elm Grove Primary School and also on Hartington Road in front of the playground at St Martin's Primary School. Please spend money on things which will benefit the whole community.

### **Elm Grove Primary School - Full Governing Body (Elm Grove)**

We have attended sessions, together with the Head Teacher and have reviewed the proposed plans. We have concerns that the proposals, and their impact on the safety of our school children, have not been taken into consideration.

The current proposal would increase the traffic along Bentham Road, one of the main access points into Hanover, and pass in front of the school. This may cause an increase in traffic along Baxter Road attempting to avoid queuing at the Queen's Park Road / Elm Grove junction. This may be temporary as people adjust their routes, however the safety of the children arriving and leaving school cannot be taken lightly. There is no guarantee that traffic may reduce and we feel that this has been overlooked in the plans.

We cannot see additional measures being added to reduce the speed of cars along Elm Grove and given that the school has not had a School Crossing Patrol Officer since October 2021, any increase in traffic will significantly increase the risk to children. In the last two months we have had a number of serious road traffic accidents along Elm Grove. An increase in traffic risks an increase in further incidents. Children may be arriving / leaving the school during peak traffic hours if they attend breakfast and after-school clubs.

A precautionary approach is essential relating to the safety of children. We would like confirmed by the local councillors that:

- 1) A School Crossing Patrol Officer will be recruited and in place before changes to the roads are made
- 2) Extended hours for the School Crossing Patrol Officer will be funded to cover the before and after school clubs
- 3) A full impact assessment on the risk to the children based on the worst-case scenario of traffic levels will be carried out and the report will be made available to us as a Governing Body so the council can be held to account if the measures identified in this report are not implemented.

If these three requests cannot be met, can you confirm that you agree with our concerns and will vote to place a hold on any changes until the correct modelling, risk assessments and planning can be implemented properly.

Funding for this LTN is coming from the Sustainability & Carbon Reduction Investment Fund. We would like to understand why priority has not been given to fund sustainable improvements to the school that would make the building more energy efficient. Whilst some improvements have been made to replace the lighting with more efficient LED's we are still operating in an old Victorian building with single glazed windows and poor insulation that is heated by gas. With the climate emergency we are experiencing, and declared by the council,

it is surprising that funding has not been provided to implement urgent and simple updates to the building to reduce the carbon impact of the school and reduce the energy costs, allowing more money to be made available to support the education of our children.

### **Orchard Day Nursery (De Montford Road)**

These proposals will increase traffic levels on Queen's Park Road which will affect the air quality for children at Orchard day nursery.

### **Hanover Community Association (Southover Street)**

Many hirers of the Community Centre do not live in Hanover, their business (often sole traders) use multiple sites and they need to use our car park. A number of hirers provide classes or events for local, sometimes disadvantaged Hanover and Tarner residents. In particular, Ambito, a charity who use the Centre on Fridays for disabled adults use a minibus to transport attendees from Albion Street to the Centre.

Access to our car park without access from Jersey Street, particularly for Ambito with their minibuses, will be very difficult, dangerous or even impossible.

### **Brighton Access for Disabled Groups Everywhere (BADGE)**

It's important that blue badge bays are not reduced and should be in fact increased at key areas. We feel the pocket park at the top of Islingword Road will lead to a removal of a blue badge bays: this proposal should be reversed.

Bays should be placed in places that do not cause difficulty ie up against bollards or by bins or cycle storage (we would happily help with any specific consultation on bays).

The scheme must not make it harder for those with mobility issues to come in and out of the area as well as the support network that these people may rely upon that includes careers and family members. Real thought must be given to this as well as improving the public realm in Hanover, many pavements are of very poor quality.

Some members also raised concern about the additional traffic on Elm Grove, which is used to access Brighton General Hospital, where wheelchair services are located.

## **Bricycles (City-wide)**

Bricycles welcomes Low Traffic Neighbourhoods (LTNs) and recognises that they reduce traffic. This enables more space to be freed up for people to play and gather, as well as giving more options to walk, wheel, scoot or cycle in a safe, accessible and welcoming environment. LTNs prioritise the quality of the environment (including air quality) above traffic flow, enabling streets to become public spaces whilst contributing towards a community's sense of wellbeing and connection.

Bricycles strongly supports proposals for the Hanover and Tarner area. To improve the proposals we recommend:

- A protected cycle lane in the uphill direction on Elm Grove: The feasibility of this has already been established and could be implemented without affecting the 'greening' scheme and without losing legal parking. It would use space that is currently appropriated by illegal car parking, which is unpopular with Elm Grove residents, so would help to gain public support. The uphill cycle lane would be our priority, due to the increased speed differential between cyclists and drivers, but a downhill lane should also be fully investigated. A protected cycle lane for Elm Grove is not currently included in the LTN proposals but we urge the Council to bring this forward. A cycle lane that is protected from motor traffic encourages more people to cycle, especially young people (including children), older people, disabled people, women, and others who are less willing to cycle. A cycle lane along Elm Grove would complement the LTN, allowing safe cycling access. In addition, Elm Grove is named as a strategic route in the LCWIP. A cycle lane here would contribute to the sustainable travel plans of both the school and hospital. If a cycle lane is not included now, it could be more complicated and costly to include it at a later date.
- Bringing forward electric bike hire (near the Level) to facilitate uphill journeys to Hanover and Tarner would provide a further option for people to reach their neighbourhood and would strengthen the proposals.

Bricycles is willing to meet Council officers to discuss its feedback.

## **Shoreham-By-Cycle**

People want our streets to be made better, safer and quieter. These schemes can cause friction at the beginning and attract a vocal minority on social media. It has been proven, in places like Oxford, Walthamstow, Islington and other

areas, that support grows once they are implemented.

Hanover is an ancient fishing village, built centuries before the invention of the motor vehicle. Over the last 50 years the car has taken over and ruined this jewel in Brighton's crown. It's time to take the streets back for people.



### **Summary of funding decisions**

#### **Budget Council - February 2022**

- It was agreed that additional capital investment for the Carbon Neutral Programme totalling £14.000 million would be available in 2022/23 and 2023/24. Expanding Liveable Neighbourhoods was identified as one of three priority areas for the allocation of some of these funds. Further decisions on sums were to be made by the Policy & Resources [P&R] Committee.

#### **ETS Committee - June 2022**

- A report outlined the expansion of the project area to better align with relevant guidance about Low Traffic Neighbourhoods. In addition, the proposed concept plan for the pilot area also included the principle of additional, permanent improvements on the three roads that formed the northern (Elm Grove) and eastern (Queen's Park Road and Egremont Place) boundaries of the project area.
- The estimated cost of the project was reviewed and this indicated that additional funding of up to £1.100 million would be required, in addition to the initial budget of £300,000 from the council's Local Transport Plan [LTP] capital programme. The ETS committee therefore agreed to seek this sum from the 2022/23 Carbon Neutral Fund [CNF] via P&R Committee.

#### **Policy & Resources [P&R] Committee - July 2022.**

- Specific allocations of CNF funding to develop and deliver Liveable Neighbourhoods were considered and agreed:-  
*'Expanding Liveable Neighbourhoods: £1.100m in 2022/23 and £1.000m in 2023/24'.*
- The supporting narrative in the report included:-
  - *'£1.100m will enable the delivery of a comprehensive pilot LTN scheme for the Hanover & Tarner area in 22/23, developed through community engagement and consultation.'*
  - *'£1.000m will enable the development and delivery of a further scheme in 23/24'*

#### **Budget Council - February 2023**

- A Labour Group Amendment (2) to the Budget was considered and agreed which stated:-  
*'Reallocating £1.100m of capital borrowing from the 2023/24 Hanover & Tarner Low Traffic Neighbourhood (LTN) scheme.'*  
This was to fund the capital refurbishment of public toilets.

#### **P&R Committee on 16 March 2023**

- Further discussion and decisions about funding for the Hanover & Tarner Liveable Neighbourhood project in relation to the CNF took place. A composite amendment proposed jointly by the Green and Labour Groups was agreed which stated:-

*‘2.3 That the committee notes the amendment agreed at Budget Council regarding the Carbon Neutral Funding regarding Liveable neighbourhoods, including funding for the Tarner and Hanover LTN.*

*2.4 That the committee agrees in principle to £1m being used for the Hanover and Tarner Liveable Neighbourhood Scheme that has buy-in from residents, with a clear emphasis on planned road safety improvement measures on Elm Grove, Queens Park Road and Egremont Place, subject to a detailed report back to ETS and P&R committees in the summer to comply with council’s financial procedures.’*

**Hanover & Tarner Liveable Neighbourhood****Elm Grove/Queen's Park Road/Egremont Place boundary roads engagement feedback summary****February 2023**

Location	Session 1 Online	Session 2 – St Luke's School	Session 3 - Online	Session 4 – Elm Grove School
Elm Grove	Elm Grove has puffin – there is illegal parking with no enforcement – could there be a build out in front of school to prevent fly parking/school drop off?			Pavement parking at school drop off is a danger. Can police enforce this?
	Why are different types of crossing proposed?			
	Elm Grove traffic speed restrictions – Vehicle Activated Sign (VAS) indicators are really important as vehicle speed is a problem			
				Close Arnold Street. Make Bonchurch one way.
				We live on Luther Street – love the greening on Luther/EG corner You may need a loading bay where the cycle hangar is planned to stop congestion for Flour Pot.
	No safe cycle routes in scheme, so speed reduction is key.	Measures for cyclists – priority lights, cycle lanes, cyclist alert signs		More cycle hangars.  Need additional cycle provision for cyclists  Make cycle hangars 'greener' / more attractive
	Could section beyond Tenantry Down Road be reduced to 30 mph? This increases speeding on Elm Grove			Introduce a physical barrier/narrowing at the top of Elm Grove to stop fast cars from Warren Road

Location	Session 1 Online	Session 2 – St Luke’s School	Session 3 - Online	Session 4 – Elm Grove School
				Good – planting, banning pavement parking, slowing traffic
				Displaced parking and non enforcement – a full CPZ is vital Need to expand parking zones – not enough V at the top of elm grove. Should be S at top triangle If parking spaces are lost parking permit numbers need to reduce too Concern about sufficient parking on Elm Grove  Maybe half and half chicane per block
	Could there be speed cameras on Elm Grove?			Elm Grove – why not speed camera?
				Like the full greening and more trees. Tall wildflowers and shrubs (Elm Grove)
				More benches on Elm Grove
				Remove unused bike racks on Elm Grove
	Lots of guard rail on Elm Grove – quite harsh			
				Need to flatten out tree roots for access for disabled
<b>QPR/Elm Grove junction</b>		Worried about this junction as much more traffic will be directed to this area.	Live close to EG/QPR junction – lots of accidents and near risks – will this make it worse?	Improve safety here asap – quick fix improve road markings & sign in wrong place
<b>Queen’s Park Road</b>		How will you increase or keep the same number of parking spaces on QPR half way up?	Not enough room for trees on the pavement – narrow bin obstruction. On-street trees reduces parking – lots of spaces lost to other schemes and bike parking in zone S.	Resident bays are long spans with varying capacity. Consider defined bays with EV charging points/build outs at each end stopping them encroaching on pavement.

Location	Session 1 Online	Session 2 – St Luke’s School	Session 3 - Online	Session 4 – Elm Grove School
			Can we have stats on parking demand and bay reduction?	The large motorcycle bay on QPR near Richmond St could include a car space or tree space – poorly used currently
		QPR (Elm Grove to Pankhurst – plant trees on the embankment rather than the road. No loss of parking and deeper root stock		
		I welcome more street trees – even if it takes out parking spaces		
		We need to look at ways of enforcing 20mph on QPR rather than simply calming traffic. We need to keep it obstacle-free but there are still people who drive very fast without repercussion	How does adding central hatching etc reduce speed?	
				Streets are blocked by wheelie bins – dangerous and not suitable for QPR.  More regular rubbish collections and communal bins.
				Junction of Southover Street & QPR has had no consideration despite being busiest junction
			Pollution is a problem as cars will keep engines running on QPR as people go to nursery/pharmacy. Pollution is a problem and greening would be great	
			Why no zebras on QPR?	Experiment with French style regular zebras all along QPR rather than more islands

Location	Session 1 Online	Session 2 – St Luke’s School	Session 3 - Online	Session 4 – Elm Grove School
	Potential for issues around refuges at road junctions/corners. Sussex St/Richmond St end. Residents parking on west side. People park at the end of residents parking bay rows – if a refuge is there parking either blocks road or parks on pavement. Refuges need bollards to prevent parking on them.	Junction of Richmond St/QPR dangerous because of parked cars causing poor visibility for traffic emerging from Richmond St.  Need enforcement of 20mph limit		Can the south bound bus stop be moved further up the road?
	Top of Islingword Road – build out proposal. Drays need to get to constant service and islingword pub – build outs and island may be too tight.			New traffic island on QPR near Islingword – cars can currently pass busses – an island would prevent this and cause queues.  The post office requires vehicles to park outside for cash delivery.
	Tree planting outside Pepperpot would reduce visibility of local landmark			Is the taxi rank needed on QP Terrace/QPR junction. Space here for cycle hangar/bike share instead of Pepperpot lawn
	St Luke’s Terrace ped refuge – don’t want beeping puffins but a zebra might be good.			
			Why no trees shown on QPR between Downs Terr and Pepperpot	Yes to trees south of Islingword. Trees instead of bins
<b>Egremont Place</b>	Crossing at top of Egremont place – feels quite dangerous even though there is an island because of poor visibility on bend. This could be a priority area for improved crossing?		Crossing at QPR/Egremont. Getting off bus at QPR and crossing a problem – can’t see round the corner. Slowing traffic is v important and safer crossing for pedestrians is needed here.	Junction refuge at Egremont Rd is really dangerous – first cars come from both directions and pedestrian views are obscured. Need lights?
	Egremont Gate – could all 4 directions be crossed at once with 4 way controls? Like			

Location	Session 1 Online	Session 2 – St Luke’s School	Session 3 - Online	Session 4 – Elm Grove School
	Oxford Circus – cross any direction & all direction stopping?			
	Egremont Place – the majority of residents discussion on Whatsapp has been Egremont place and concern about extra traffic. Too narrow for buses to pass & parked cars get damaged. Coal holes beneath pavement are also being damaged. Could buses be re-routed to Mount Pleasant /Freshfield Road? Could traffic lights be put at the top of Egremont – create a ped crossing? One way entry in/out of West Drive?	<p>Make Egremont Place single flow by introducing lights on QPR</p> <p>Reroute some buses into Freshfield Road</p> <p>Reroute bus number 23 along Freshfield Rd and Queen’s Park Terrace</p>		<p>Egremont Place west side needs a cycle lane for cyclists climbing uphill. Ideally separated and would need all parking to be removed.</p> <p>Need seating for people walking</p>
		Displace car traffic from Egremont Place with a bus gate and requiring cars to use Freshfield/Mount Pleasant.		Upper Park Place is one way north and could see traffic displaced from Egremont making this junction even busier
Area wide			Are pollution levels being monitored?	
			Worried about increase in traffic – would like to see traffic reduction on boundary roads built in to the scheme targets and success criteria	Need more car share schemes and EV points
		What is needed is behaviour change to reduce people owning cars – that would reduce traffic, not just slow it down		Blues & Two’s needs challenging – we don’t have an ambulance station on Elm Grove anymore so could we have humps?

Location	Session 1 Online	Session 2 – St Luke’s School	Session 3 - Online	Session 4 – Elm Grove School
		QPR/Elm Grove proposals sound good, but very important to reduce speeds.		
		Pavement surfaces terrible in whole area – a real issue for accessibility		
		Accessible bus stops essential		
		Street furniture and surfaces – pavement surfaces poor and present trip hazard. Need benches placed on hills		
		More measures to encourage walking – street lights, handrails, community spaces		There is no mention of cycle lanes on QPR or Elm Grove and there should be
		Can we look at using moss instead of trees it is more immediate, takes less space, needs less maintenance and you don’t get bird droppings with it.		



# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 29

**Subject:** A23 Phase 1 Active Travel Scheme - TRO-26-2023

**Date of meeting:** 3 October 2023

**Report of:** Executive Director Economy, Environment & Culture

**Contact Officer:** Name: Jazmine Hayes  
Email: [jazmine.hayes@brighton-hove.gov.uk](mailto:jazmine.hayes@brighton-hove.gov.uk)

**Ward(s) affected:** Preston Park

**For general release**

### 1. Purpose of the report and policy context

- 1.1 This report seeks committee approval for the making of a Traffic Regulation Order (TRO) for the Active Travel Funded A23 Phase 1 Walking, Cycling and Accessibility Improvement scheme (A23 Active Travel Scheme). It outlines the results of the TRO consultation as required for alterations to the Public Highway for implementation.
- 1.2 Central government released their 'Gear Change' vision document in July 2020 setting out the national ambition to make walking, wheeling and cycling the natural choice for short journeys, or as part of a longer journeys. This was accompanied by Local Transport Note 1/20 (LTN 1/20) which sets out a step change in how Local Authorities must deliver cycling improvements. These three policy documents have been utilised when designing the proposed improvements along with feedback from residents, businesses and stakeholder groups

### 2. Recommendations

- 2.1 That the Committee, having taken account of all duly made representations and comments, agrees that TRO-26-2023 is approved and can proceed to implementation stage for Parking Permit Zone J changes only, with the amendments to the Parking Permit Zone Q arrangement, as detailed at Section 4.3 and Appendix 3 being pursued by officers under a future TRO.
- 2.2 That the committee delegates authority to officers to commence the A23 Active Travel Scheme Phase 1 (Phases 1a and 1b) to the construction phase and to procure the Works Contract under the authority of the Executive Director, subject to available funding.

### 3. Context and background information

- 3.1 The A23 Active Travel Scheme is being delivered with the Department for Transport's (DfT) Active Travel Fund (ATF). This scheme forms part of the Tranche 2 Active Travel Fund. This project aims to introduce permanent

alterations to the highway to improve access and encourage active and inclusive travel such as walking, wheeling and cycling. The scheme will also provide benefits for other sustainable transport options including bus users whilst also providing safety improvements for all road users, including motor vehicles.

- 3.2 Of the £2.367m funding provided by the DfT for Tranche 2 of the ATF, £909,000 has been allocated to the A23 Active Travel Scheme. Further funding has also been secured from Section 106 developer contributions and the Council's Local Transport Plan capital budget.
- 3.3 The A23 is a key strategic transport corridor for sustainable travel, identified in the Local Cycling and Walking Infrastructure Plan as priority route 4 and is part of the National Cycling Network (NCN 20).
- 3.4 In addition, the Council has committed to being net carbon neutral by 2030, the Carbon Neutral Programme identifies the transport sector for the largest share of the required cut in carbon emissions in the City and includes a key action to develop a public realm which enables active travel.
- 3.5 The citizens' Climate Assembly, held in autumn 2020, noted a representative group of residents' own recommendations for improvement. This included 'cyclists should be prioritised over cars through well designed cycle networks that are safe and practical for day-to-day use as well as leisure' and the 'creation of healthier low traffic/pedestrianised communities'.
- 3.6 At the Special Environment Transport and Sustainability (ETS) Committee meeting held on 18 December 2020 the Committee agreed to progress work on the five schemes presented in the 'Emergency Active Travel Fund – Tranche 2 Transport Schemes and Plans for Consultation' Report, of which the A23 Active Travel Scheme was included.
- 3.7 In February and March of 2021, a six-week citywide public consultation was undertaken and the results were reported back to ETS Committee on 2 July 2021, along with preliminary designs for the A23 as part of the 'Active Travel Fund' report.
- 3.8 The Committee agreed to the preliminary design for the A23 Active Travel Scheme and instructed officers to undertake further public consultation and return to a future ETS Committee with detailed design recommendations on the scheme.
- 3.9 During the preliminary design stage, the scheme was separated into three phases;
  - Phase 1 – The junction of Preston Road (A23) & Argyle Road to the junction of Preston Road (A23) & Cumberland Road
  - Phase 2 – The junction of London Road (A23) & Cumberland Road to the junction of London Road (A23) & The Deneway
  - Phase 3 – The junction of London Road (A23) & The Deneway to just south of the junction of London Road (A23) & Mill Road.

- 3.10 Officers undertook further consultation with residents, businesses and stakeholders from October to December 2021 and results were presented at ETS Committee in March 2022. This included a recommendation that the committee approved the A23 Phase 1 design as presented and officers could subsequently proceed with advertising the associated TRO.
- 3.11 A final round of engagement took place across Spring 2023 and this meaningful stakeholder feedback was incorporated, where possible, into the final design for A23 Active Travel Scheme Phase 1.
- 3.12 Following the final design process, due to affordability, Phase 1 has been split into two further phases: 1a and 1b. Phase 1a encompasses Argyle Road to north of the Stanford Avenue junction and Phase 1b encompasses north of the Stanford Avenue junction to south of the Preston Drove junction. The scheme will be progressed in chronological order with current funding priority given to Phase 1a. Phase 1b will be progressed if future funding becomes available. Current design drawings can be seen at Appendix 5.
- 3.13 To enable the scheme delivery, TRO-26-2023 was advertised to enable legal enforcement of the proposed changes to parking and waiting restrictions within the scheme boundaries. The TRO was advertised from 19 May 2023 for a period of 21 days. Details of the advertised order can be seen in Appendix 1.

#### **4. Analysis and consideration of alternative options**

- 4.1 The main alternative option would be to not approve the TRO. This would risk the effective progression of the scheme and implementing changes as requested in the TRO comments would jeopardise the potential to achieve an LTN 1/20 compliant scheme, which is a funding requirement. Moreover, this would be contrary to the wishes of the local businesses, active travel forums and others in the area who have been supportive of this measure when engaging with the Council.
- 4.2 Further to analysis of the responses received to TRO-26-2023, consideration has been given to amend the proposal for Zone Q changes on Dyke Road Drive. Officers therefore propose not proceeding with the original changes proposed on Dyke Road Drive under TRO-26-2023 and instead implementing the revised arrangement that can be seen at Appendix 3 via a future TRO.
- 4.3 The revised proposal has been developed following feedback received from local businesses. Notably that there is the need for additional disabled parking provision for patients receiving treatment at the denture specialist clinic on the corner of Dyke Road Drive and Preston Road (Parking Permit Zone Q). This revised arrangement provides more space for all road users on the approach to the junction.
- 4.4 The second most common response theme related to a perception that the cycle lane was not continuous at the Dyke Road Drive junction. This is not correct and officers provided further explanation to these respondents that

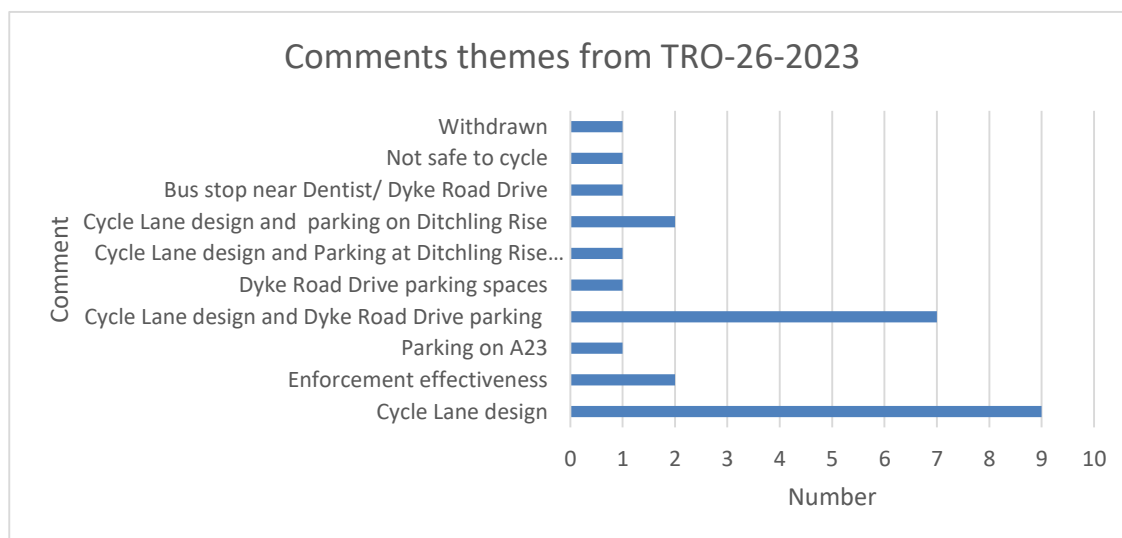
priority is continuous for those using the cycle lane across Dyke Road Drive. As these comments are not related to the proposed changes advertised under the TRO they are not considered relevant.

- 4.5 Parking revenue implications have been analysed and if TRO-26-2023 is implemented, with the proposed Dyke Road Drive amendments as per Appendix 3, officers estimate the parking income will generate an increase in income of over £260 gain per year, compared to the current arrangement. If only Parking Permit Zone J changes are implemented then officers estimate the parking income will generate an increase in income of over £70 gain per year, compared to the current arrangement.

## 5. Community engagement and consultation

- 5.1 TRO-26-2023 was advertised on 19 May 2023 for 21 days. The Notice was advertised in the Brighton Argus, available to view and comment online and notices put up at the affected locations. Officers also engaged with several stakeholders who provided comments during the 21-day advertisement period.
- 5.2 In total 25 responses were received to the TRO consultation. Including 22 objections and 3 comments of support. A summary of the comment key themes is included below at Figure 1, full comments can be seen at Appendix 2.

**Figure 1. comment themes**



- 5.3 Of the 22 objections received most were related to the cycle lane design, as the TRO did not advertise cycle lane design for comment, these comments are not considered relevant to the principle of the TRO itself. Moreover, although 22 objections were received 82 % [18] stated in their comment that they support the scheme in principle.
- 5.4 The secondary common theme was objection to the proposed arrangement of the new parking bays on Dyke Road Drive. Objections noted a perception

that this arrangement would push cyclists into the middle of the lane on the eastbound approach and that enhanced disabled bay provision was required to serve the patients receiving treatment at the denture specialists on the corner of Preston Road and Dyke Road Drive. An alternative solution addressing the Dyke Road Drive concerns is detailed at Section 4.2 of this report.

- 5.5 The next two main concerns relate to objections to the parking bay proposal on Ditchling Rise and enforcement effectiveness. The proposed Ditchling Rise arrangement proposes one 'shared' Pay and Display and Permit Holder net increase and conversion of three current Permit Holder bays to 'shared' Pay and Display and Permit Holder bays; this has been done to mitigate potential loss to parking revenue resultant from the full TRO proposal. Enforcement effectiveness concerns are noted and the potential future 'Red Route' scheme along this route is anticipated to enhance the council's enforcement capabilities.

## **6. Conclusion**

- 6.1 TRO-26-2023 was advertised following due process and representations considered. Officers recommend that the provisions of the TRO for Parking Permit Zone J are made permanent and the proposed amendments to the Parking Permit Zone Q are pursued under a future TRO, as set out in Section

## **7. Financial implications**

- 7.1 The costs associated with the recommendations of this report will be contained within existing approved capital budgets. The capital budget of this project will be funded by DfT's ATF Tranche 2, S106 developer contributions and the council's Local Transport Plan capital budget. The Active Travel Fund Tranche 2 grant of £2.376m is funding various schemes of which the whole A23 Active Travel Scheme has been earmarked with £0.909m funding from this grant. Any significant variations to budget will be reported as part of the council's monthly budget monitoring process.
- 7.2 The TRO includes removal and changes to parking bays resulting in a negligible increase in income. This will have a small positive impact on parking income, though any significant variations to budget will be reported as part of the council's monthly budget monitoring process.

Name of finance officer consulted: John Lack    Date consulted: 18/09/2023

## **8. Legal implications**

- 8.1 The Council regulates traffic by means of orders made under the Road Traffic Regulation Act 1984. The procedure for making such orders is contained in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 which require public notice of proposed orders to be given and for the relevant documents to be placed on deposit for public inspection. Any person may object to the making of an order. The Council's Constitution provides that decisions on TROs are made by the Transport & Sustainability

Committee where there are either six or more unresolved objections or the matter has been called in.

Name of lawyer consulted: Katie Kam

Date consulted: 14/09/2023

## **9. Equalities implications**

- 9.1 An Equalities Impact Assessment has been carried out and approved, see Appendix 4.

## **10. Sustainability implications**

- 10.1 The report recommendations in the context of the wider Active Travel scheme will have a positive impact on sustainable travel and transport. The measures will improve the transport network for sustainable modes of transport by reallocating road space and enhancing pedestrian infrastructure. This will give opportunities for more people to switch to low carbon modes of transport from single occupancy cars.

## **11. Other Implications**

### **Public health implications:**

- 11.1 Enabling greater uptake of active travel across the City will provide both short and long-term benefits to the mental and physical health of residents. This approach supports the implementation of the Brighton & Hove Health and Wellbeing Strategy.

## **Supporting Documentation**

### **1. Appendices**

1. TRO-26-2023
2. TRO comments
3. Proposed Zone Q Dyke Road Arrangement for TRO amendment
4. A23 Phase 1 Active Travel Scheme Equalities Impact Assessment
5. A23 Phase 1 Active Travel Scheme Design Drawings

### **2. Background documents**

1. [Local Cycling and Walking Infrastructure Plan \(LCWIP\)](#)
2. [Emergency Active Travel Fund – Tranche 2 Transport Schemes and Plans for Consultation – ETS Report 18 December 2020](#)
3. [Active Travel Fund – Special ETS Report 21 July 2021](#)
4. [A23 Active Travel Scheme – Phase 1 – ETS Report 15 March 2022](#)

# **BRIGHTON & HOVE CITY COUNCIL ROAD TRAFFIC REGULATION ACT 1984**

NOTICE is hereby given that Brighton & Hove City Council ("the Council") proposes to make the Order named below under the relevant sections of the Road Traffic Regulation Act 1984, as amended, which if it comes into force will introduce various changes to the waiting or parking restrictions in the part or parts of the roads identified:

## **BRIGHTON & HOVE VARIOUS CONTROLLED PARKING ZONES CONSOLIDATION ORDER 2018 AMENDMENT ORDER NO. \* 202\* (ref: TRO-26-2023)**

### **Zone J**

- Argyle Road – Removing permit bays on the north side and extending the double yellow lines and the extension of the shared parking bay on the south side near the junction with Preston Road.
- Ditchling Rise – Removing disabled parking bay on the north side and replacing it with a shared bay and changing the permit bays to shared bays on the south side near the junction with Preston Road.
- Preston Road – Removing a section of the shared bays and replace with a loading bay on the north side outside No.74 and the extension of shared bays outside No.88.

### **Zone Q**

- Dyke Road Drive – Removal of double yellow lines and the installation of 2 shared parking bays on the north side near the junction with Preston Road

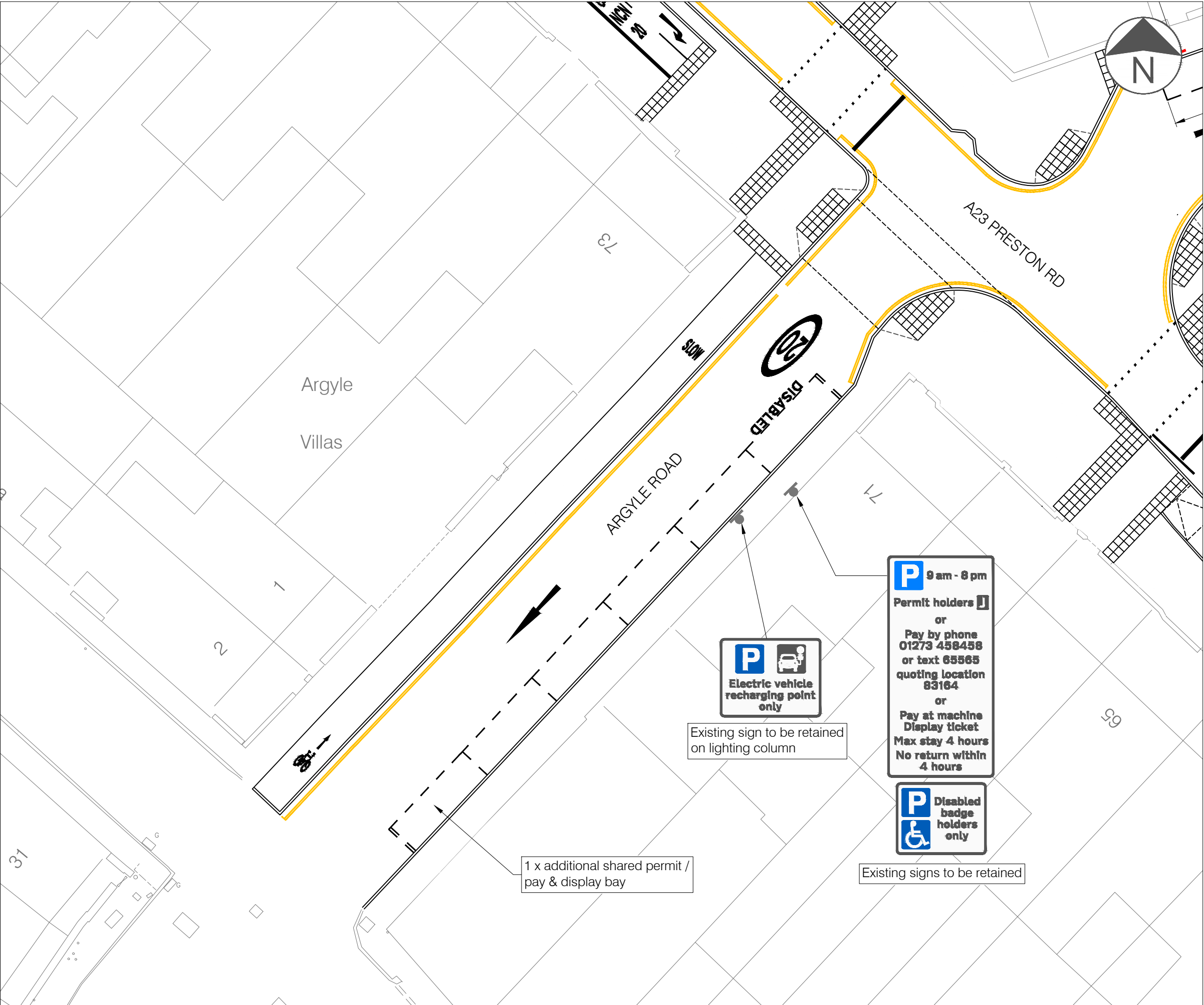
A copy of this Notice, the proposed Orders, plans showing the lengths of road affected and a statement of the council's reasons for proposing to make the Orders may be seen online at [www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros).

All objections and other representations relating to the proposed Orders must be made in writing and all objections must specify the grounds on which they are made and should be sent to the Executive Director Economy, Environment & Culture, Brighton & Hove City Council Parking Design & Implementation, Room G40, Hove Town Hall, Norton Road Hove, BN3 3BQ quoting the TRO reference number shown above or by e-mail to [TROcomment@brighton-hove.gov.uk](mailto:TROcomment@brighton-hove.gov.uk) or online (see details above) no later than 9<sup>th</sup> June 2023. Please ensure you include your full name and address.

Dated: 19<sup>th</sup> May 2023  
Executive Director Economy, Environment & Culture  
Brighton & Hove City Council  
c/o Parking Design & Implementation  
Room G40  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ  
[www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros)







**LEGEND**

- Proposed Road Markings
- Proposed Double Yellow Lines
- Proposed Road Sign
- Existing Road Sign to be retained

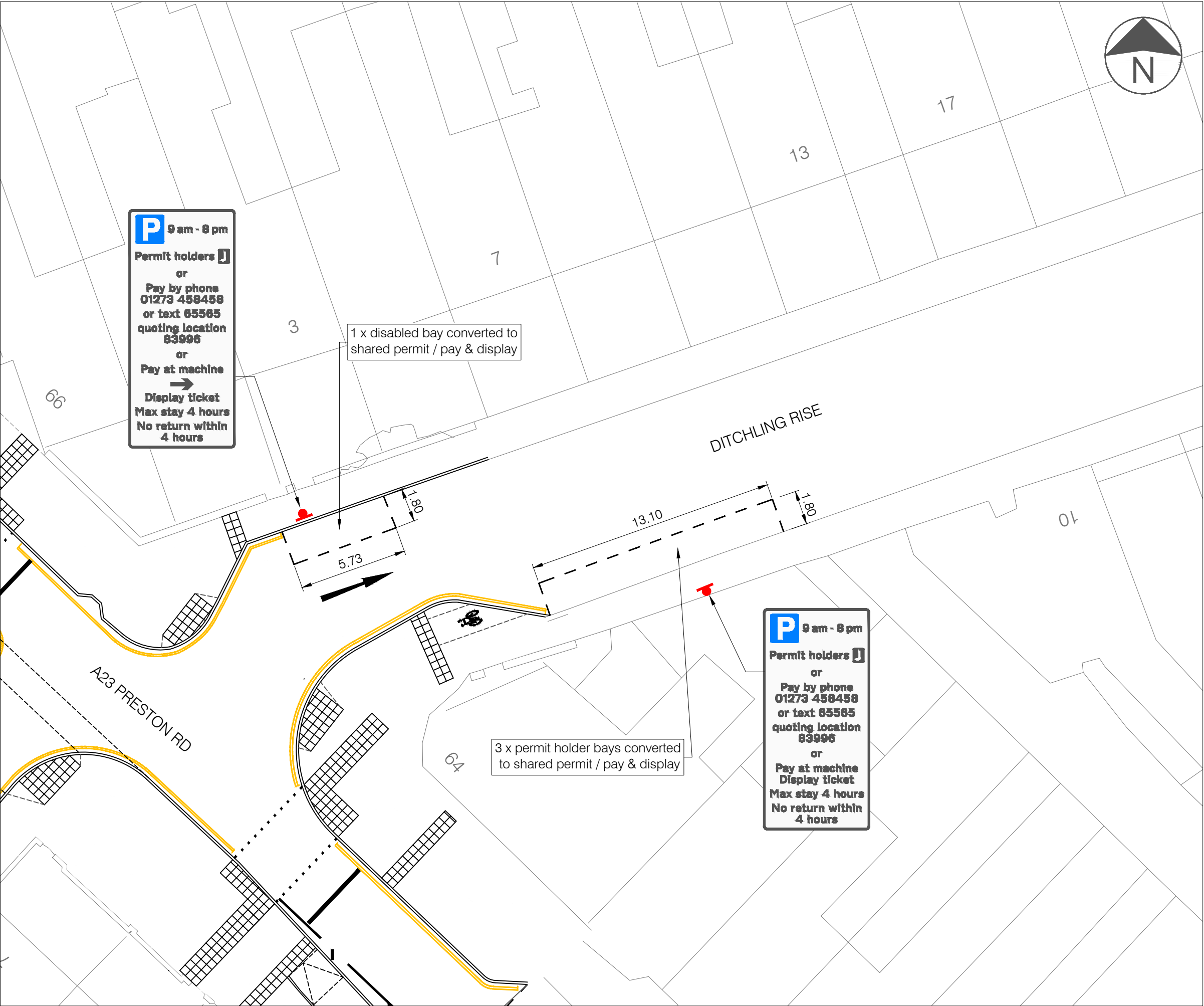
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A	24.03.23	FIRST ISSUE	IC	RF	DP
Rev	Date	Description	Drn	Chk	App
This drawing has been specifically prepared to meet the requirements of the named client and may contain design and innovative features which differ from conventional design standards.					

PROJECT CENTRE

www.marstonholdings.co.uk/projectcentre

Client					
Project	A23 PEDESTRIAN / CYCLE IMPORVEMENTS				
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Drawing Status	FOR INFORMATION				
Drawn	Designed	Date	Scale	Size	
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Drawing No.	Rev				
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LEGEND

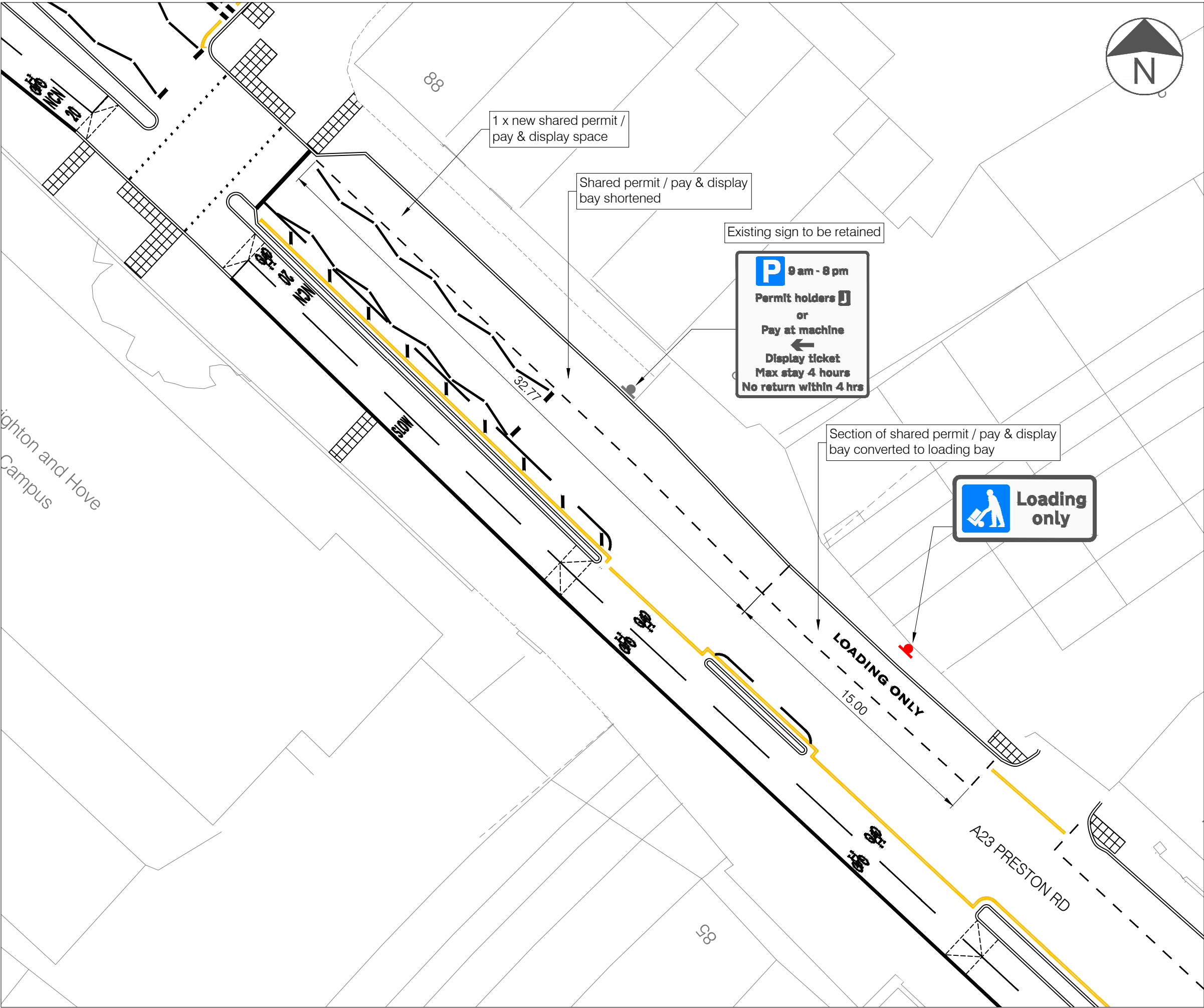
- Proposed Road Markings
- Proposed Double Yellow Lines
- Proposed Road Sign
- Existing Road Sign to be retained

B	24.04.23	UPDATED FOLLOWING BHCC COMMENTS	IC	RF	DP
A	24.03.23	FIRST ISSUE	IC	RF	DP
Rev	Date	Description	Drn	Chk	App
This drawing has been specifically prepared to meet the requirements of the named client and may contain design and innovative features which differ from conventional design standards.					

PROJECT CENTRE

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Client					
Project					
A23 PEDESTRIAN / CYCLE IMPORVEMENTS					
Drawing Title					
TRO PLAN DITCHLING RISE					
Drawing Status					
FOR INFORMATION					
Drawn	Designed	Date	Scale	Size	
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Drawing No.					Rev
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**LEGEND**

- Proposed Road Markings
- Proposed Double Yellow Lines
- Proposed Road Sign
- Existing Road Sign to be retained

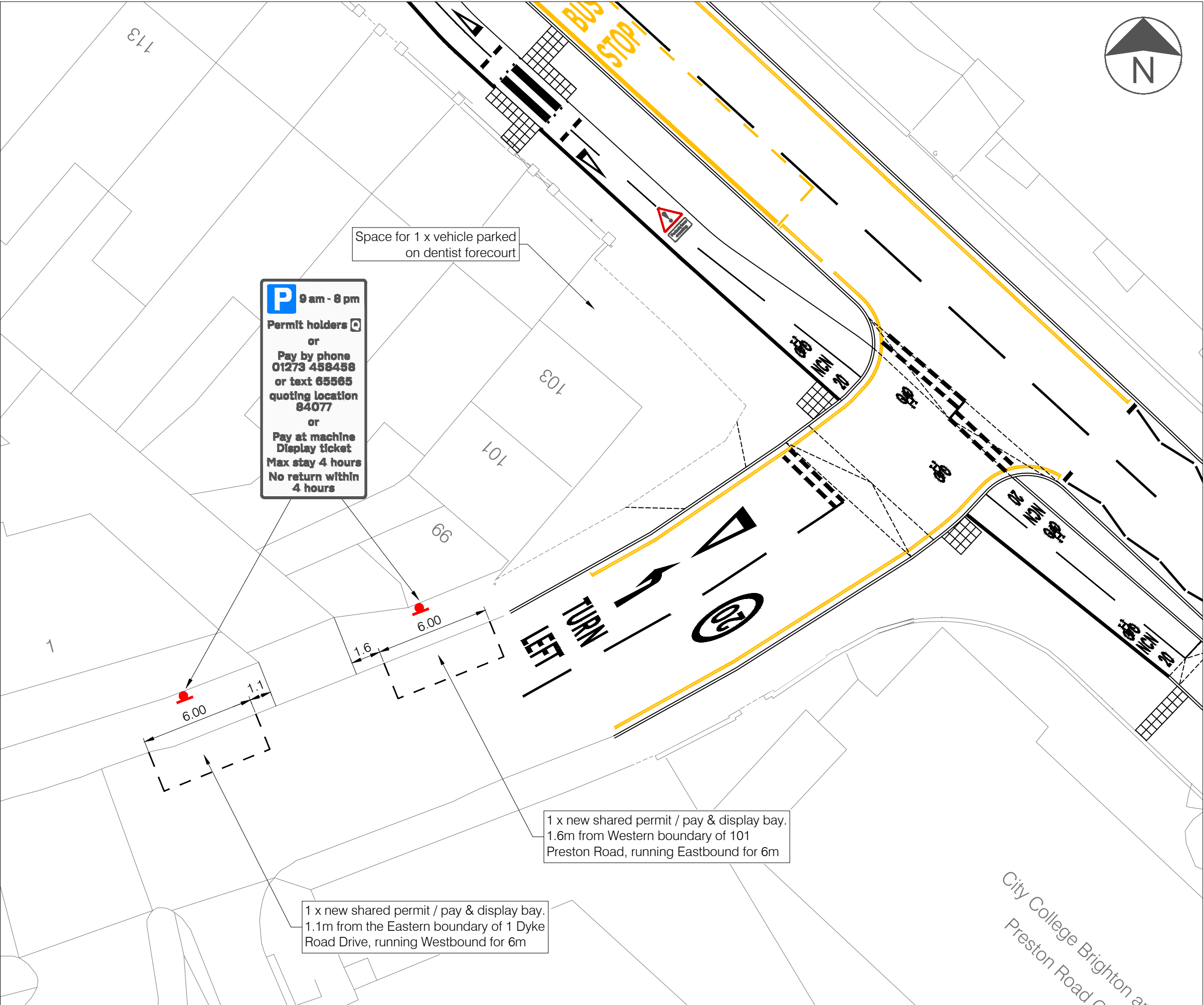
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A	24.03.23	FIRST ISSUE	IC	RF	DP
Rev	Date	Description	Drn	Chk	App
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PROJECT CENTRE

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Client				
Project				
A23 PEDESTRIAN / CYCLE IMPORVEMENTS				
Drawing Title				
TRO PLAN PRESTON ROAD				
Drawing Status				
FOR INFORMATION				
Drawn	Designed	Date	Scale	Size
IC	RF	MAR 23	1:200	A3
Drawing No.				Rev
1000008737-TRO-03				B

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**LEGEND**

- Proposed Road Markings
- Proposed Double Yellow Lines
- Proposed Road Sign
- Existing Road Sign to be retained

C	24.04.23	UPDATED FOLLOWING BHCC COMMENTS	IC	RF	DP
B	27.03.23	UPDATE FOLLOWING BHCC COMMENTS	IC	RF	DP
A	24.03.23	FIRST ISSUE	IC	RF	DP
Rev	Date	Description	Drn	Chk	App
This drawing has been specifically prepared to meet the requirements of the named client and may contain design and innovative features which differ from conventional design standards.					

PROJECT CENTRE

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Client

Project

A23  
PEDESTRIAN / CYCLE IMPORVEMENTS

Drawing Title

TRO PLAN  
DYKE ROAD DRIVE

Drawing Status

FOR INFORMATION

Drawn	Designed	Date	Scale	Size
IC	RF	MAR 23	1:200	A3

Drawing No.

1000008737-TRO-04

Rev

C



## TRO-26-2023 A23 Active Travel Phase 1 - TRO Comments Analysis

Object/Support	Comment
Object	object to some elements of the changes to parking within the TRO. The main objection is that parking would be allowed too close to the pedestrian/toucan crossing at Springfield Road. The point of the zig zag marking the "crossing controlled area" is that no vehicles can park here as it prevents visibility of the crossing, and therefor impacts on safety. Yet in this order it is proposed to allow parking adjacent to the zig zags along the entire length of the crossing controlled area, which isn't allowed. The zig zags could be shortened to a single set (4m), but the proposed arrangement is not acceptable. Ultimately there should not be any parking allowed along the A23 as it is a critical route in the city for all road users, plus parked vehicles can get in the way of emergency vehicles passing congested areas. Also the new parking bays along Dyke Road Drive will impact of traffic flow, so I also object to those.
Support	think I support all these proposals, but particularly those that add more DYLS. However, the enforcement of loading bays in B&H is absolutely parlous. Look at any 'Loading only' bay in Brighton and 90% of the time it has a range rover in it with the driver nowhere to be seen and zero loading going on. You can also often find 7 or 8 vehicles parked on DYLS and blocking the (unprotected) cycle lane, and drivers aren't even nervous about getting a ticket because they know how little enforcement there is. As for the pavement parking on Madeira drive, the law is an absolute joke. :(
Object	I strongly support the "beefing up" of this cycle lane which I use pretty well every day. There are many places where the current arrangements are dangerous, but sadly at two of these, the Dyke Road Drive and Argyle Road junctions, the new proposal is still really inadequate and will still be dangerous for pedestrians and cyclists, because the priority is not clear and, whilst it's fine to have "shared spaces" the lack of space here, and the complexity of the junctions (eg so many cars exiting Springfield Road and jinking right then left into Dyke Road Drive. There should be clear priority for cycles and pedestrians at these junctions and then we would all know what to look out for.
Object	While I support the above scheme in general and would not like it to be delayed there are some flaws, including at the junctions with Argyle Road and Dyke Road Drive where the plans show the lane being interrupted.
Object	Although I am in overall support of the A23 Phase 1 London Road cycle lane in general, and do not wish to see a delay in implementation, I am very concerned about the interrupted junctions at Argyle Road and Dyke Road Drive. These are extremely dangerous points on this cycle lane, and need to be clear and uninterrupted for the safety of all. I hope these amendments can be implemented.
Object	<p>In general I support phase 1 of the A23 cycle lane and don't want it to be delayed. However, TRO-26-2023 seems to show a number of changes that I don't think are safe for cyclists.</p> <p>Firstly, the new positioning of parking in dyke road drive would force eastbound cyclists towards the centre of the road where westbound motorists tend to drive.</p> <p><b>Secondly, the plan suggests that the cycle lane would be interrupted at the junctions with argyle road and dyke road drive. The cycle lane should instead be continuous as this would improve cyclist safety.</b></p>
Withdrawn	<p>I oppose the TRO-26-2023, but support the A23 Phase 1 London Rd cycle lane in general, and so I do not want it to be delayed at all. As currently configured the details in the TRO threatens to undermine safe, easy cycling on the new protected lane.</p> <p>The new protected lane should be continuous, like the adjacent carriageway, but TRO-26-2023 makes it look like it would be interrupted at junctions with Argyle Rd and Dyke Rd Drive. The interruptions would increase collision risks and significantly reduce ease of cycling.</p>
Object	<p>While I fully support the overall scheme (A23 Phase 1 London Rd cycle lane) there a number of issues with this TRO.</p> <p>The route should be continuous but the interruptions for junctions - Argyle Rd and Dyke Rd Drive - will increase collision risk and make the scheme less safe.</p> <p>The parking bays on Dyke road drive would make the scheme less safe for cyclists - forcing east bound cyclists into the centre of the road.</p>
Object	<p>It threatens to undermine safe, easy cycling on the new protected lane.</p> <p>The new protected lane should be continuous, like the adjacent carriageway, but TRO-26-2023 makes it look like it would be interrupted at junctions with Argyle Rd and Dyke Rd Drive. The interruptions would increase collision risks and significantly reduce ease of cycling. The TRO plans also show changes to parking bays on Dyke Rd Drive and they'd force eastbound cyclists towards the centre of the road, where westbound motorists tend to drive. It's not safe.</p>

Support	3
Object	22
Total	25



## TRO-26-2023 A23 Active Travel Phase 1 - TRO Comments Analysis

Object	<p>I support the A23 Phase 1 London Rd cycle lane in general and would like to see it proceed. However I request a review of the following as I think it threatens to undermine safe, cycling on the new protected lane.</p> <p>The new protected lane should be continuous, but TRO-26-2023 makes it look like it would be interrupted at junctions with Argyle Rd and Dyke Rd Drive. The interruptions increase collision risk and significantly reduce ease of cycling. Existing cycle schemes have these discontinuities which increases danger to cyclists and makes them less likely to be used. We should seek to avoid repetition of these mistakes.</p> <p>The TRO plans also show changes to parking bays on Dyke Rd Drive which will push eastbound cyclists towards the centre of the road, where westbound motorists tend to drive. It's not safe. There must be a better solution.</p>
Object	<p>Whilst I support the A23 Phase 1 London Rd cycle lane and do not wish it to be delayed, I object to this TRO as it will break the cycle lane and the parking spaces planned will force cycling residents out into traffic. If you are going to do a cycle lane, then please do it properly and completely.</p>
Object	<p>Zone Q</p> <ul style="list-style-type: none"> <li>• Dyke Road Drive – Removal of double yellow lines and the installation of 2 shared parking bays on the north side near the junction with Preston Road</li> </ul> <p>Though I support the rest of the proposal, I object to this part because it creates danger for cyclists. In this proposal, no account is taken of the heavy usage of Dyke Road Drive by cyclists. Dyke Road Drive is one of the most popular east-west routes for cycling in this part of the city, though no provision is made for it. Though it is a street in which a great deal of anti-social driving takes place due to the parking design, it remains the least steep incline for cyclists to travel west on and so is heavily used - more than many of the routes where cycle provision has been made.</p> <p>When descending Dyke Road Drive and trying to turn south, cyclists have to compete with vehicles speeding to the junction at Preston Road. Having to negotiate parked cars at the junction makes the route more hazardous.</p>
Object	<p>I support the improvements in printiple but:</p> <p>The new protected lane should be continuous, like the adjacent carriageway, but TRO-26-2023 makes it look like it would be interrupted at junctions with Argyle Rd and Dyke Rd Drive. The interruptions would increase collision risks and significantly reduce ease of cycling.</p>
Object	<p>I support the A23 Phase 1 London Rd cycle lane in general but feel the Argyle Rd and Dyke road Drive interruption to cycle flow could lead to more accidents.</p>
Support	<p>I support this proposal in general and want it to be implemented as soon as possible, so that I, my family and neighbours can finally cycle safely on a route that I use every day and always worries me. BUT: PLEASE DO NOT FORCE CYCLISTS GOING STRAIGHT ON, ON THE NEW CYCLE PATH BESIDE PRESTON ROAD, TO GIVE WAY TO ROAD USERS TURNING INTO OR OUT OF ARGYLE ROAD AND DYKE ROAD DRIVE. This is contrary to the Highway Code, LTN 1/20 and common sense, and it's extremely dangerous. Please also do not move car parking spaces on Dyke Road Drive into areas that force cyclists out into fast moving motor traffic coming in the opposite direction. Dyke Road Drive has had a speeding car problem for as long as I've lived in this area (30 years) despite it having an effectively blind corner. Rather than moving parking places, how about removing some and adding speed controlled traffic lights? It could default to green for all vehicles travelling at or below 20mph, but go red when it senses traffic going faster. Put one at the top of the hill and one at the bottom.</p>
Object	<p>I support the A23 Phase 1 London Rd cycle lane in general and do not want it to be delayed at all. However this TRO needs to be re-worked.</p> <ol style="list-style-type: none"> <li>1) The new protected lane should be continuous, like the adjacent carriageway, but TRO-26-2023 makes it look like it would be interrupted at junctions with Argyle Rd and Dyke Rd Drive. The interruptions would increase collision risks and significantly reduce ease of cycling.</li> <li>2) The linkage from the contra flow cycle lane on Ditchling Rise to the main cycle lane is still poorly designed - it doesn't extend properly around the parking and it should all join up in clearly-marked lanes.</li> <li>3) Generally, this whole "shared space" idea at Argyle Rd/Ditchling Rise is a mess.</li> <li>4)Permit parking is in short supply on Ditchling Rise and it is very difficult to park NOW. I object to making the bays shared pay and display.</li> </ol>

## TRO-26-2023 A23 Active Travel Phase 1 - TRO Comments Analysis

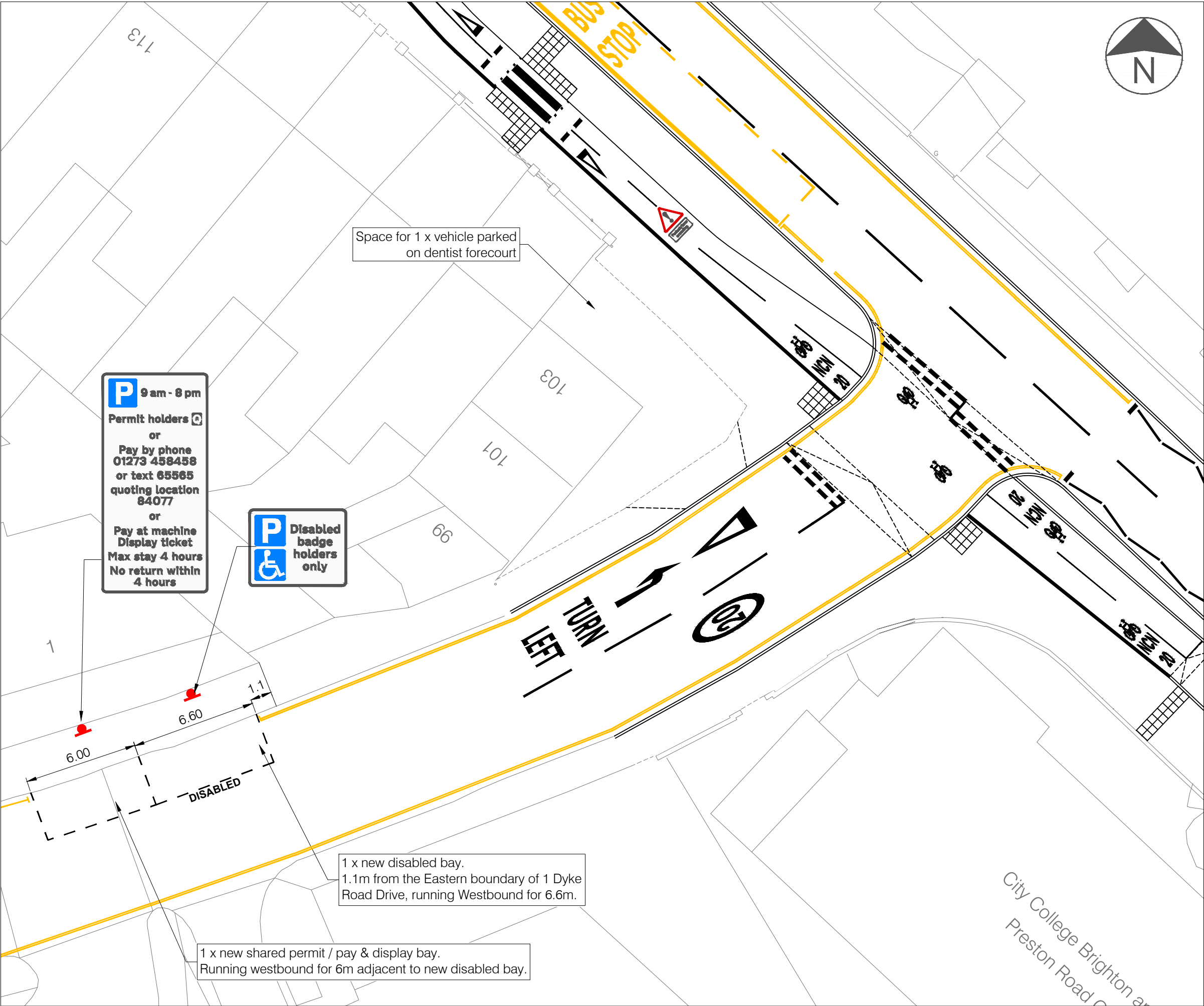
Object	<p>Cycling and walking first. Amsterdam, London and potentially Brighton.</p> <p>even where there is an uninterrupted bike lane @ Coombe Road on A27, it just allows cars to double park. Enforced bike lanes to ensure cyclists safely.</p> <p>I am a car owner too.</p>
Object	<p>These proposals are not in line with current design standards set out by Gear Change strategy. Cycle lanes should be continuous with priority for cyclists. This TRO will make cycling on London Road more dangerous and increase the chances of collisions, therefore I strongly object to these changes.</p>
Object	<p>Not safe to cycle</p>
Support	<p>I support the A23 Phase 1 London Road cycle lane and I am keen to see it completed. However, the parking bays changes proposed in Ditchling Rise and Dyke Road Drive are likely to send cyclists to the middle of the road, risking collisions with cars.</p>
Object	<p>I support the A23 Phase 1 London Road cycle lane in general, but oppose the TRO 26 for the following reasons:  The Argyle Road and Dyke road Drive junctions appear to interrupt the cycle lanes. This could cause confusion and increase the potential of accidents especially as the new Highway Code guidelines suggest that cyclists AND pedestrians have right of way when crossing a junction along a main road. Any pinch points in cycling infrastructure serves to put off unconfident cyclists rather than encourage them.  The changes to the parking bays under the viaduct and on Ditchling Rise would also encourage more visitor parking and further endanger cyclists by forcing them into the centre of the road in conflict with cars.</p>
Object	<p>I do support the A23 Phase 1 London Rd cycle lane in general and do not want it to be delayed at all. However there are safety flaws with the TRO. The new protected lane should be continuous, like the adjacent carriageway, but TRO-26-2023 makes it look like it would be interrupted at junctions with Argyle Rd and Dyke Rd Drive. The interruptions would increase collision risks and significantly reduce ease of cycling.  The TRO plans also show changes to parking bays on Dyke Rd Drive and they'd force eastbound cyclists towards the centre of the road, where westbound motorists tend to drive. This is not safe.</p>
Object	<p>Overall I welcome the proposed new A23 London Road Phase 1 cycle lane, as any provision to make cycling safer is much appreciated. However, I am concerned about the interruptions to the cycle lane at Argyle Road and Dyke Road Drive which means the cycle lane would not be continuous. I think this would be a danger for cyclists using the lane. I am also concerned about the proposed parking bays on Dyke Road Drive, which would result in cyclists having to pull out into the road. If these amendments could be implemented, it would complete an otherwise excellent scheme.</p>
Object	<p>It appears to interrupt junctions at Argyle Road and Dyke Road Drive  I fully support the bicycle lane on the London Road and look forward to using a safe, secure route</p>
Object	<p>The location of the new bus stop on the plans has been put in front of the dental surgery as possibly you feel there is more space as our boundary is not correctly marked on the maps (we will contest this) The space for the walk way adjacent to the bus stop when the residential bins are put out will be very minimal, and we feel will be dangerous for pedestrians. We can see no reason the Bus stop could not be a further 10m up Preston road towards the park as its current location will have a massive impact on the junction especially people turning left out of Dyke road drive. The loss of the dental practice parking we feel will have a large impact on the elderly community receiving treatment as we specialize in dentures. Patient care is our priority and we feel that this removing our current amount of disabled parking bays will reduce the amount of care we can offer. We are a referral practice receiving elderly pts from Eastbourne to Worthing for treatment.</p>

TRO-26-2023 A23 Active Travel Phase 1 - TRO Comments Analysis

Object	<p>I am strongly in support of the aim of improved active travel infrastructure. The whole A23 route is in urgent need of re-design. I DO NOT object to controlled parking, no parking or double yellow lines. My points are about using junctions as a cyclist.</p> <p>The TRO isn't properly dealing with cycling to/from and at side roads off Preston Road i.e. Dyke Road Drive and Ditchling Rise.</p> <p>The Statement of Reasons should have included reference to LTN1/20 design standards.</p> <p>People cycling need to have priority over motor vehicles, and this needs to be more clearly reflected in the design e.g. with the cycle lane going across the bottom of Dyke Road Drive.</p> <p>Dyke Road Drive is also used by people cycling up and down (and it avoids the unpleasant and congested New England Road). However, the proposed new parking spaces at the bottom of Dyke Road Drive combined with drivers' going too fast and taking a path regardless of people cycling, will cause cyclists to be squeezed into inadequate space and increase the risk of collisions. There are several other safety issues i.e. the increased risk of dooring, drivers manoeuvring in and out of parking spaces causing a hazard, cyclists facing oncoming traffic and the pre-existing unhelpful camber of the road.</p> <p>The proposal for the western end of Ditchling Rise also has parking in the wrong places making it awkward for cycling, as people are supposed to go round parked cars and face oncoming vehicles. The arrangement is not good at present either, of course, but we are hoping to see greater improvements. People won't necessarily want to come off the road into shared space if they're aiming to turn right or go across to Argyle Road, but it looks like this is expected in the proposal.</p> <p>The junction of Argyle Road and Ditchling Rise junction needs to be better aligned for people to cycle across.</p> <p>Springfield Road needs to be made two way for cycling so that the toucan at the junction with the A23 has greater value i.e. permits onward eastbound journeys.</p> <p>In general, I am in support of the changes to Preston Road and the A23 otherwise.</p>
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Space for 1 x vehicle parked on dentist forecourt

**P** 9 am - 8 pm  
Permit holders   
or  
Pay by phone  
01273 458458  
or text 65565  
quoting location  
84077  
or  
Pay at machine  
Display ticket  
Max stay 4 hours  
No return within  
4 hours

**P** Disabled  
badge  
holders  
only

1 x new disabled bay.  
1.1m from the Eastern boundary of 1 Dyke  
Road Drive, running Westbound for 6.6m.

1 x new shared permit / pay & display bay.  
Running westbound for 6m adjacent to new disabled bay.

LEGEND

- Proposed Road Markings
- Proposed Double Yellow Lines
- Proposed Road Sign
- Existing Road Sign to be retained

Rev	Date	Description	Drm	Chk	App
D	07.06.23	UPDATED FOLLOWING BHCC COMMENTS	LG	RF	DP
C	24.04.23	UPDATED FOLLOWING BHCC COMMENTS	IC	RF	DP
B	27.03.23	UPDATE FOLLOWING BHCC COMMENTS	IC	RF	DP
A	24.03.23	FIRST ISSUE	IC	RF	DP

This drawing has been specifically prepared to meet the requirements of the named client and may contain design and innovative features which differ from conventional design standards.

PROJECT  
CENTRE

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Client					
Project	A23 PEDESTRIAN / CYCLE IMPORVEMENTS				
Drawing Title	TRO PLAN DYKE ROAD DRIVE				
Drawing Status	DRAFT FOR DISCUSSION				
Drawn	Designed	Date	Scale	Size	
IC	RF	MAR 23	1:200	A3	
Drawing No.				Rev	
1000008737-TRO-04				D	



## Equality Impact and Outcome Assessment (EIA) Template - 2019

**EIAs make services better for everyone and support value for money by getting services right first time.**

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups<sup>2</sup>. They help us make good decisions and evidence how we have reached these decisions<sup>3</sup>.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age<sup>13</sup>) or use the hyperlinks ('Ctrl' key and left click).

**For further support or advice please contact:**

- **BHCC: Communities, Equality and Third Sector Team on ext 2301**
- **CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)**

### 1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed<sup>4</sup>.

<b>Title of EIA<sup>5</sup></b>	Active Travel Fund – Tranche 2 – A23 Phase 1	<b>ID No.<sup>6</sup></b>	EEC55
<b>Team/Department<sup>7</sup></b>	City Transport - Transport Projects & Engineering		
<b>Focus of EIA<sup>8</sup></b>	<p>Brighton &amp; Hove City Council's (BHCC) Transport Projects Team are undertaking a project to improve the Active Travel Infrastructure on the A23 between Preston Circus to the south and Preston Drove Junction to the north. Active Travel Infrastructure refers to physical highways infrastructure that is aimed towards modes of transport such as walking and cycling, for example Cycle Lanes and Footways/Pavements.</p> <p>This project's deliverables will likely have an impact on all users of the A23 and will benefit those that use Active Travel i.e., walking, wheeling and cycling the most, as safer and more user-friendly infrastructure is implemented. Further benefits are expected to be realised by local residents and the wider community via a reduction in harmful emissions and traffic volumes/noise/vibrations as it is</p>		

hoped that by providing improved active travel infrastructure, those who are able to benefit from the changes will choose to do so thus reducing reliance and volumes of motor vehicles.

Formal consultation and engagement sessions have taken place across the scheme on the designs, including:

- Initial concepts consultation in spring 2021 via an online portal for all Active Travel Tranche 2 schemes
- Face to face consultation with residents and stakeholders on the preliminary designs in December 2021
- Notification of drainage and CCTV surveys in December 2022
- Engagement with stakeholders on the detail of the design in Spring 2023

Following analysis of feedback, subsequent changes to design have been implemented where possible to make the scheme as beneficial to the highest number of people as possible. This includes but is not limited to, a discontinuation of a bus border arrangement to provide better pedestrian priority and reduce conflicts, the introduction of more formal signalised crossings to reduce safer crossing distances and, widening, where possible of cycle lanes to improve accessibility for all cycles i.e. adapted.

During the construction phase, the project may temporarily negatively affect some groups of people. These include: local residents that may be affected by noise and vibration, vehicular users of the A23 who may have their journey times extended, pedestrians who may have to use alternative routes as footways are altered, cyclists who may have to use the carriageway or another route as cycle lanes are altered and bus passengers who may experience longer than usual journeys as lane widths are reduced to accommodate contractors and their plant safely.

Early engagement with the contractor during the mobilisation phase will try to minimise any impacts. These will include:

- Warning signs to give notice of disruption.
- Letters to affected household and businesses to explain the project and give dates of any road closures etc.
- Online website (available by post, if requested) providing regularly updated information
- Alternative options provided for pedestrians and cyclists where safe and practical to do so.
- Social media updates
- Contact details available for enquiries and prompt response to any concerns.

## 2. Update on previous EIA and outcomes of previous actions<sup>9</sup>

<b>What actions did you plan last time?</b> (List them from the previous EIA)	<b>What improved as a result?</b> What outcomes have these actions achieved?	<b>What <u>further</u> actions do you need to take?</b> (add these to the Action plan below)
(This document is the initial Equality Impact Assessment). A draft was initially produced for the wider Active Travel programme but this was not specific to this design phase.	n/a	n/a

### 3. Review of information, equality analysis and potential actions

Groups to assess	What do you know <sup>10</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>11</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>12</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>13</sup> ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
<b>Age<sup>14</sup></b>	<p>Residents of Brighton &amp; Hove:</p> <p>41,735 0-15yrs (15%) 196,394 16-64yrs (71%) 38,978 65+ yrs (14%) including over 6% aged over 75.</p> <p>The city's population is predicted to get older, with the greatest projected increases by broad age band in the 60-69 years and 80-84 years categories.</p> <p>Brighton and Hove has a very different age profile compared to the South East and England.</p> <ul style="list-style-type: none"> <li>- Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%)</li> <li>- More working age adults aged 16 to 66 (72%) – South East (64%), England (65%)</li> </ul>	<p>Walking and wheeling are a free and accessible form of active travel that promotes health and wellbeing. Active travel can be part of a longer journey via train or bus. All people are pedestrians at some point of any journey that is made.</p> <p>Dedicated cycle lanes make it safer and easier for children to cycle to school.</p> <p>E-bikes provide an opportunity to get older people cycling.</p> <p>Opportunities for cycling, wheeling, and walking facilities near schools and nurseries are important, as this makes spaces more inclusive for diverse people – adults, children and families.</p> <p>Increased congestion and/or removal of parking spaces</p>	<p>It is important to create a safe environment for families travelling to school and around these settings.</p> <p>Children, younger people, and older people need a safer crossing environment to enable them to walk more easily, safely, and independently.</p> <p>Children, younger people, and older people need cycling infrastructure to be suitable to enable them to have the opportunity to cycle.</p> <p>If scheme transport measures only focus on enabling safe commuter trips, this is less likely to support older and younger people to safely reach their key destinations (e.g. schools, retail centres, healthcare settings)</p>	<p>Identify and create opportunities to reallocate road space near schools to facilitate active travel and support walking and wheeling to school.</p> <p>Work with local charities / organisations supporting older and disabled people such as BHCC Public Health colleagues and Age Concern etc to travel more actively, and safely.</p> <p>Utilise government funding secured for school transport and travel demand management to provide additional, safe public transport options for all children, including those from minoritised groups (for example, Black and Racially Minoritised, faith community, Gypsy,</p>

	<p>- Fewer older people aged over 66 (13%) – South East (17%), England (16%)</p> <p><b>Source: ONS 2021 Mid-Year Population estimates</b></p> <p>A third of young people (aged 5 to 16) are physically inactive with</p> <ul style="list-style-type: none"> <li>around 1 in 3 children are currently driven to their primary school in the city</li> </ul> <p>22 % of adults are inactive 59 % adults are overweight or obese. 16% of adults cycle once a week</p>	<p>linked to temporary changes can affect how efficiently care workers and others assisting vulnerable people can operate.</p> <p>A focus on improving commuter routes disproportionately impacts retired people and school age children whose preferred destinations are not linked to employment.</p> <p>Cycling infrastructure needs to be improved to encourage those who are not confident cyclists to travel by cycle and feel safe in doing so.</p> <p>LTP 5 consultation 2022 says: <b>Youth Council:</b></p> <ul style="list-style-type: none"> <li>- More signage on walking times to key destinations</li> <li>- Wider pedestrian crossings</li> <li>- More zebra crossings / traffic lights</li> <li>- Safer junctions / crossings near schools</li> <li>- Signs to indicate populated areas e.g. schools</li> </ul> <p><b>LPT 5 - Older people focus group:</b></p>		<p>Roma, Traveller community etc, travelling to school.</p> <p>Monitor the impact of temporary measures on levels of vehicle traffic and take steps to reduce congestion.</p> <p>The scheme has both cycling, walking, and wheeling improvements with additional signalised crossings and segregated cycle paths. These create better links to and from Preston Park and the Rockery.</p> <p>Segregated cycle lanes and footway widening will help to reduce conflicts between cyclists and pedestrians.</p> <p>During the construction phase, ensure routes to school and other significant pedestrian routes have alternative provisions or a route to it.</p>
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		<p>"It's brilliant here, have lots on our doorstep and need to be able to walk there safely"</p> <p><b>Schools LPT5 :</b></p> <ul style="list-style-type: none"> <li>- Walking feels dangerous</li> <li>- Feel unsafe walking in the evening</li> <li>- Pedestrian safety</li> <li>- narrow pavements and cars come up from behind</li> <li>- Make it safer to walk in the dark</li> <li>- Those living near to school should be encouraged to walk, those further afield get the bus</li> <li>- Lots of people walk to school, it's difficult to cross roads. More traffic lights are needed</li> <li>- Many parents are not allowing pupils to walk to school as they don't feel it's safe for children</li> <li>- Road safety e.g. crossing main roads, traffic levels</li> <li>- More zebra crossings especially near schools</li> <li>- Maps on-street to help people find their way around.</li> </ul>		
<b>Disability<sup>15</sup></b>	51,000 (22%) of adults in the city have two or more long term health conditions	Blue badge parking is needed as close as possible if existing bays are removed	Partially-sighted and blind people will not necessarily be aware of changed road layouts. To mitigate this the	Where blue badge bays are impacted, we will ensure mitigation measures are considered



	<p>Nearly one in five residents (51,797 people, 19%) in Brighton &amp; Hove are disabled as defined by the Equalities Act. This is higher than seen in both the South East (16%) and England (17%).</p> <p>Among disabled residents, for two out of five (20,351, 39%) their day-to-day activities are limited 'a lot' and for three in five (31,446 people, 61%) their activities are limited 'a little'.</p> <p>There are c.13,500 blue badge holders in the city</p> <p>There are c. 6,900 disabled concessionary bus pass holders in the city</p>	<p>for temporary / permanent transport measures.</p> <p>Loss of pay &amp; display parking negatively affects disabled car users and carers who may also have used these spaces to park with their Blue Badge/Carers badge.</p> <p>Change of 24hr disabled parking to 3hr spaces limits access to employment for disabled workers who rely on extended hours and limits the length of time disabled car users can visit areas of the city.</p> <p>Specific detail on any temporary changes to disabled parking bays needs to be publicly available as soon as possible when implementing schemes.</p> <p>The needs of drivers of larger vehicles with large mobility aids should be considered when designing disabled parking bays.</p> <p>There is a need for better cycle parking for adapted bikes used by disabled people and cycle parking should be accessible for</p>	<p>project team work closely with Sightloss South East, Guide Dogs for the Blind, Thomas Pocklington Trust and other organisations to undertake site walks and meeting to inform the design and also make their members aware of the changes along this route via their communication channels.</p> <p>We have engaged with a range of groups via the Active and Inclusive Travel Forum. This includes BADGE (Brighton Access for Disabled Groups Everywhere) BAT (Beach Access Team ) Bricycles Brighton Chamber of Commerce Cycling UK Community Works Sussex Safer Road Partnership Pedal People Buswatch UK Shoreham Port Authority Adur and Worthing Councils Sustrans Govia Thameslink Railway B&amp;H Motorcycle Action Group Living Streets Brighton and Hove</p>	<p>to reduce impacts. An example being introducing new shared bays and double yellow lines close by or relocating blue badge bays where possible.</p> <p>There may be some inconvenience for all users when construction works take place, however discussions with the contractors will help to minimise disruption and scheduling of works to reduce any impact on residents.</p> <p>We will work with the bus companies to ensure that buses can operate with minimal disruption.</p> <p>Reduce, as far as possible, any physical barriers as part of transport changes that would create accessibility issues for wheelchair users and people with mobility and sensory impairments e.g. ensuring footway extensions are flush to the existing infrastructure and dropped kerbs are</p>
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		<p>disabled people (i.e. not needing to lift bikes, etc.).</p> <p>The width of cycle lanes should safely accommodate adapted cycles and passing space.</p> <p>People with sight loss are affected by difficulties navigating and seeing changes to signage, barriers and judging distances from other people</p> <p>Obstructions on the highway and footway (e.g. A-boards, tables &amp; chairs and tree routes) put disabled road users at greater risk.</p> <p>Some disabled people rely heavily on carers to travel safely and easily around the city.</p> <p>Information shared publicly about the temporary changes must be accessible and inclusive, as well as the mechanisms for feeding back views.</p> <p>Floating bus stop arrangements and particularly those with a width below 2.5m are not</p>	<p>Enterprise Car Club B&amp;H Local Access Forum Brighton &amp; Hove Friends of the Earth/Transport Action Network Living Streets (national) Tenant Disability Group Amaze Carers Centre Zedify Sussex Ehlers-Danlos Hypermobility Syndromes (SEDS) BTN Bikeshare / Hourbike Brighton Bike Hub Guide Dogs Thomas Pocklington Trust (blind and visually impaired) Brighton Active Travel South East Community Rail Partnership Active Sussex 20 minute neighbourhoods Brighton &amp; Hove Ramblers Group Trust for Developing Communities Scope Wellsbourne Health Care CIC</p> <p>Disabled car users may not be able to access areas of the city easily / may have to travel further distances if blue badge parking bays are suspended or moved as part of temporary changes.</p>	<p>provided where appropriate.</p> <p>Ensure temporary barriers, signs and businesses do not cause obstructions on the pavement through timely enforcement action.</p> <p>Maintain access in newly pedestrianised areas for disabled people travelling in cars / taxis.</p> <p>Maintain access to existing blue badge bays wherever possible or relocate nearby if suspended within reasonable walking distances. (N.B. Disabled badge holders can park on yellow lines for up to 3hrs if not causing obstruction).</p> <p>Ensure that temporary changes do not unwittingly restrict access to other accessible facilities.</p> <p>Incorporate accessible crossings into temporary measures wherever possible.</p>
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		considered fully accessible for disabled people	<p>Where parking allocation has changed on this scheme it has been mitigated and new shared spaces have been introduced in place of, or as close as possible to amenities and the previous bays.</p> <p>Changes to the transport network may exclude disabled people from areas they were previously able to access easily. Obstructions and inaccessible cycling infrastructure may discourage disabled people from travelling actively. As the design of the scheme has progressed, cycle lanes are being provided at the widest possible size to make cycling infrastructure as accessible as possible.</p> <p>Information about the transport changes should be clear, accessible and available in a range of formats.</p>	<p>Share information about the changes with local representative groups for wider dissemination. This includes sharing information through the Active &amp; Inclusive Travel Forum.</p> <p>Increase accessibility and inclusivity of information on the changes and the mechanisms for feeding back views. Provide in Easy Read, Braille, and Large Print versions on request.</p> <p>Utilise the support and expertise of representative groups to ensure information is as accessible as possible and actions are targeted to ensure a broad spectrum of concerns are addressed.</p> <p>Maximise the width of new and existing cycle infrastructure where possible to ensure they are accessible to all types of adapted cycles with appropriate dropped kerbs for easy access.</p>
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Ensure temporary contraflow cycle lanes on the carriageway do not compromise the safety of existing controlled crossings with the use of low-level cycle signals and cycle stop lines as needed.

Ensure cycle lanes have breaks of sufficient width to allow access for larger adapted cycles and that barriers are of a suitable height not to impede sightlines.

Ensure bus stops are still accessible for visually impaired people, mobility-restricted, and wheelchair users following footway widening adjacent to bus stop infrastructure. The project team has had on site meetings with Sussex Sight loss council to discuss the hybrid bus stops and talk through any additional requirements. Where pedestrians, wheelers, and mobility-assisted people have to cross cycle lanes to access bus stop, they will always

				<p>have priority and to mitigate the likelihood of conflicts between pedestrians and cyclists the hybrid arrangements have been designed to enhance the pedestrian priority. This includes materials used on the surface, tactile paving, zebra crossings, a raised cycle lane and a reduced cycle lane width to slow cyclists and a stop line to hold the cyclists for pedestrian priority. Hybrid bus stop arrangements have been designed in accordance with the DfT's Inclusive Mobility Guidance.</p>
<b>Gender reassignment</b> <sup>16</sup>	2,341 residents aged 16+ (1.0%) identify with a gender different from their sex registered at birth	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.
<b>Pregnancy and maternity</b> <sup>17</sup>	25% of households in the city have dependent children	<p>Cycle lanes should be wide enough to accommodate cycles with child trailers/tagalongs.</p> <p>Dedicated cycle lanes make it safer and easier to cycle with children.</p>	A significant number of people may need / choose to travel as part of a family unit. Obstructions, poor quality footways and crossings, and inaccessible walking infrastructure may discourage family units from travelling actively and present safety concerns.	<p>Ensure changes are designed with family travel in mind, e.g. space and safety, ensure width for buggies or wheelchairs are considered</p> <p>Increase step-free access and avoid or reduce, as far as possible, any physical barriers as part of</p>

				<p>crossing improvements that would create accessibility issues for wheelchair users and people with mobility impairments</p> <p>Ensure lighting, signs and other infrastructure do not cause obstructions on the pavement.</p>
<p><b>Race/ethnicity<sup>18</sup></b> Including migrants, refugees and asylum seekers</p>	<p>54,343 residents (20%) were born outside of the UK</p> <p>72,272 residents (26%) are from a Black or Minority Ethnic group</p> <p>5.4% of households have no members with English as their main language.</p>	<p>We need to learn significantly more about the unique barriers to engagement and active travel that exist for Black and Racially Minoritised people, including intersectional lived experiences, and impact of other diverse identities.</p>	<p>Black and Minority Ethnic groups are more likely to be in roles where travel to work is unavoidable and where they are unable to change their working hours to travel at less busy times.</p> <p>People who do not speak / have who do not have English as their first language may struggle to access information about the transport changes that would help keep them safe.</p>	<p>Ensure interpreting services are available to support customers who do not have English as their first language.</p> <p>Share information about the transport changes with local groups for wider dissemination to different communities.</p> <p>Ensure Access Fund schemes that promote sustainable transport and support access to employment and education, are well publicised amongst Black and Racially Minoritised groups and communities.</p> <p>Provide information in relevant languages on request.</p>

				<p>Highlight the languages feature through Brighton &amp; Hove City Council's website which allows pages to be viewed in multiple languages.</p> <p>Assess and better understand safety and lived experiences around travel, access, barriers to engagement with active travel options, and road/usage for Black and Racially Minoritised and Multiple heritage people across age, faith, disabled, LGBTQIA+ and other intersections.</p>
<b>Religion or belief<sup>19</sup></b>	55% of residents have no religion or belief.	We need to learn significantly more about the unique barriers to engagement and active travel exist for people of faith with intersections with Black and Racially Minoritised identities, including intersectional lived experiences and impact of other diverse identities.	No specific disproportionate impacts of the scheme identified for this group at this time.	<i>No specific impacts of the scheme identified for this group. However, we do not clearly understand if there are any barriers to engagement, travel safety and usage experiences that differ for this group similar to the intersectional lived experiences of Black and Racially Minoritised groups. More engagement and consultation work to be identified and undertaken for this and Black and</i>

				<i>Racially Minoritised groups.</i>
<b>Sex/Gender<sup>20</sup></b>	<p>In 2021 there was estimated to be 141,000 female (51%) and 135,400 male (49%) and residents in the city.</p> <p><b>Source: ONS 2021 Mid-Year Population estimates</b></p> <p>In the city, 58% of carers are women rising to 62% of those providing care for 50 hours or more a week. Most caregivers, at home and in our communities, are also women.</p>	<p>Obstacles on cycling routes are more likely to impact women who may be travelling with children and larger, adapted bikes / cargo bikes.</p> <p>Women are more likely to cycle if they feel the route is safe (both physically and socially).</p> <p>Women are more likely to be travelling with children on 'the school run'.</p>	<p>Women are more likely to be travelling on the network with family members, as primary carers.</p> <p>Provision of protected cycling infrastructure, separated or away from motor traffic, is more likely to encourage women and families to cycle.</p>	<p>Consider the needs of key workers (e.g. care workers accessing clients' homes) when making changes to the transport network, (e.g. removing parking spaces).</p> <p>Ensure the design of cycling facilities is inclusive, (e.g. maximising the width of cycling infrastructure to ensure accessibility for all types of adapted cycles, installing dropped kerbs for easy access, and removing physical barriers/obstructions wherever possible).</p> <p>Ensure light separation on temporary cycle lanes to provide greater protection vehicle traffic for users.</p> <p>Identify and create opportunities to reallocate road space near schools to facilitate active travel and support physical distancing as</p>



				more children return to education.
<b>Sexual orientation<sup>21</sup></b>	<p>25,247 residents age 16+ (10.6%) identified as Gay or Lesbian, Bisexual or Other sexual orientation.</p> <p>The city is known for being a welcoming place for LGBTQ+ people and hosts large-scale annual events such as Pride</p>		Following discussions with the BHCC Events Team, works will take place after Brighton Pride in Preston Park so it does not impact events.	Continue to liaise with the Events Team on Pride and other events to identify and remove barriers and any disproportionate impacts.
<b>Marriage and civil partnership<sup>22</sup></b>	<p>Only a third of Brighton &amp; Hove residents (33%, 77,241 people) aged 16 or older are married or in a civil partnership.</p> <p><b>Source: ONS 2021 UK Population Census</b></p>	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.
<b>Community Cohesion<sup>23</sup></b>	The council has a responsibility to promote good relations between people of different protected characteristic groups under the Equalities Act	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.	Share information about changes and works being undertaken at the location(s) with local representative groups for wider dissemination.
<b>Other relevant groups<sup>24</sup></b>	No other relevant groups who may experience disproportionate impacts identified at this time.	No other relevant groups who may experience disproportionate impacts identified at this time.	No other relevant groups who may experience disproportionate impacts identified at this time.	No other relevant groups who may experience disproportionate impacts identified at this time.
<b>Cumulative impact<sup>25</sup></b>	<p>Around 3 people are killed and 158 seriously injured on the city's roads each year.</p> <p>More than half of the people killed or seriously injured on</p>	Safe walking, wheeling and cycling routes give people alternatives to increasingly unaffordable car ownership and the rising cost of public transport.		Work with representative groups in the city to understand the key transport and travel issues for all people.

	<p>the city's roads are pedestrians or pedal cyclists</p> <p>38.2% of households in the city don't own a car (or have one available). This increases to over 60% in more central areas of the city.</p>			
<b>Assessment of overall impacts and any further recommendations<sup>26</sup></b>				
<p>The city's transport network is used by everyone and therefore, any permanent or temporary changes to the network have the potential to impact on all groups of people with protected characteristics under the Equality Act.</p> <p>As the measures in the Action Plan are implemented the groups identified as most at risk of being disproportionately affected are disabled people, those from Black and Minority Ethnic groups and women. It is important that the changes:</p> <ul style="list-style-type: none"> <li>• Where possible meet physical accessibility standards in the latest guidance so as not to negatively impact disabled people but also provide accessible and inclusive improvements to support active travel. Where guidance cannot be fully complied with, mitigation measures must be taken to minimise potential impacts.</li> <li>• As a priority, retain disabled parking wherever possible and maintain disabled access. Where it is not possible to retain parking, mitigation measures such as new parking facilities close by will be incorporated into design.</li> <li>• Facilitate full accessibility for disabled people and where full accessibility is not practicably achievable ensure that sufficient mitigation measures are made so that accessibility can still be achieved safely and without disproportionately affecting disabled people.</li> <li>• Minimise obstructions and clutter on the highway, particularly where a road layout has been altered, taking opportunities to remove unnecessary signs / clutter to provide a better experience and clear routes for all people.</li> <li>• All communications are clear, accessible, and available in multiple formats to a wide audience. Including an offer to provide translated information, easy to read, braille and large text upon request.</li> </ul> <p>Continued engagement with organisations representing equality groups about the impacts of planned and implemented measures will be important for ensuring issues and concerns for specific communities are picked up and addressed.</p> <p>Engagement with Possibility People and Badge have highlighted the following concerns:</p> <ul style="list-style-type: none"> <li>- Hybrid floating bus stop access</li> <li>- Engagement and Accessibility</li> <li>- Blue Badge Bays and access to Preston Park and local amenities</li> <li>- Conflicts with other user</li> </ul>				

These concerns will be reviewed and further details around the placement of bus stops / shelters, signing and lining investigated.

This scheme will provide improvements with additional signalised crossings, better segregation of cyclists and pedestrians, and bus stop improvements. Work is ongoing to ensure that the scheme and particularly the floating bus stops and hybrid bus stops are as accessible and inclusive as is practicably possible. The project team has sought continuous engagement and feedback from community groups and the Active and Inclusive Travel forum and have and will continue to improve accessibility wherever possible within the design.

During the construction phase, we will be working with the contractor to ensure access is maintained. This will be a requirement of the works and further details will be provided in the phasing of the scheme and made available via communications and / or on the BHCC website. On site supervision will ensure this is monitored and access is reasonably maintained.

#### 4. List detailed data and/or community feedback that informed your EIA

<b>Title</b> (of data, research or engagement)	<b>Date</b>	<b>Gaps in data</b>	<b>Actions to fill these gaps: who else do you need to engage with?</b> (add these to the Action Plan below, with a timeframe)
Initial City-Wide Public Consultation	01/02/21 – 14/03/21	Data gathered from responses to publicly available consultation document – document not completed by all residents and as such not all views will be noted.	ETS committee approval was granted for the scheme to progress to construction in March 2022, this can be found via the following link: <a href="#">A23 Active Travel Scheme - Phase 1</a> .  Whilst no further formal consultation is planned, officers will use targeted communications to provide regular updates to residents and business and keep the webpage for the project up to date with accessible information.
BHCC Transport Staff Briefing	05/02/21 And February 2023		
Stakeholder Workshops	09/02/21 & 25/02/21 and February 2023		
Transport Partnership Workshop	02/03/21 and February 2023		
Bus Service Provider Consultation	04/03/21 and March 2023		

Further Engagement – Detailed Design Public Workshops	01/12/21 – 04/12/21		Residents and businesses will be notified of works 3 weeks before the start. A communications plan is being developed with the EEC Communications Officer.
Further Engagement – Active & Inclusive Travel Forum	08/12/21 and February 2023 via information pack.	Not all stakeholders in Forum attended meeting.	<p>Circulate meeting notes to all members of Forum requesting any further comments.</p> <p>Further engagement took place in February 2023 which included an information pack for everyone. Where requested, online or site visits have been undertaken with stakeholders. Good engagement from a range of groups.</p> <p>Feedback assessed and sent to designers to be assessed and incorporated where feasible to do so.</p>
Further Engagement – Bus Service Providers (Bus Boarder Arrangement Design Enquiry)	14/01/22		
Local Transport Plan / Local Walking and Cycling Infrastructure Plan	2022	Consultation undertaken	LCWIP adopted
BHCC Corporate Plan 2020-2023	2020	None identified	
UK Population Census	2011	None identified	

Customer contact via BHCC Transport Projects inbox		Largely reflects views of people who are against changes / wish to complain	
Joint Strategic Needs Assessment (JSNA) Executive Summary June 2022	2022	None identified	
Census 2021 <ul style="list-style-type: none"> <li>• Sexual orientation and gender identity: Census 2021 in England and Wales</li> <li>• Demography and migration: Census 2021 in England and Wales</li> <li>• Ethnic group, national identity, language, and religion: Census 2021 in England and Wales</li> </ul> Household language	2021	None identified	
Local Insight profile for 'Brighton and Hove' area	2023	OCSI work with public and community sector organisations to improve services. We turn complex datasets into engaging stories, making data, information and analysis accessible for communities and decision-makers. See <a href="http://www.ocsi.co.uk">www.ocsi.co.uk</a> for more information.	
Brighton and Hove Local Authority 2021 Census Area Profile – Nomis Official Census and Labour Market Statistics	2021	Nomis is a service provided by Office for National Statistics (ONS), the UK's largest independent producer of official statistics. On this website, we publish statistics related to population, society and the labour market at national, regional and local levels. These include data from current and previous censuses.	

## 5. Prioritised Action Plan<sup>27</sup>

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
Local residents may not have given their views on the project proposals – all groups possibly affected.	Further targeted consultation with residents that live/work within the vicinity of the proposed works.	Consultation responses from residents within the vicinity of the proposed works.	Responses to further consultation from local residents.	Completed December 2021
Further design work required on Bus Boarder arrangements following consultation feedback. Impact to disabled users and vulnerable road users.	Develop a hybrid bus boarder/floating bus stop design with input from Brighton and Hove Buses and guidance from DfT's Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.	Design option produced that account for a wider range of users in a more holistic way.	A design that provides accessibility for disabled people to access bus stops and use the bus service. The design will also undertake a Road Safety Assessment with any required actions to improve safety reasonably implemented.	By June 2023
All	Ensure detail of changes are published publicly with a distribution area/list reflecting the small-scale nature of the schemes	More people aware of what the council is doing and can plan their journeys accordingly	Fewer public enquiries about the changes	As and when information pack are mailed out and if/when TROs are advertised.  Highlight the languages feature through Brighton & Hove City Council's website which allows pages to be viewed in multiple languages.  Provide information in relevant languages, Easy

				Read, Braille, and Large Print versions on request.
All	Share information about changes with local community / representative groups to disseminate widely	Wider groups are aware of changes and can plan accordingly	Fewer negative impacts / complaints about the measures from specific groups	Pre implementation
Parents, Disabled People Age	Ensure measures that are in place for temporary works meet accessibility standards	Disabled users of the affected area and families are able to utilise the new measures safely and without obstruction	Fewer negative impacts / complaints about the measures from specific groups	Pre and during implementation
Black and Minority Ethnic groups – people whose first language is not English	Ensure information is shared about changes with local community / representative groups to disseminate widely	Greater awareness of the changes among minority groups	Fewer negative impacts / complaints about the measures from specific groups	Pre and during implementation
All	Ensure all works take into account people gathering near places of cafes/restaurants, community hubs and shops	People are still able to gather and that works don't obstruct this gathering	Reduced complaints about physical space from communities / residents wanting to gather	Pre and during implementation
All	Ensure detail of changes are published publicly with a distribution area/list reflecting the small-scale nature of the schemes	More people aware of what the council is doing and can plan their journeys accordingly	Fewer public enquiries about the changes	As and when information pack are mailed out and if/when TROs are advertised.  Highlight the languages feature through Brighton & Hove City Council's website which allows pages to be viewed in multiple languages.  Provide information in relevant languages, Easy



				Read, Braille, and Large Print versions on request.
Disabled people and groups	Review and address specific issues raised by Badge and Possibility People. Offer site meeting to discuss the project and any concerns. Review consultation materials and identify any lessons learnt for future engagement.	Improvements in the design of the scheme / hybrid bus stops	Fewer negative impacts / complaints about the measures from specific groups	By June 2023 for design items

**EIA sign-off:** (for the EIA to be final an email must be sent from the relevant people agreeing it or this section must be signed)

**Staff member completing Equality Impact Assessment:** Jazmine Hayes, Senior Project Manager

**Date:** 06<sup>th</sup> April 2023, re-submitted with additional considerations on 24<sup>th</sup> May 2023

**Directorate Management Team rep or Head of Service/Commissioning:** David Parker, Head of Transport Projects & Engineering

**Date:** 06<sup>th</sup> April 2023, re-submitted with additional considerations on 24<sup>th</sup> May 2023

**CCG or BHCC Equality lead:** Chris Brown, Equality, Diversity, and Inclusion Officer on 6<sup>th</sup> June 2023, and Sabah Holmes, Equality, Diversity, and Inclusion Manager Date: 14<sup>th</sup> June 2023

## Guidance end-notes

<sup>1</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

### <sup>2</sup> Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people in relation to their 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

**The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:**

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
  - Remove or minimise disadvantages suffered by people due to their protected characteristics
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
  - Tackle prejudice

- 
- Promote understanding

<sup>3</sup> EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

<sup>4</sup> **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

**Do you need to complete an EIA?** Consider:

- Is the policy, decision or service likely to be relevant to a specific group or groups (eg: older people)?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

<sup>5</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

<sup>6</sup> **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

<sup>7</sup> **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

<sup>8</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

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This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>9</sup> **Previous actions:** If there is no previous EIA or this assessment is of a new service, then simply write 'not applicable'.

<sup>10</sup> **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?<sup>10</sup>
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#> ) and national ones where they are relevant.

<sup>11</sup> **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
  - (a) consult when proposals are still at a formative stage;
  - (b) explain what is proposed and why, to allow intelligent consideration and response;
  - (c) allow enough time for consultation;
  - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered.

- 
- Identify any gaps in who has been consulted and identify ways to address this.

<sup>12</sup> Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
  - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
  - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  - If there is negative differential impact, how can you minimise that while taking into account your overall aims
  - Do the effects amount to unlawful discrimination? If so the plan must be modified.
  - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

<sup>13</sup> Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

<sup>14</sup> **Age:** People of all ages

<sup>15</sup> **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

<sup>16</sup> **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

<sup>17</sup> **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

<sup>18</sup> **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

<sup>19</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

<sup>20</sup> **Sex/Gender:** Both men and women are covered under the Act.

<sup>21</sup> **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

<sup>22</sup> **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

<sup>23</sup> **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

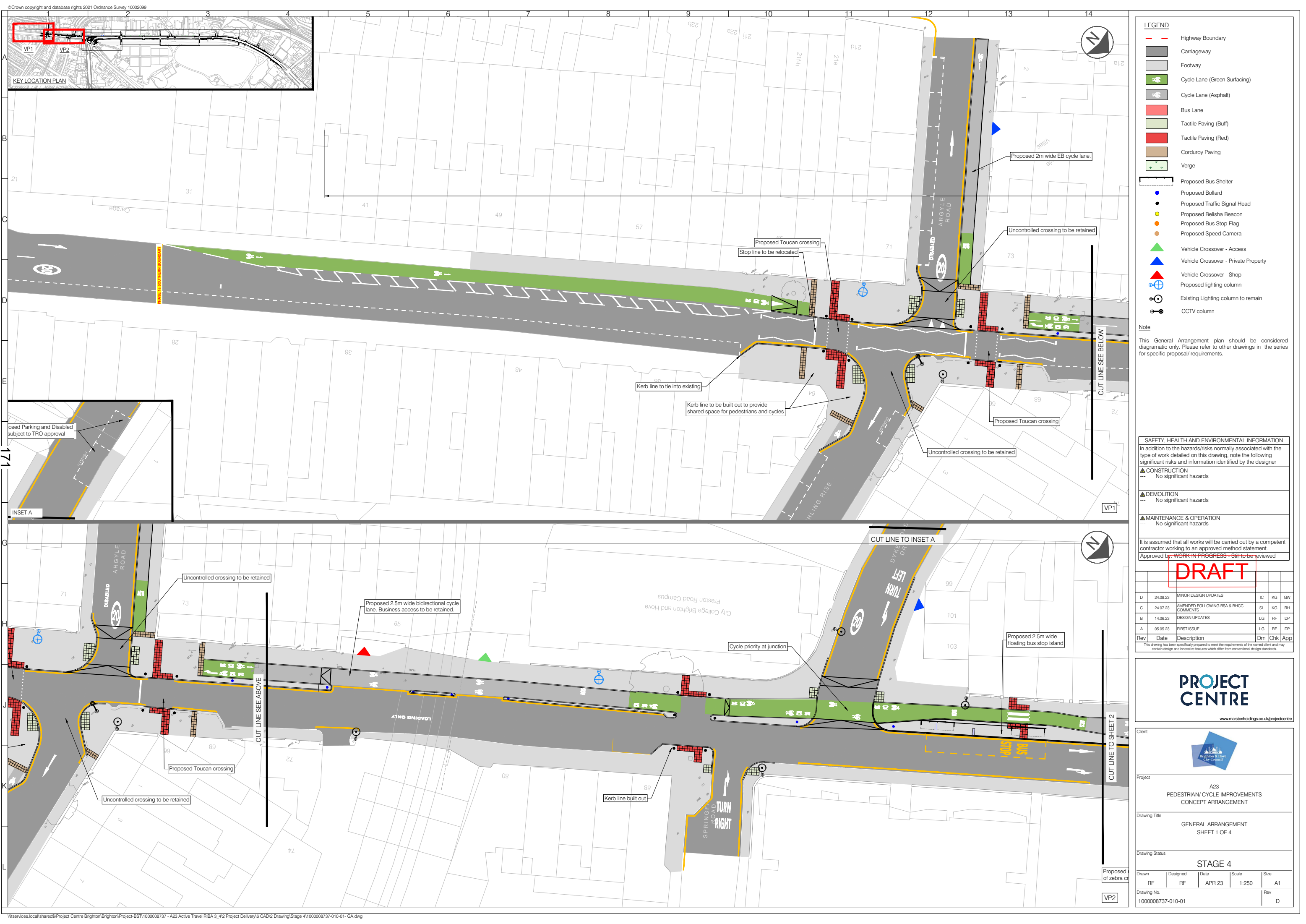
<sup>24</sup> **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

<sup>25</sup> **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

<sup>26</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

<sup>27</sup> **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.



**LEGEND**

- Highway Boundary
- Carriageway
- Footway
- Cycle Lane (Green Surfacing)
- Cycle Lane (Asphalt)
- Bus Lane
- Tactile Paving (Buff)
- Tactile Paving (Red)
- Corduroy Paving
- Verge
- Proposed Bus Shelter
- Proposed Bollard
- Proposed Traffic Signal Head
- Proposed Belisha Beacon
- Proposed Bus Stop Flag
- Proposed Speed Camera
- Vehicle Crossover - Access
- Vehicle Crossover - Private Property
- Vehicle Crossover - Shop
- Proposed lighting column
- Existing Lighting column to remain
- CCTV column

**Note**

This General Arrangement plan should be considered diagrammatic only. Please refer to other drawings in the series for specific proposal/ requirements.

**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION**

In addition to the hazards/risks normally associated with the type of work detailed on this drawing, note the following significant risks and information identified by the designer

**CONSTRUCTION**  
No significant hazards

**DEMOLITION**  
No significant hazards

**MAINTENANCE & OPERATION**  
No significant hazards

It is assumed that all works will be carried out by a competent contractor working to an approved method statement.  
Approved by: **WORK IN PROGRESS - Still to be reviewed**

DRAFT

D	24.08.23	MINOR DESIGN UPDATES	IC	KG	GW
C	24.07.23	AMENDED FOLLOWING RSA & BHCC COMMENTS	SL	KG	RH
B	14.06.23	DESIGN UPDATES	LG	RF	DP
A	05.05.23	FIRST ISSUE	LG	RF	DP
Rev	Date	Description	Drm	Chk	App

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Client

Project

A23  
PEDESTRIAN/ CYCLE IMPROVEMENTS  
CONCEPT ARRANGEMENT

Drawing Title

GENERAL ARRANGEMENT  
SHEET 1 OF 4

Drawing Status

STAGE 4

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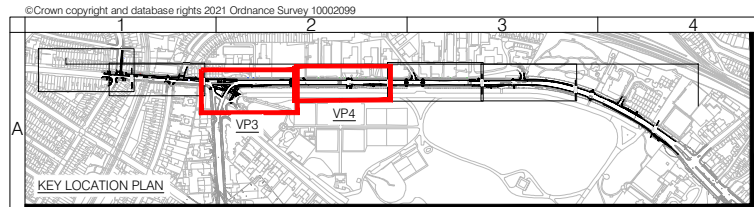
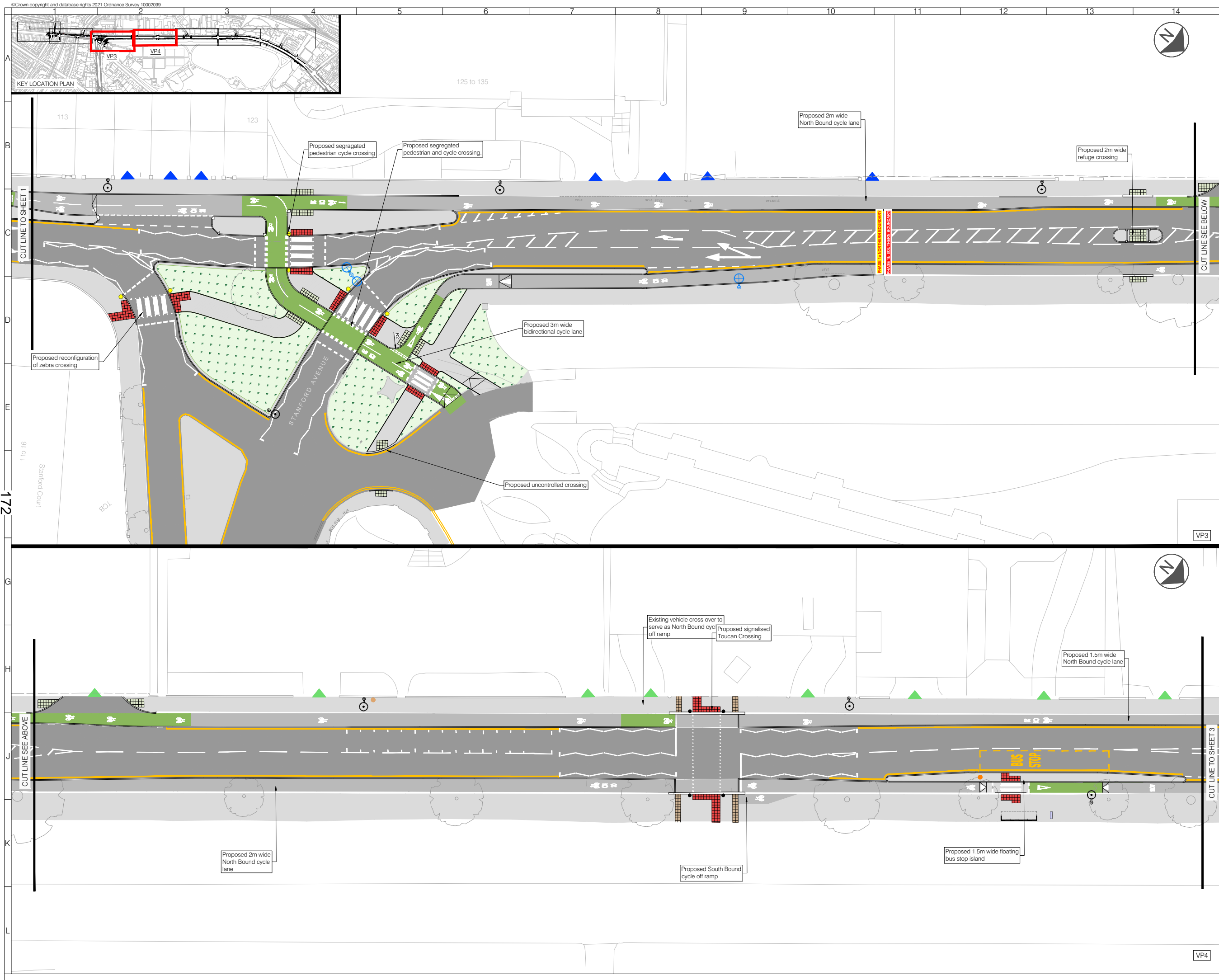
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- LEGEND**
- Highway Boundary
  - Carriageway
  - Footway
  - Cycle Lane (Green Surfacing)
  - Cycle Lane (Asphalt)
  - Bus Lane
  - Tactile Paving (Buff)
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--- No significant hazards				
▲ DEMOLITION				
--- No significant hazards				
▲ MAINTENANCE & OPERATION				
--- No significant hazards				
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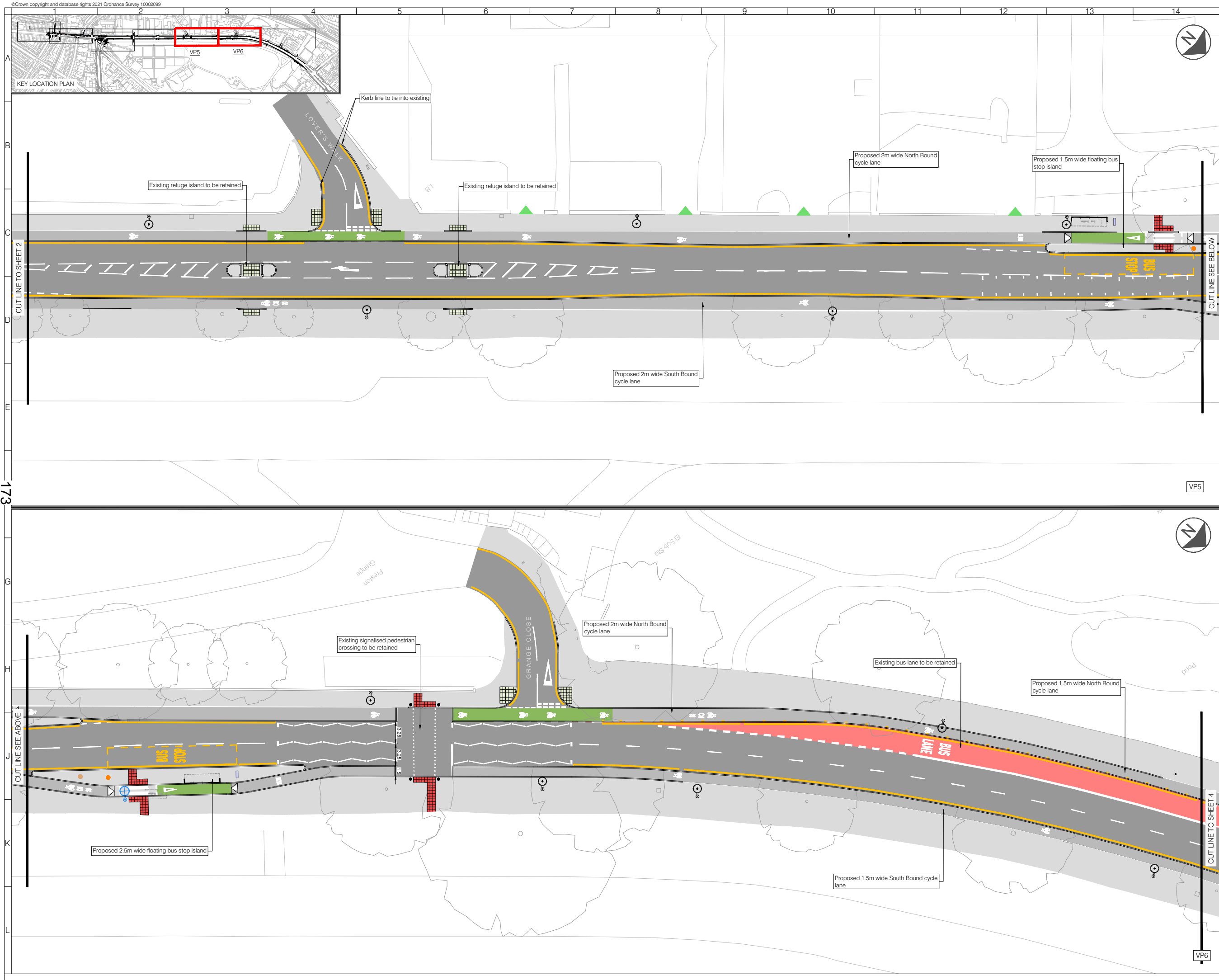
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Project		A23 PEDESTRIAN CYCLE IMPROVEMENTS CONCEPT ARRANGEMENT		
Drawing Title		GENERAL ARRANGEMENT SHEET 2 OF 4		
Drawing Status		STAGE 4		
Drawn	Designed	Date	Scale	Size
RF	RF	APR 23	1:250	A1
Drawing No. 1000008737-010-02				Rev D





**LEGEND**

- Highway Boundary
- Carriageway
- Footway
- Cycle Lane (Green Surfacing)
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SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	
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▲ DEMOLITION	
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▲ MAINTENANCE & OPERATION	No significant hazards
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It is assumed that all works will be carried out by a competent contractor working to an approved method statement.	
Approved by: <b>WORK IN PROGRESS - Still to be reviewed</b>	

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Rev	Date	Description	Drm	Chk	App
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Project

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CONCEPT ARRANGEMENT

Drawing Title

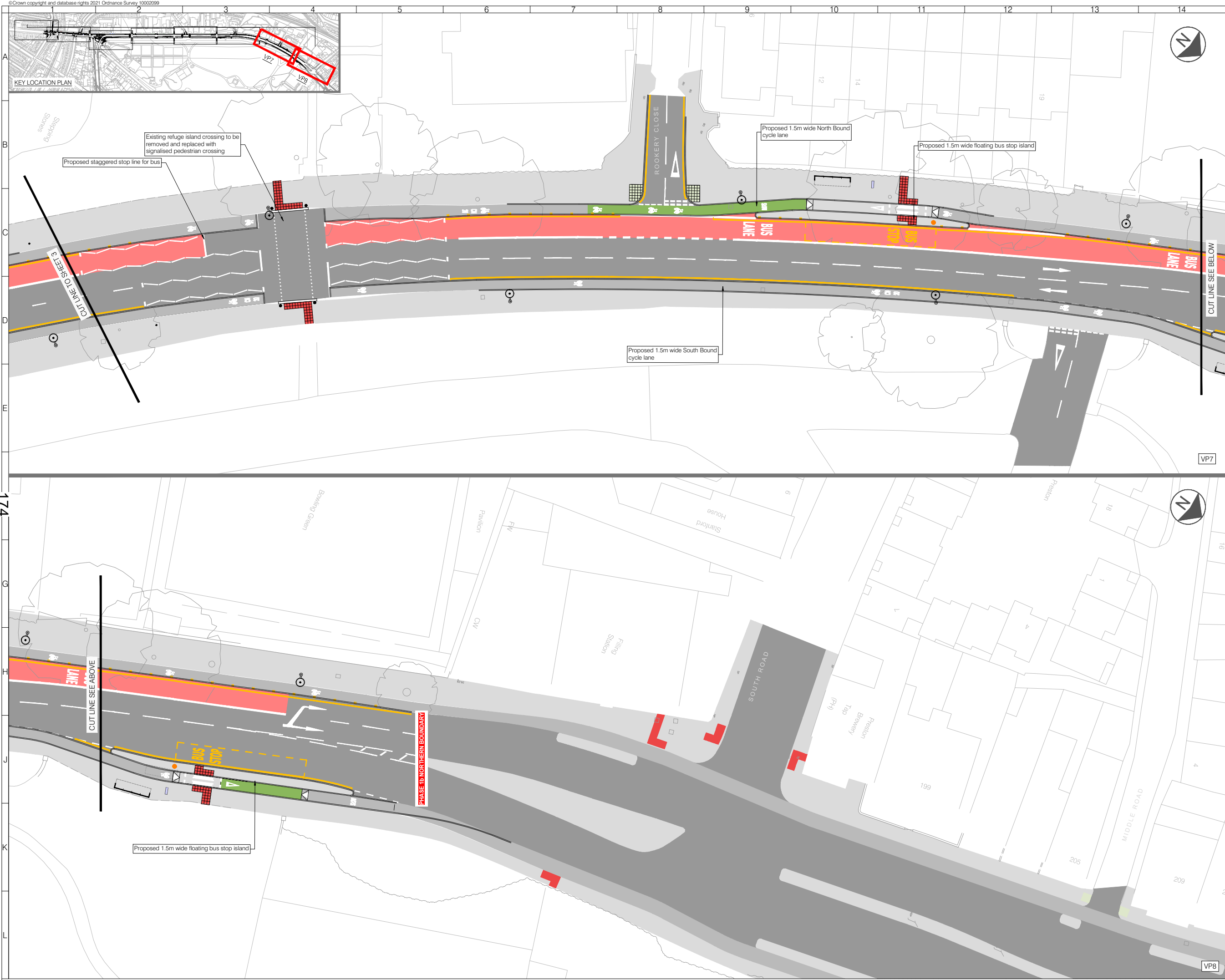
GENERAL ARRANGEMENT  
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Drawing Status

**STAGE 4**

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Drawing No.	Rev
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**LEGEND**

- Highway Boundary
- Carriageway
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**DEMOLITION**

--- No significant hazards

**MAINTENANCE & OPERATION**

--- No significant hazards

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Approved by: WDRK IN PROGRESS - Still to be reviewed

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Project

A23  
PEDESTRIAN/ CYCLE IMPROVEMENTS  
CONCEPT ARRANGEMENT

Drawing Title

GENERAL ARRANGEMENT  
SHEET 4 OF 4

Drawing Status

**STAGE 4**

Drawn	Designed	Date	Scale	Size
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Drawing No.

1000008737-010-04

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# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 30

**Subject:** Light Touch to Full Scheme Parking Programme

**Date of meeting:** 3 October 2023

**Report of:** Executive Director, Economy, Environment & Culture

**Contact Officer:** Name: Charles Field  
Tel: 01273 292929  
Email: [charles.field@brighton-hove.gov.uk](mailto:charles.field@brighton-hove.gov.uk)

**Ward(s) affected:** All Wards

**For general release**

### **1. Purpose of the report and policy context**

- 1.1 Following the Budget Council decision in February 2023 to convert all light touch resident parking schemes to full schemes, this report outlines the way forward.

### **2. Recommendations**

- 2.1 That Committee approves an initial high-level consultation in the West Hove area, Hove Park area, Hanover & Elm Grove area, Coombe Road area & Wish Road area light touch parking schemes. This high-level consultation would seek resident's views on converting to full schemes or remaining as a light touch parking scheme.
- 2.2 That Committee agrees that as part of this high-level consultation residents will be given options on keeping to a light touch parking scheme with a potential increased price for 2024/25 or changing to a full "outer" parking scheme with the current light touch prices frozen for 2024/25.
- 2.3 That Committee approves a new alternative permit pricing option for a full parking scheme permit in "outer" parts of the city as part of the above consultation. This replicates all the current costs of light touch parking schemes.

### **3. Context and background information**

- 3.1 The parking scheme consultations across the city were undertaken in accordance with the parking scheme priority timetable programme, which were agreed at this Committee following various petitions and deputations. The latest parking scheme priority timetable was agreed at the Environment, Transport & Sustainability Committee on 21 November 2021 and Appendix A shows the current agreed timetable.
- 3.2 The process involves an initial consultation, where the Council writes to all addresses within a proposed area. This lets the Council determine whether there is general support for a parking scheme and if so, what type

- 3.3 The options provided are either a full scheme, which is in place from 9am to 8pm Monday to Sunday, or a light touch scheme, which operates for two one-hour timeslots during the day, usually one hour in the morning and one hour in the afternoon or evening.
- 3.4 Officers present the initial consultation results to the Environment, Transport and Sustainability (ETS) Committee (Now Transport & Sustainability). This allows committee members to determine the next step based on officer recommendations.
- 3.5 If the committee's decision is to go ahead with the new controlled parking zone, the Council then consult the area on a detailed design for the scheme. This will show a plan of the approximate location of the different parking bay types and the days and times of operation.
- 3.6 The results of the detailed design consultation are presented to Committee. Based on the results and officer recommendations committee members determine whether the controlled parking zone should go ahead.
- 3.7 The final phase is the Traffic Regulation Order (TRO) stage, which is the legal document that makes parking restrictions enforceable. Residents can submit objections or comments in support of the TRO during the 21-day consultation period. Officers present these comments to the committee to determine final approval. If committee approves the way forward, officers begin the process of implementing the scheme. This includes a number of factors such as signing and lining infrastructure, permit applications and enforcement arrangements.
- 3.8 The current budget savings proposal to change light touch parking schemes to full schemes was approved at ETS Committee in January 2023 and then at Budget Council in February 2023, and prepared in accordance with the council's fees and charges policy which formed part of the budget strategy. By following the approved programme every year for 4 years it would create an additional saving of £300k per annum.
- 3.9 Light touch schemes do not utilise the entire available road space leaving a significant number of empty spaces during the day. Appendix A outlines the take-up of light touch scheme resident permits compared to capacity. The schemes also cause difficulties for enforcement as many of the enforcement periods are in the same hour which reduces flexibility and efficiency.
- 3.10 To alleviate any concerns regarding increased permit costs by converting light touch parking schemes to full schemes it is proposed that a new "outer" full parking scheme cost is introduced for resident permits to replicate the light touch parking scheme cost. This would only be introduced if any areas come forward wanting to convert to a full scheme. If residents want to keep to a light touch parking scheme then to take into account the lost utilisation of road space in the area there would need to be an increased price for light touch parking schemes considered for 2024/25.

- 3.11 The outcome of the high-level consultation will be reported back to the next Transport & Sustainability Committee in December to agree the way forward and inform the 2024/25 budget process.

#### **4. Analysis and consideration of alternative options**

- 4.1 It is recommended by officers to proceed with the recommendations. The other option is to do nothing but this is not recommended for the reasons outlined within the report. There is a requirement to bring forward schemes in accordance with previous committee approvals.

#### **5 Community engagement and consultation**

- 5.1 The intention is to consult the light touch schemes in the West Hove area, Hove Park area, Hanover & Elm Grove area, Coombe Road area & Wish Road area as soon as possible. This is an opportunity to see if residents, services & businesses in these areas would like to be considered for a full parking scheme or remain as a light touch parking scheme with potential price increases in 2024/25. The consultation results would be broken down by zone with the results being presented back to this Committee in December.
- 5.2 The light touch parking schemes in the Hallyburton Road area, the South Portslade area and the Surrenden Road area would not be consulted at this time. This is because public consultation has been taken place within the areas in the past 18 months and residents have already outlined recently that they would like a light touch parking scheme.

#### **6. Conclusion**

- 6.1 As set out in the body of the report and the recommendations.

#### **7. Financial implications**

- 7.1 The costs associated with the recommendations of this report will be contained within the current Parking Services budgets under additional parking income generated. The £0.3m Savings target has been applied to the budgets for converting light touch to full schemes, of which £0.45m will be achieved allowing for 0.15m of increased staffing costs to take this project forward. Any further enforcement costs if applicable are anticipated to be covered by increased enforcement income streams.
- 7.2 Use of surplus income from parking charges and penalty charges is governed by section 55 of the Road Traffic Regulation Act 1984. Once the direct costs of traffic management have been met, the use of surpluses is legally ringfenced to the provision of public transport services and to road, air quality and environmental improvements.
- 7.3 Parking charges are subject to the Council's Corporate Fees and Charges Policy. As a minimum, charges will be reviewed annually as part of the budget and service planning process.

Name of finance officer consulted: David Wilder      Date consulted: 22/09/23

## **8. Legal implications**

- 8.1 The Council regulates traffic by means of orders made under the Road Traffic Regulation Act 1984. The procedure for making such orders is contained in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 which require public notice of proposed orders to be given and for the relevant documents to be placed on deposit for public inspection. Any person may object to the making of an order. The Council's Constitution provides that decisions on TROs are made by Environment, Transport & Sustainability Committee where there are either six or more unresolved objections or the matter has been called in.

Name of lawyer consulted: Katie Kam      Date consulted: 26/06/23

## **9. Equalities implications**

- 9.1 Consultation took place and the comments and wishes of the respondents were taken into account when considering what changes would best meet the needs of those local population. Engagement with a wide range of residents has been built into the process from the start including an equality monitoring form. The use and analysis of data and engagement has informed the project to ensure it meets the needs of the local population. The proposed measures will be of benefit to many road users.

## **10. Sustainability implications**

- 10.1 Parking schemes can help to encourage less polluting travel options and reduce emissions. In addition, congestion can affect the reliability of journey times and long-term parking can reduce accessibility. Parking schemes can help to encourage alternative transport choices and higher turnover of spaces. Better accessibility through a high turnover of vehicles being parked helps to support local businesses.

## **Supporting Documentation**

### **Appendices**

Appendix A – Existing Priority Timetable

### **Background documents**

Agenda Item 66 – Report to ETS Committee 17 January 2023

Agenda Item 91 – Report to Council 23 February 2023

## Appendix A - Resident Permit take up by Light touch Zone (As of 1st September 2023)

Zone	Zone Name	Scheme	Permits Issued	Permits Allowed	% of valid permits per zone compared to space
L	West Hove	Light Touch - Monday to Sunday (11am to midday & 6pm to 7pm)	1225	2020	61%
P	Hove Park	Light Touch - Monday to Friday (9am to 10am & 1pm to 2pm)	396	2148	18%
S	Hanover & Elm Grove	Light Touch - Monday to Friday (11am to midday & 6pm to 7pm)	1308	2048	64%
U	Coombe Road Area	Light Touch - Monday to Friday (10am to 11am & 5pm to 6pm)	1122	1820	62%
W	Wish Road	Light Touch - Monday to Sunday (10am to 11am & 7pm to 8pm)	967	1475	66%
X	South Portslade	Light Touch - Monday to Friday (11am to midday & 6pm to 7pm)	289	424	68%
10	Surrenden Road	Light Touch - Monday to Friday (9am to 10am & 2pm to 3pm)	631	1227	51%
11	Hallyburton Road	Light Touch - Monday to Friday (11am to midday & 6pm to 7pm)	136	230	59%





# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 31

**Subject:** Parking Scheme Update

**Date of meeting:** 3<sup>rd</sup> October 2023

**Report of:** Executive Director, Economy, Environment & Culture

**Contact Officer:** Name: Tony Patchett

Email: [Anthony.Patchett@brighton-hove.gov.uk](mailto:Anthony.Patchett@brighton-hove.gov.uk)

Name: Charles Field

Email: [Charles.Field@brighton-hove.gov.uk](mailto:Charles.Field@brighton-hove.gov.uk)

**Ward(s) affected:** Westdene & Hove Park and Hollingdean & Fiveways

**For general release**

### 1. Purpose of the report and policy context

- 1.1 The purpose of this report is to update Committee on the progress of recent resident parking scheme consultations.
- 1.2 This report outlines the findings of the recent consultation with residents in the Withdean Road and Hollingdean Areas and requests Committee makes decisions on the associated TRO and parking schemes.

### 2. Recommendations

- 2.1 That Committee having taken account of all duly made representations and comments agree that the following Traffic Regulation Orders (TRO) are approved to enable the Withdean Road (Zone 12) to proceed to the implementation stage:

Brighton & Hove Various Controlled Parking Zones Consolidation Order 2018 Amendment Order No.\* 202\* (TRO-16a-2023)

Brighton & Hove Outer Areas (Waiting, Loading and Parking) and Cycle Lanes Consolidation Order 2018 Amendment Order No.\* 202\* (TRO-16b-2023)

- 2.2 That the Committee having taken account of all duly made representations and comments, agrees not to proceed with the Hollingdean parking scheme.

### **3. Context and background information**

- 3.1 The parking scheme consultations were undertaken in accordance with the parking scheme priority timetable programme, which was agreed at this Committee following various petitions and deputations.

### **4. Analysis and consideration of alternative options**

- 4.1 The main alternative options are doing nothing which would mean that the various parking scheme consultations/reviews would not be taken forward or consulting on a different option.
- 4.2 It is, however, recommended by officers to proceed with the recommendations for the reasons that are outlined within the report.

### **5. Community engagement and consultation**

#### **Withdean Road Area**

- 5.1 Following ETS approval in October 2019, A letter was sent out to 181 households in the Withdean Road area in June 2022. The results outlined that 88% of respondents were in favour of a Resident's Parking Scheme in the area based on a 57% response rate (104 respondents). 62.5% of respondents preferred a light touch scheme option. 65% of respondents preferred a Monday to Sunday scheme as opposed to 35% who wanted a Monday to Friday scheme.
- 5.2 Following ETS approval on 20 September 2022, it was agreed to write to residents and businesses in the Withdean Road area to find out if there was support for a Light Touch Residents Parking scheme Monday to Friday.
- 5.3 A Brighton & Hove City Council Land and Property Gazetteer was used to provide 181 property addresses in the Withdean Road area. A questionnaire and frequently asked question sheet were sent to each address. Respondents were invited to complete the questionnaire and return it using the pre-paid envelope provided. The consultation ran from 24 October to 27 November 2022. A summary of the results is shown in the table below.

Number of properties mailed	181
Consultation response rate	100 (55%)
Support for a residents parking scheme	89 (89%)
Against a parking scheme	11 (11%)
Preferred 9-10am and 1-2pm	75 (81%)
Requested different hours	18 (19%)

- 5.4 Following ETS approval on 17 January 2023 it was agreed to advertise a Traffic Regulation Order (TRO) to allow the implementation of the Withdean Road Area parking scheme. The TRO was advertised on 10 March 2023 with the closing dates for comments and objections on the 31 March 2023. The Ward Councillors for the area were consulted as were the statutory consultees such as the Emergency Services.

- 5.5 The notice was published in the Argus newspaper on the 10 March 2023. Detailed plans and the draft TRO were available to view online.
- 5.6 We received 98 items of correspondence to the proposals. This included support and objections. From residents who live within the proposed Zone there were 69 items of correspondence in support of the proposals due the parking problems, while there were 5 objections.
- 5.7 The comments/objections are listed in Appendix A alongside an outline of the officer comments.
- 5.8 Officers have attended meetings with Ward Councillors to discuss the results and the way forward.
- 5.9 Following agreement at Budget Council in February 2023, a proposal is being considered for all existing light-touch parking schemes to be consulted on becoming full touch parking schemes. The way forward is to be discussed at this Committee meeting. The parking consultation process was carried out within the Withdean Road area prior to the decision made at Budget Council.
- 5.10 After considering the way forward it was felt it was best to progress with this scheme ahead of the light to full scheme programme.
- 5.11 The scheme if approved will be reviewed after a year to see how it is working for residents, services & businesses and will include consulting residents, businesses and Services adjacent to both the Withdean parking scheme (including beyond the Tongdean Lane junction) and Zone P (Hove Park area) including the roads Woodland Drive, Nevill Avenue, Nevill Road and Goldstone Crescent. This can establish if there are any concerns on potential vehicle displacement.

### **Hollingdean Area**

- 5.12 Following ETS Committee approval on 8 October 2019, a letter was sent out to households in the Hollingdean Area in April 2022. The consultation was also advertised on the council's website, via social media and by a press-release to local media. The results outlined that 53% of respondents were in favour of a Resident's Parking Scheme in the area based on a 29% response rate. However, there was a concentration in a smaller area where 61.5% of residents wanted a scheme which was taken forward. Within this area 52% of respondents wanted a full scheme.
- 5.13 Following ETS approval on 20 September 2022 it was requested by the Ward Councillors to further consult with residents and businesses not included in the smaller boundary, to find out if there was support for a Full Residents Parking Scheme operating Monday to Sunday, 8am to 8pm. This was following concerns regarding potential additional parking pressure in the surrounding areas.

- 5.14 Brighton & Hove City Council Land and Property Gazetteer was used to provide 1279 property address in the Hollingdean area. A postcard was sent to each address. Respondents were invited to complete the survey online via the council's Consultation Portal, but paper copies were available to anyone should they need it. A total of 5 (3.6%) responses were received by mail and 135 (96.4%) responded online. The consultation ran from 28 October to 20 November 2022. A summary of the results is shown in the table below.

Number of properties mailed	1279
Consultation response rate	140 (11%)
Support for a residents parking scheme	73 (52%)
Against a parking scheme	67 (48%)

- 5.16 Analysis undertaken of all the responses received from respondents and the full results analysis of the consultation including road-by-road results and area plan is outlined in Appendix B. The results outlined that 52% of respondents were in favour of a Resident's Parking Scheme in the area based on a very low 11% response rate. Due to the low response rate the recommendation was to take forward the smaller Hollingdean Area.

- 5.17 Following this as with Committee approval a letter was sent out to households in the Hollingdean Area in April 2023. The results outlined that 40% of respondents were in favour of a Resident's Parking Scheme in the area based on a 34% response rate.

- 5.18 Brighton & Hove City Council Land and Property Gazetteer was used to provide 2223 property addresses in the Hollingdean area. Respondents were invited to view the detailed design plans and complete the survey online via the council's Consultation Portal. Paper copies were available upon request. The consultation ran from 21 April to 4 June 2023. A summary of the results is shown in the table below.

Number of properties mailed	2223
Consultation response rate	758 (34%)
Support for a residents parking scheme	305 (40%)
Against a parking scheme	452 (60%)

- 5.19 Analysis undertaken of all the responses received from respondents and the full results analysis of the consultation including road-by-road results and area plan is outlined in Appendix C.

- 5.20 A meeting has taken place with the Hollingdean and Stanmer Ward Councillors and the Transport Committee Chair, who are satisfied with the consultation process that has taken place.

- 5.21 However, there are concerns regarding an opposing campaign, which included misrepresented data which may have influenced the result. The Hollingdean and Stanmer Ward Councillors would also like the option to revisit the area again following the decision on the light to full scheme

timetable, which is due to be discussed at the October Transport & Sustainability Committee. This will be taken into account when the next parking scheme priority timetable is taken forward to this Committee next year.

## **6. Conclusion**

- 6.1 As set out in the body of the report and the recommendations.

## **7. Financial Implications**

- 7.1 The costs associated with the recommendations of this report will be contained within existing Parking Services budgets and/or funded from additional parking income generated. Use of surplus income from parking charges and penalty charges is governed by section 55 of the Road Traffic Regulation Act 1984. Once the direct costs of traffic management have been met, the use of surpluses is legally ringfenced to the provision of public transport services and to road, air quality and environmental improvements. Parking charges are subject to the Council's Corporate Fees and Charges Policy. As a minimum, charges will be reviewed annually as part of the budget and service planning process.

Name of finance officer consulted: David Wilder Date consulted:20/09/2023

## **8. Legal implications**

- 8.1 The Traffic Management Act 2004 places a duty on local traffic authorities to manage the road network with a view to securing, as far as reasonably practicable, the expeditious, convenient and safe movement of all types of traffic. The Council regulates traffic by means of traffic regulation orders (TROs) made under the Road Traffic Regulation Act 1984 which can prohibit, restrict or regulate the use of a road, or any part of the width of a road, by vehicular traffic. After the public notice of proposals for a TRO has been advertised, any person can object to the making of the TRO. Where there are unresolved objections to a TRO, then the matter must be returned to the Transport & Sustainability Committee for a decision. The Committee can decide to make the TRO unchanged, to make it with modifications that reduce the restrictions or not to proceed with it.

Name of lawyer consulted: Katie Kam Date consulted: 18/09/23

## **9. Equalities implications**

- 9.1 Consultation took place and the comments and wishes of the respondents were taken into account when considering what changes would best meet the needs of those local population. Engagement with a wide range of residents has been built into the process from the start including an equality monitoring form. The use and analysis of data and engagement has informed the project to ensure it meets the needs of the local population. The proposed measures will be of benefit to many road users.

## **10. Sustainability implications**

- 10.1 Parking schemes can help to encourage less polluting travel options and reduce emissions. In addition, congestion can affect the reliability of journey times and long-term parking can reduce accessibility. Parking schemes can help to encourage alternative transport choices and higher turnover of spaces. Better accessibility through a high turnover of vehicles being parked helps to support local businesses.

### **Supporting Documentation**

#### **Appendices**

Appendix A – Withdean TRO comments

Appendix B – Hollingdean Area Postcard report, results, and area plan

Appendix C – Hollingdean Area Detailed Design report, results, and area plan

#### **Background documents**

Agenda Item 32 – Report to ETS Committee 8 October 2019

Agenda Item 27 – Report to ETS Committee 20 September 2022

Agenda item 71 – Report to ETS Committee 17 January 2023

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Who	Road	Object/Support	Comment	Officers Comments
Resident	Withdean Road	Support	Benefit from proposed double yellow lines and dangerous parking and to stop long term parking	
Resident	Withdean Road	Support	will make the road safer	
Resident	Withdean Road	Support	dangerously abandoned vehicles parked long term, increased pedestrian safety	
Resident	Blackthorne Close	Support	congestion in the way vehicles are parked	
Resident	Withdean Road	Support	congested by the way vehicles are left	
Resident	Withdean Road	Support	stop long term and inconsiderate parking	
Resident	Withdean Road	Support	general support for CPZ, will make roads safer if	
Resident	Withdean Road	Support	hazardous parking, out of area abandoned parking, danger on bends, the rat run tunnel effect with speeding vehicles	
Resident	Withdean Road	Support	will make the area safer	
Resident	Blackthorne Close	Support	general support	
Resident	Withdean Road	Support	increase the safety of the road and enable better parking availability	
Resident	Withdean Road	Support	congested by the way vehicles are left	
Resident	Withdean Road	Support	less congestion and dangerous parking	
Resident	Withdean Road	Support	less congestion, dangerous parking or speeding in the area	
Resident	Withdean Road	Support	better visibility when accessing private parking spaces and less speeding	
Resident	Withdean Road	Support	will make the road safer	
Resident	Withdean Road	Support	better availability of parking for residents	
Resident	Withdean Road	Support	to stop long term and pavement parking and blocking of property entrances by vehicles and improving parking and availability for residents	
Resident	Withdean Road	Support	Too many commercial vehicles parked for days/weeks on end, rubbish collections missed due to obstructions, unsafe for pedestrians crossing due to unsafe parking	
Resident	Withdean Road	Support	Road safety	
Resident	Withdean Road	Support	allows better visibility on bends and less congestion	
Resident	Dyke Road Place	Support	stops commuter and long term parking	
Resident	Withdean Road	Support	will stop dangerous parking on bends	
Resident	Withdean Road	Support	more visibility when exiting driveway	
Resident	Withdean Road	Support	will stop abandoned vehicles and improve pedestrian safety	
Resident	Withdean Road	Support	general support for the proposal	
Resident	Castle Street	Support	will stop commuter parking and congestion	
Resident	Withdean Road	Support	eliminate long term dangerous parking and increase	
Resident	Ladies Mile Road	Support	will stop inconsiderate parking	
Resident	Ladies Mile Road	Support	dangerous parking	
Resident	Withdean Road	Support	support whole proposal increased road safety	
Resident	Blackthorne Close	Support	I support the current proposals	
Resident	Withdean Road	Support	commercial vehicles that are left on the street by people who are not residents, CPZ will increase access for spaces	
Resident	Withdean Road	Support	dangerous parking on bends	
Resident	Withdean Road	Support	dangerous parking on bends	
Resident	Wivelsfield Road	Support	To stop the terrible parking on blind corners	
Resident	Withdean Road	Support	elevate commuter parking	
Resident	Tongdean Road	Support	to stop long term parking	
Resident	Withdean Road	Support	increase in road safety and less dangerous parking	
Resident	De Courcel Road	Support	better access to off street parking	
Resident	Dyke Road Place	Support	to stop long term parking and abandoned vehicles from being left on the road	
Resident	Withdean Road	Support	These measures will make the area safer for all road users and pedestrians.	
Resident	Withdean Road	Support	increase in road safety and less dangerous parking on bends	
Resident	Withdean Road	Support	general support for the proposal	
Resident	New Church Road	Support	general support for the scheme to stop long term parking	
Resident	Withdean Road	Support	road safety	
Resident	Withdean Road	Support	safer travel for vehicles and pedestrians	
Resident	Withdean Road	Support	illegal and dangerous parking on the road	
Resident	Dyke Road Place	Support	increased congestion and better parking	
Resident	Withdean Road	Support	To stop the dangerous parking and increase safety for pedestrian	
Resident	Withdean Road	Support	dangerous parking on bends	
Resident	Midhurst Rise	Support	constant parked cars are causing congestion and dangerous driving conditions	
Resident	Isle of Man	Support	increased visibility when exiting driveway	
Resident	Withdean Road	Support	It will be safer for all road users and pedestrians	
Resident	Withdean Road	Support	better access for emergency vehicles	
Resident	Withdean Road	Support	dangerous parking	
Resident	Withdean Road	Support	Very busy and dangerous road and increased speed	
Resident	Withdean Road	Support	increased road safety	
Resident	Blackthorne Close	Support	support proposed parking restrictions	
Resident	Dyke Road Place	Support	to stop long term parking and abandoned vehicles from being left on the road	
Resident	Withdean Road	Support	to stop dangerous parking and vehicles being left for long periods	
Resident	Withdean Road	Support	dumped vehicles and congestion	
Resident	Guildford Road	Support	congestion and better visibility	
Resident	Guildford Road	Support	dangerous parking on blind bends and long term parking	

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Resident	Portland Street	Support	dangerously parked cars present a serious hazard to children and all road users	
Resident	Withdean Road	Support	improve traffic flow without incurring many restrictions	
Resident	Withdean Road	Support	increased road safety, to stop congestion and stop long term commercial parking	
Resident	Withdean Road	Support	increased road safety, to ease congestion and stop long term commercial parking	
Resident	Withdean Road	Support	parking on blind corners and pavement	
Resident	Withdean Road	Support	dangerous parking with all the bends and blind spots	
Resident	Withdean Road	Support	more visibility when exiting driveway	
Resident	Withdean Road	Support	general support for CPZ, will make roads safer if vehicles can no longer park on bends	
Resident	Withdean Road	Support	pavement parking, increased pedestrian safety	
Resident	Littlehampton	Support	better availability of parking for visitors to residents	
Resident	Littlehampton	Support	better visibility when accessing off street parking spaces	
Resident	Withdean Road	Support	pavement parking, increased pedestrian safety	
Resident	Withdean Road	Support	Dangerous cars parked on bends, more safety for	
Resident	Withdean Road	Support	Road safety	
Resident	Withdean Road	Support	cars parked on corners, creating bottlenecks and	
Resident	Withdean Road	Support	standstill traffic and congestion	
Resident	Bristol	Support	general support for the scheme	
Resident	Berkeley	Support	general support for the scheme to avoid hazards	
Resident	Withdean Road	Support	to stop Resident long term parking	
Resident	Withdean Road	Support	increased pedestrian safety	
Resident	Wayland Heights	Support	dumped vans, cars and motorhomes along the road	
Resident	Wayland Avenue	Objection	Object to whole scheme, a minority wanted the scheme	The parking scheme has already been through extensive consultation in regard to costs and times. The options and roads taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Wayland Avenue	Objection	permit bays too close to dropped kerbs	The parking scheme has already been through extensive consultation in regard to costs and times. Parking bays are proposed in this manner consistently across controlled parking zones. All legally dropped kerbs will not be obstructed by marked out parking bays.
Resident	Mill Rise	Objection	would like double yellow lines along entirety of Withdean Road, not permit parking	The parking consultation was requested due to concerns from residents about parking in their area.
Resident	Dyke Road Avenue	Objection	would like Mon - Sun operating hours	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Tivoli Crescent	Objection	supports Light Touch Scheme but would like different operating hours	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Tivoli Crescent	Objection	does not like parking bays opposite dropped kerbs	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Hillcrest	Objection	does not like proposed scheme as this is a money making exercise, would not stop number of cars on the public highway	Parking schemes need to be self-financing, so that any costs i.e signs, lines, enforcement are all covered by the permit costs. The parking scheme has been through extensive consultation in regard to costs and times.
Resident	Gables Avenue	Objection	This will just push the problem of dumped vehicles into the surrounding streets which do not have restrictions.	The parking consultation was requested due to concerns from residents about parking in their area. The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Brangwyn Way	Objection	It is not necessary	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Bramble Rise	Objection	against whole proposal, long term parking is not an issue	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Wayland Avenue	Objection	against whole proposal, no issues around available parking places in the road	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Wayland Avenue	Objection	would like different with enforcement times, does not support scheme as a whole as there are no issues parking the vehicle	The parking scheme has already been through extensive consultation in regard to costs and times. The options taken forward is that which is preferred by the majority of respondents in the whole area to previous consultations.
Resident	Millcroft	Objection	would like to retain free parking for Residents	The parking consultation was requested due to concerns from residents about parking in their area.
Resident	Withdean Close	Objection	does not support scheme, would like only double yellow lines	The parking consultation was requested due to concerns from residents about parking in their area.



## **Appendix B**

### **Hollingdean Area Residents Parking Scheme Follow up postcard question November 2022**

#### **Background**

In April 2022 we wrote to residents in the Hollingdean area to ask if they would like to be considered for a residents' parking scheme in the area. The results from this consultation showed that 52.6% of respondents were in favour of a scheme.

It was agreed that the Council would progress to a detailed design in a smaller area where most support was shown. It was also requested by Ward Councillors that we would write to residents on roads outside this area to make them aware that if this scheme is agreed there may be a negative impact on their roads and to give them a further opportunity to be included in the detailed design.

#### **Headline Findings**

##### **Support to be included in the area that will be consulted for a residents' parking scheme:**

- 52.1% of respondents would like to be consulted for a residents' parking scheme in the area
- 47.9% of respondents do not want to be consulted for residents' parking scheme in the area

#### **Methodology**

Brighton & Hove City Council Land and Property Gazetteer was used to provide 1279 property addresses outside of the proposed scheme boundary for the forthcoming Hollingdean Area consultation. A postcard was sent to residents and businesses in these periphery roads to make them aware of the proposed forthcoming scheme and to offer a further chance to decide to opt in and be consulted further when a scheme is designed for the Hollingdean area.

Respondents were invited to complete the survey online via the council's Consultation Portal or given the option to request a paper copy of the questionnaire should they wish to. 135 (96.4%) responses were received online and 5 (3.6%) paper copies were returned. The consultation ran from 28 October to 20 November 2022.

#### **Results**

140 valid responses<sup>1</sup> were received from within the proposed scheme boundary giving a response rate of 10.9%.

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<sup>1</sup> 25 Cases were removed: 4 with an incomplete address, 3 from outside the area and 18 duplicate responses

**Q. Would you like to be included in the area that will be consulted for a residents' parking scheme? (response base 140<sup>2</sup>)**

Yes		No	
Number	%	Number	%
73	52.1	67	47.9

**Results on a street-by-street basis were as follows:**

Street	Number properties mailed	Number responses	Response rate %	Yes		No	
				Number	%	Number	%
Barrow Close	8	1	12.5	1	100	0	0
Barrow Hill	9	0	0.0	0	0	0	0
Beal Crescent	25	3	12.0	2	66.6	1	33.3
Brentwood Close	10	4	40.0	2	50.0	2	50.0
Brentwood Crescent	44	7	15.9	6	85.7	1	14.3
Brentwood Road	120	19	15.8	11	57.9	8	42.1
Burstead Close	189	14	7.4	6	42.9	8	57.1
Crespin Way	52	9	17.3	7	77.8	2	22.2
Florence Place	1	0	0.0	0	0	0	0
Fountains Close	7	0	0.0	0	0	0	0
Golf Drive	57	3	5.3	0	0	3	100
Hinton Close	5	1	20.0	0	0	1	100
Isfield Road	23	5	21.7	0	0	5	100
Lambourne Close	10	3	30.0	1	33.3	2	66.7
Lambourne Road	23	5	21.7	1	20.0	4	80.0
Liphook Close	8	0	0.0	0	0	0	0
Lynchet Close	83	2	2.4	2	100	0	0
Lynchet Down	9	0	0.0	0	0	0	0
Lynchet Walk	15	2	13.3	1	50.0	1	50.0
Melrose Close	11	0	0.0	0	0	0	0

<sup>2</sup> Response base = number of people answering this question

Merevale	48	1	2.1	1	100	0	0
Mountfields	36	8	22.2	4	50.0	4	50.0
Peace Close	2	1	50.0	1	100	0	0
Romsey Close	14	1	7.1	0	0	1	100
Salehurst Close	6	0	0.0	0	0	0	0
Shenfield Way	17	7	41.2	3	42.9	4	57.1
Stephens Road	103	12	11.7	7	58.3	5	41.7
Tavistock Down	63	3	4.8	1	33.3	2	66.7
The Crestway	109	3	2.8	2	66.7	1	33.3
Thompson Road	71	7	9.9	5	71.4	2	28.6
Uplands Road	60	8	13.3	3	37.5	5	62.5
Wolverstone Drive	41	11	26.8	6	54.5	5	45.5
<b>TOTAL</b>	<b>1279</b>	140	10.9	<b>73</b>	<b>52.1</b>	<b>67</b>	<b>47.9</b>



## Demographic Information

Age	Number	%
18-24	5	4.5
25-34	6	5.4
35-44	18	16.2
45-54	28	25.2
55-64	20	18.0
65-74	19	17.1
75+	15	13.5
<b>Total</b>	<b>111</b>	<b>100</b>

Gender	Number	%
Male	59	42.1
Female	64	52.0
Non-Binary	0	0
Other	0	0
<b>Total</b>	<b>123</b>	<b>100</b>

Do you identify as the gender you were assigned at birth?	Number	%
Yes	120	100
No	0	0
<b>Total</b>	<b>120</b>	<b>100</b>

Disability	Number	%
Yes, a little	15	12.1
Yes, a lot	21	16.9
No	88	71.0
<b>Total</b>	<b>124</b>	<b>100.0</b>

Of those who answered “yes”, disabilities were as follows:

Please state the type of impairment which applies to you.	Number
Physical impairment	16
Sensory impairment	4
Learning disability/ difficulty	2
Long-standing illness	16
Mental health condition	7
Development condition	1
Autistic Spectrum	2
Other	4

Ethnic Origin		Number	%
White	White English/ Welsh/ Scottish/ Northern Irish/ British	102	85.7
	Irish	0	0
	Gypsy or Irish Traveller	1	0.8
	Any other white background	7	5.9
Asian or Asian British	Bangladeshi	0	0
	Indian	1	0.8
	Pakistani	0	0
	Chinese	1	0.8
	Any other Asian background	1	0.8
Black or Black British	African	1	0.8
	Caribbean	0	0
	Any other Black background	0	0
Mixed	Asian & White	1	0.8
	Black African & White	1	0.8
	Black Caribbean & White	0	0
	Any other mixed background	1	0.8
Any other ethnic group	Arab	0	0
	Any other ethnic group	2	1.7
<b>Total</b>		<b>119</b>	<b>100</b>

Sexual Orientation	Number	%
Bisexual	7	6.7
Gay Man	1	1.0
Heterosexual/ straight	93	88.6
Lesbian/ Gay Woman	1	1.0
Other	3	2.9
<b>Total</b>	<b>105</b>	<b>100</b>

Religious Belief	Number	%
I have no particular religion or belief	61	55.0
Buddhist	1	0.9
Christian	40	36.0
Hindu	0	0
Jain	0	0
Jewish	0	0
Muslim	2	1.8
Pagan	0	0
Sikh	0	0
Agnostic	0	0
Atheist	4	3.6
Other	2	1.8
Other philosophical belief	1	0.9
<b>Total</b>	<b>111</b>	<b>100</b>

<b>Are you a carer</b>	<b>Number</b>	<b>%</b>
Yes	25	19.8
No	101	80.2
<b>Total</b>	<b>126</b>	<b>100</b>

<b>If yes, do you care for a:</b>	<b>Number</b>
Parent	12
Partner or Spouse	9
Child with special needs	1
Friend	0
Other family member	4
Other	1

<b>Armed Forces</b>	<b>Yes</b>		<b>No</b>	
	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Are you currently serving in the UK armed forces?	0	0	118	100
Have you ever served in the UK armed forces?	5	4.2	113	95.8
Are you a member of a current or former serviceman or woman's immediate family/ household?	3	2.6	114	97.4





## **Appendix C**

### **Hollingdean Area Residents Parking Scheme Detailed Design Consultation Report**

#### **Background**

In April 2022, residents in the Hollingdean area were written to in order to gauge whether there was support for a residents parking scheme.

The results from this initial consultation showed that 53% of respondents supported the introduction of a residents parking scheme. However, the majority of support was concentrated from within a smaller area, so a revised consultation boundary for the detailed design was proposed following discussions with Officers and Ward Councillors.

The results of the revised smaller area from the initial consultation showed that 61% of respondents supported the introduction of a residents parking scheme, with 52% preferring a full scheme.

Both sets of results from the initial consultation were presented to the Environment, Transport and Sustainability Committee on 20 September 2022, where it was agreed to take forward a detailed design consultation within the smaller area.

Ward Councillors requested that Officers write to residents outside of the proposed scheme, the wider Hollingdean area, to highlight the potential implications of not being included within the residents parking scheme, and ensure they did not wish to be included.

In October 2022 we sent a postcard to residents outside of the proposed scheme, in the wider Hollingdean area. The response rate was very low at only 11%, therefore they were not included in the detailed design consultation. The results of the postcard consultation were presented to the Environment, Transport and Sustainability Committee on 17 January 2023, where it was agreed to proceed to a detailed design for the smaller area only.

#### **Headline Findings**

The consultation received a response rate of 34.1%.

##### **Support for a resident parking scheme:**

- 40.3% of respondents support the implementation of a residents parking scheme.
- 59.7% of respondents do not support the implementation of a residents' parking scheme.

## Methodology

Brighton & Hove City Council Land and Property Gazetteer was used to provide 2223 property addresses in the proposed Hollingdean Area scheme boundary. An information leaflet and detailed map were sent to each address. People were asked to go online to complete a questionnaire. People could also request a paper copy of the questionnaire with a prepaid envelope for reply. The consultation was advertised on the council's website, via social media and by a press-release to local media. The consultation ran from 21 April to 4 June 2023.

## Results

758 valid responses<sup>1</sup> were received from within the proposed scheme boundary giving a response rate of 34.1%.

### Q1 Would you like a parking scheme in your area?

(response base 757<sup>2</sup>)

Yes		No		Total
Number	%	Number	%	
305	40.3	452	59.7	757

### Results on a street-by- street basis were as follows:

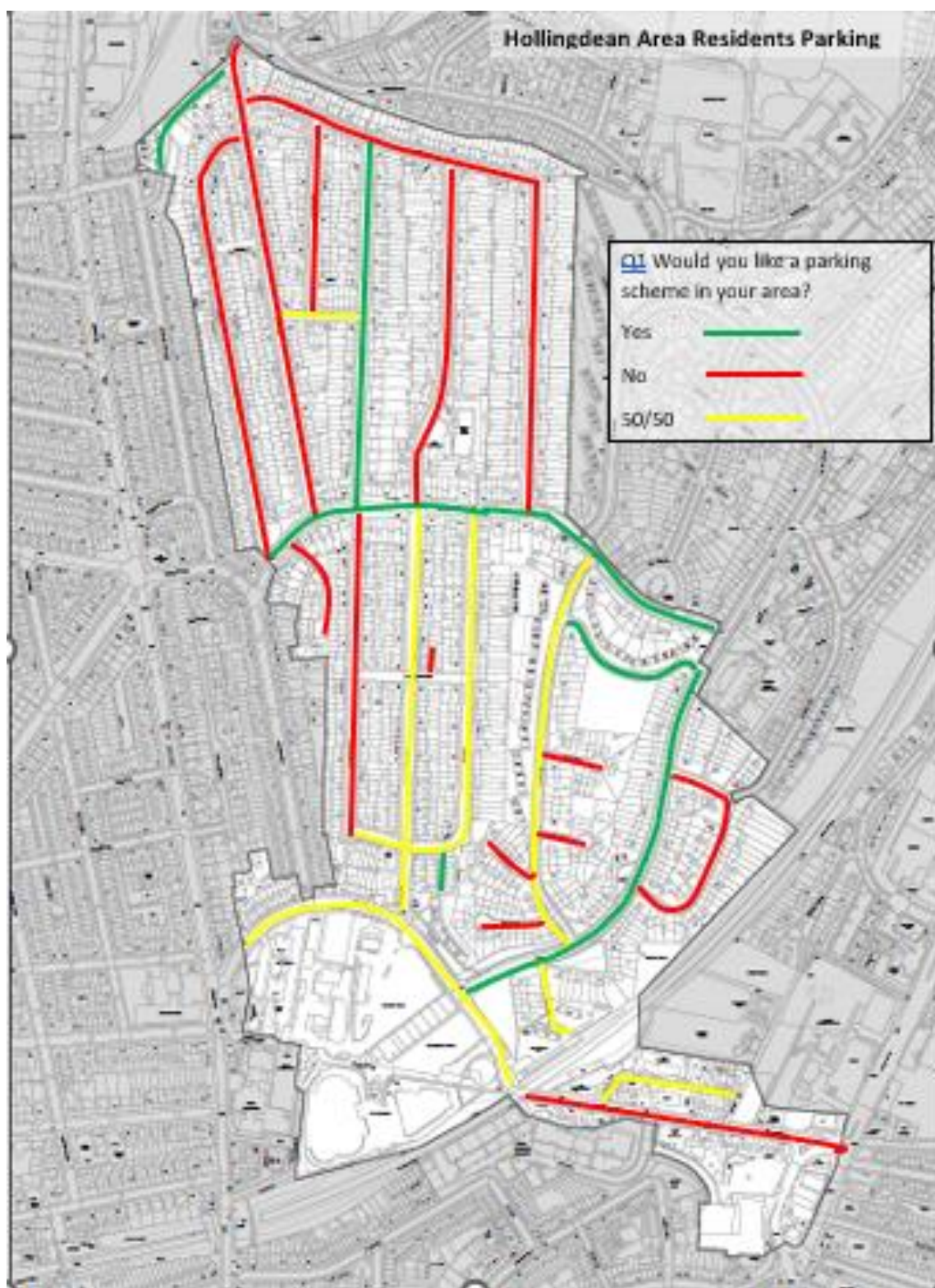
(response base 757)

Street	Number properties mailed	Number responses	Response rate %	Yes		No	
				Number	%	Number	%
Adams Close	13	3	23.1	0	0.0	3	100
Barnett Road	109	73	67.0	13	17.8	60	82.2
Davey Drive	94	33	35.1	18	54.5	15	45.5
Dudley Road	91	46	50.5	23	50.0	23	50.0
Dunster Close	14	4	28.6	0	0.0	4	100
Freehold Terrace	78	4	5.1	2	50.0	2	50.0
Harrington Place	38	22	57.9	6	27.3	16	72.7
Hertford Road	88	54	61.4	21	38.9	33	61.1
Hollingbury Crescent	21	18	85.7	11	61.1	7	38.9

<sup>1</sup> 325 responses were removed from the analysis for the following reasons: 187 were duplicate cases, 74 were from outside the area, 32 no street given and 32 with an incomplete address.

<sup>2</sup> Response base = number of people answering this question (some respondents didn't answer all questions)

Street	Number properties mailed	Number responses	Response rate %	Yes		No	
				Number	%	Number	%
Hollingbury Place	53	21	39.6	11	52.4	10	47.6
Hollingbury Rise	75	47	62.7	12	26.1	34	72.9
Hollingbury Rise West	4	3	75.0	3	100	0	0.0
Hollingbury Road	2	1	50.0	0	0	1	100
Hollingdean Lane	3	0	0.0	0	0	0	0
Hollingdean Road	315	11	3.5	4	36.4	7	63.6
Hollingdean Terrace	257	117	45.5	51	43.6	66	56.4
Horton Road	117	28	23.9	14	50.0	14	50.0
Major Close	7	5	71.4	1	20.0	4	80.0
Payne Terrace	8	0	0.0	0	0.0	0	0.0
Quarry Bank Road	12	6	50.0	3	50.0	3	50.0
Roedale Road	143	62	43.4	37	59.7	25	40.3
Southmount	12	3	25.0	3	100	0	0.0
Stanmer Park Road	161	73	45.3	27	37.0	46	63.0
Stanmer Villas	130	66	50.8	22	33.3	44	66.7
The Crossway	12	5	41.7	3	60.0	2	40.0
The Linkway	37	7	18.9	5	71.4	2	28.6
Tintern Close	11	3	27.3	0	0.0	3	100
Upper Hollingdean Road	248	20	8.1	10	50.0	10	50.0
Waverley Crescent	52	15	28.8	3	20.0	12	80.0
Wigmore Close	18	8	44.4	2	25.0	6	75.0
<b>Total</b>	<b>2223</b>	<b>758</b>	<b>34.1</b>	<b>305</b>	<b>40.3</b>	<b>452</b>	<b>59.7</b>



**Q3 Respondents were asked whether they are a resident, a business owner or manager or work in the area. (Respondents could tick more than one option).**

	Number of responses
Resident	737
Business owner or manager	37
Work in the area	34
Other	10

**Q4 How many cars in your household?**

No. of cars	Number of responses
0	45
1	476
2	190
3	28
4 or more	3

**Q5a What type of business do you own or manage in the area?**

What type of business?	Number of responses
Retail outlet	5
Office-based	11
Other	39
<b>Total responses</b>	<b>55</b>

**Q5b How many vehicles are directly associated with your business?**

No. of vehicles	Number of responses
0	235
1	39
2	4
3	2
4 or more	3

## Q7 Any further comments?

An open text box enabled respondents to add comments. These comments were grouped together and themed as follows:<sup>3</sup> The top ten types of comments are listed in the following table:

Comments made	Number of times mentioned
Residents' Permits are expensive / for high emission vehicles / Money making exercise / unhappy about paying more / don't want to pay for parking / reduce costs for those on benefits / don't increase prices / allow discounts for low paid	194
Scheme not needed / we've already rejected a scheme/ don't support a scheme / council ignoring residents wishes, needs	176
Want light-touch scheme / why have you not offered this / hours too long	89
Need Scheme / ASAP / support scheme	56
Visitor permits: expensive/ should be free / free for BHs / difficult for visitors, family carers to park	47
Won't solve after 8pm parking	37
Parking spaces will be lost / Wigmore Close / Roedale Court/ Waverly Crescent / Dunster Close/ over driveways/ Major Close	28
Will be difficult for businesses / employees / shops / users of community centre/ City Gate / want free parking outside shops / for loading / Hollingdean Terrace/ Hollingbury Place	26
Will stop long term / all day parking / abandoned vehicles / dangerous parking / non-residents	23
Will cause displacement parking	19

## Demographic Information

Age	Number	%
18-24	18	3.0
25-34	52	8.6
35-44	139	23.1
45-54	177	29.4
55-64	140	23.2
65-74	54	9.03
75+	23	3.8
<b>Total</b>	<b>603</b>	<b>100</b>

Gender	Number	%
Male	285	43.3
Female	368	55.9
Non-Binary	5	0.8
<b>Total</b>	<b>658</b>	<b>100</b>

Do you identify as the gender you were assigned at birth?	Number	%
Yes	628	98.1
No	12	1.9
<b>Total</b>	<b>639</b>	<b>100</b>

Disability	Number	%
Yes, a little	76	11.9
Yes, a lot	45	7.1
No	516	81.0
<b>Total</b>	<b>637</b>	<b>100</b>

Of those who answered “yes”, disabilities were as follows:

Please state the type of impairment which applies to you.	Number
Physical impairment	59
Sensory impairment	8
Learning disability/ difficulty	10
Long-standing illness	42
Mental health condition	27
Development condition	3
Autistic Spectrum	12
Other	23

Ethnic Origin		Number	%
White	White English/ Welsh/ Scottish/ Northern Irish/ British	525	83.2
	Irish	10	1.6
	Gypsy or Irish Traveller	1	0.2
	Any other white background	44	7.0
Asian or Asian British	Bangladeshi	1	0.2
	Indian	5	0.8
	Pakistani	1	0.2
	Chinese	5	0.8
	Any other Asian background	5	0.8
Black or Black British	African	2	0.3
	Caribbean	5	0.8
	Any other Black background	2	0.3
Mixed	Asian & White	7	1.1
	Black African & White	3	0.5
	Black Caribbean & White	1	0.2
	Any other mixed background	7	1.1
Any other ethnic group	Arab	1	0.2
	Any other ethnic group	6	1.0
<b>Total</b>		<b>631</b>	<b>100</b>

Sexual Orientation	Number	%
Bisexual	20	3.6
Gay Man	7	1.3
Heterosexual/ straight	487	88.9
Lesbian/ Gay Woman	18	3.3
Other	16	2.9
<b>Total</b>	<b>548</b>	<b>100</b>

Religious Belief	Number	%
I have no particular religion or belief	349	59.6
Buddhist	8	1.4
Christian	127	21.7
Hindu	2	0.3
Jain	0	0
Jewish	5	0.9
Muslim	3	0.5
Pagan	3	0.5
Sikh	1	0.2
Agnostic	12	2.0
Atheist	52	8.9
Other	14	2.4
Other philosophical belief	10	1.7
<b>Total</b>	<b>586</b>	<b>100</b>



<b>Are you a carer</b>	<b>Number</b>	<b>%</b>
Yes	105	16.0
No	553	84.0
<b>Total</b>	<b>658</b>	<b>100</b>

<b>If yes, do you care for a:</b>	<b>Number</b>
Parent	60
Partner or Spouse	11
Child with special needs	27
Friend	2
Other family member	12
Other	11

<b>Armed Forces</b>	<b>Yes</b>		<b>No</b>	
	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Are you currently serving in the UK armed forces?	2	0.2	612	99.7
Have you ever served in the UK armed forces?	5	0.9	573	99.1
Are you a member of a current or former serviceman or woman's immediate family/ household?	6	1.0	581	99.0



# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 32

**Subject:** Parking Fees & Charges 2023/24 – Traffic Regulation Orders

**Date of meeting:** 3<sup>rd</sup> October 2023

**Report of:** Executive Director of Economy, Environment & Culture

**Contact Officer:** Name: Charles Field  
Email: Charles.field@brighton-hove.gov.uk

**Ward(s) affected:** Brunswick & Adelaide, Central Hove, Hollingdean & Fiveways, Kemp Town, Moulsecoomb & Bevendean, Queens Park, Regency, Round Hill, West Hill & North Laine, Whitehawk & Marina.

### For general release

#### 1. Purpose of the report and policy context

- 1.1 This report outlines the responses to Traffic Regulation Orders (TRO's) related to parking fees & charges.
- 1.2 The first is the proposal to remove the resident annual visitor permit for the Event Day areas near the AMEX Stadium.
- 1.3 The second is for the change from High Tariff to Low Tariff for all on-street parking charges within Zone C (Queens Park), Zone H (RSCH area) and Zone J (London Road Station area). In Zone N (Central Hove) the majority of the zone will be Low Tariff with the exception of Kingsway which will be Medium Tariff.

#### 2. Recommendations

- 2.1 That Committee approves the advertised TRO-30-2023 Event Day - Brighton & Hove (Coldean & Moulsecoomb) (Event Days) Parking Order 2013 Amendment Order No\* 202\*. This removes the event day guest permit from the Fees & Charges schedule.
- 2.2 That Committee approves the advertised TRO-33-2023 Tariff - Brighton & Hove Various Controlled Parking Zones Consolidation Order 2018 Amendment Order No.\* 202\*. This changes the High Tariff to Low Tariff for all on-street parking charges within Zone C (Queens Park), Zone H (RSCH area) and Zone J (London Road Station area). In Zone N (Central Hove) the majority of the zone will be Low Tariff with the exception of Kingsway which will be Medium Tariff.

### **3. Context and background information**

#### **TRO-30-2023 Event Day Permit**

- 3.1 The TRO (Traffic Regulation Order) was advertised on 14 July 2023 with the closing dates for comments and objections on the 4 August 2023. The Ward Councillors for the area were consulted as were the statutory consultees such as the Emergency Services.
- 3.2 The notice was published in the Argus newspaper on the 14 July 2023. The draft TRO was also available to view online.
- 3.3 The guest permit is an annual permit (transferable to any vehicle) that residents previously obtained free of charge which allows residents visitors to park on event days (Coldean & Mouslecoomb schemes only). It was also agreed at Environment, Transport & Sustainability (ETS) Committee in June 2020 that this permit would be charged at £50 rather than free but this wasn't implemented due to IT issues at the time as well as prioritization of the digital modernisation programme. This programme has been lengthy focusing on 38,000 resident permits (now all migrated to the new system) before taking forward all the other types of permits.
- 3.4 This £50 charge was in response to the 2019 consultation in the area. In particular there were concerns from some residents that some guest permits were being sold or passed on to non-residents to use on event and matchdays. It was outlined that the charge of £50 for this annual guest permit represents great value for a potential 20+ event or matchdays for those that wish to have guests on these days. There is also the ability to purchase daily visitor permits (up to 50 per year) for more infrequent visits on any particular day (£3.80 per day).
- 3.5 This guest permit was previously automatically issued to residents and after reviewing the IT system and to ensure consistency across zones (as well as more recent issues below) it was felt that removing the guest permit would be the best approach rather than introducing the £50 charge which was previously agreed at Committee three years ago. This removal was included in the budget savings proposals which were agreed in February 2023 at Budget Council.
- 3.6 More recently there have been issues about the illegal use of visitor permits as well as potentially guest transferable permits.
- 3.7 As well as annual guest permits residents receive free resident permits and as outlined in 3.4 can pay for visitor permits which were all introduced when the Amex Stadium was developed. This is the only location in Brighton & Hove where guest permits are in existence.
- 3.8 There have been a number of problems and complaints from residents concerning enforcement during event days for the Amex Stadium in Coldean & Moulsecoomb. Civil Enforcement Officers do enforce illegal parking in the area but it appears valid visitor permits for the event day parking scheme

which can only be issued to local residents are being displayed by visiting football supporters.

- 3.9 We do limit the visitor permit allocation to residents (which have to be paid for) to up to 50 per year and may have to review this allocation further if the complaints continue although the removal of the free guest permit for residents as part of budget savings for 23/24 may resolve some of the issues. As there would be no guest permit then the visitor permits would then be used more for their actual purpose for visitors to residents during event days.

### **TRO-33-2023 Tariff Change order**

- 3.10 The TRO was advertised on 21 July 2023 with the closing dates for comments and objections on the 11 August 2023. The Ward Councillors for the area were consulted as were the statutory consultees such as the Emergency Services.
- 3.11 The notice was published in the Argus newspaper on the 21 July 2023. The draft TRO was also available to view online.
- 3.12 The proposals to change Zones C (Queens Park), H (RSCH area) and J (London Road Station area) and Zone N (Central Hove) from low / medium tariff areas to high tariff areas were included in the overall budget package approved at Budget Council in February 2023 reflecting both sustainable transport policy and financial objectives.
- 3.13 Implementation of this new Traffic Regulation Order for the four parking zones will potentially result in income shortfalls of £0.400m as tariffs would be set lower than the original agreed budget of High Tariffs. The implications of this were discussed at Strategy, Finance and Regeneration Committee on 13<sup>th</sup> July 2023.

## **4. Analysis and consideration of alternative options**

- 4.1 There are a number of alternative options that were considered. These included going ahead with further reductions to on-street paid parking or keeping them at the proposed levels agreed by Budget Council for 2023/24.
- 4.2 For reasons outlined in the report, it is proposed to take forward these changes to the fees & charges in 2023/24. Any other options would either have a further impact on the income generated for 2023/24 or would impact service users.

## **5. Community engagement and consultation**

- 5.1 Following the decisions made at Budget Council in February 2023 and changes made at Strategy, Finance and Regeneration Committee on 13<sup>th</sup> July 2023 Traffic Regulation orders (TRO's) were advertised.

The following correspondence was received;

### **TRO-30-2023 Event Day Permit**

There was ten 10 objectors / comments and one support – The main reasons were the following:

- Need a visitor permit so family, carers, friends can visit (there are visitor permits)
- Should not have to pay for people to visit their homes.
- People did not want the stadium.
- No enforcement so people attending matches park anyway.
- Parking on match days block roads
- Suggestions included making permits for a particular property and a charge for yearly permit.

### **TRO-33-2023 Tariff Change order**

5.2 There was six objectors / comments to this fees & charges proposal. The main reasons were the following:

- Income received from parking used to support concessionary travel and should be used further to support public transport.
- Income from parking used to support walking and cycling infrastructure and should be used further to support walking and cycling.
- Encourage people away from private motoring – Climate emergency and reduce congestion.
- Council short of money and parking is a good way to raise income.

## **6. Conclusion**

6.1 As set out in the body of the report and the recommendations.

## **7. Financial implications**

7.1 There are no direct financial implications arising from recommendation 2.1 of this report. Removal of the event day guest permit was agreed at Policy & Resources Committee in February 2023 within the Fees and Charges 2023-24 Report. Costs associated with advertising Traffic Regulation Orders (TROs) for the removal of the event day guest permit have been met from existing revenue budgets.

7.2 Strategy, Finance & City Regeneration Committee agreed in July 2023 for the 4 parking zones to remain as low tariff as part of the Parking Fees & Charges 2023/24 report to committee. Both this report and the Parking Fees & Charges 2023/24 report to Strategy, Finance & City Regeneration Committee in July 2023 include the financial impact of income shortfalls of £0.400m as tariffs would be set lower than the original agreed budget of High Tariffs.

7.3 Targeted Budget Management (TBM) month 2 also reported at Strategy, Finance & City Regeneration Committee in July 2023 highlighted at the time

a forecasted overspend for Parking Services of £0.830m prior to the change for tariffs to maintain at low tariffs. The £0.400m impact of maintaining low tariff has potentially increased this figure to £1.230m, though further analysis of the impact will be conducted as part of the councils' monthly budget monitoring process and any significant variation to budget reported. Costs associated with advertising Traffic Regulation Orders (TROs) for changes to charges have been met from existing revenue budgets.

- 7.4 In the case of on-street parking permits, tariffs and penalty charges, the use of any surplus income from civil parking enforcement, after taking into account costs, is governed by section 55 of the Road Traffic Regulation Act 1984 as amended. This requires the defined Parking Surplus to be used for transport and highways related projects and expenditure such as supported bus services, concessionary fares, Local Transport Plan projects and environmental improvements. Where the council also funds transport and highways related budgets from its General Fund budget, increases to the Parking Surplus can be lawfully applied to this expenditure, which can thereby release equivalent General Fund resources. The council may use the released resources for any purpose within its duties and powers, including releasing resources for savings.

Name of finance officer consulted: John Lack    Date consulted: 12/09/2023

## **8. Legal implications**

- 8.1 The Traffic Management Act 2004 places a duty on local traffic authorities to manage the road network with a view to securing, as far as reasonably practicable, the expeditious, convenient and safe movement of all types of traffic.
- 8.2 The Council regulates traffic by means of traffic regulation orders (TROs) made under the Road Traffic Regulation Act 1984 which can prohibit, restrict or regulate the use of a road, or any part of the width of a road, by vehicular traffic.
- 8.3 After the public notice of proposals for a TRO has been advertised any person can object to the making of the TRO. Where there are unresolved objections to a TRO, then the matter must be returned to the Transport & Sustainability Committee for a decision. The Committee can decide to make the TRO unchanged, to make it with modifications that reduce the restrictions or not to proceed with it.

Name of lawyer consulted: Katie Kam    Date consulted: 13/09/2023

## **9. Equalities implications**

- 9.1 There are no Equalities implications identified as part of these proposals.

## **10. Sustainability implications**

- 10.1 There are no sustainability implications identified as part of these proposals.

## **Supporting Documentation**

### **1. Background documents**

1. Environment, Transport & Sustainability (ETS) Committee - June 2020
2. Strategy, Finance and Regeneration Committee - 13<sup>th</sup> July 2023



# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 33

**Subject:** School Streets – Westdene Primary and Hove Junior School ETROs

**Date of meeting:** 3 October 2023

**Report of:** Executive Director, Economy, Environment & Culture

**Contact Officer:** Name: Jazmine Hayes  
Email: [jazmine.hayes@brighton-hove.gov.uk](mailto:jazmine.hayes@brighton-hove.gov.uk)

**Ward(s) affected:** Westdene and Hove Park, Wish and Westbourne & Poets' Corner

### For general release

#### 1. Purpose of the report and policy context

- 1.1 This report outlines the consultation results for the Experimental Traffic Regulation Orders (ETROs) at Westdene Primary School (TRO-30a-2022) and Hove Junior School (TRO-35-2022), which were respectively implemented as part of the council's School Streets programme. Details of the advertised orders can be seen in Appendix 3.
- 1.2 The School Streets programme supports the safe movement of children to and from school. Motor vehicles are restricted during school drop off and pick up times, which reduces congestion, improves road safety and air quality, and creates streets that encourage more walking, cycling, wheeling, and scooting. This programme contributes to delivering the council's carbon reduction targets and is aligned with national strategies such as the Department for Transport's 'Gear Change' vision released in July 2020, setting out the national ambition to make walking and cycling the natural choice for short journeys, or as part of a longer journey. Locally, it aligns with the Local Transport Plan 5 (LTP5) which is being developed to help everyone move around the city more safely, sustainably, and easily. School Streets support the vision, outcomes and principles of the new LTP5, as agreed by the Environment, Transport and Sustainability (ETS) Committee on 22 June 2021.
- 1.3 This report considers comments and objections received through the initial obligatory six-month ETRO statutory consultation period at both sites and provides recommendations for next steps.

#### 2. Recommendations

- 2.1 That the Committee, having taken account of all duly made comments and representations, agrees that the provisions of TRO-30a-2022 (Westdene Primary School) is to be made permanent, with the minor amendment to authorise unrestricted access for Brighton and Hove City Council vehicles.

- 2.2 That the Committee, having taken account of all duly made comments and representations, agrees that the provisions of TRO-35-2022 (Hove Junior School) is to be made permanent with the minor amendment to authorise unrestricted access for Brighton and Hove City Council vehicles.

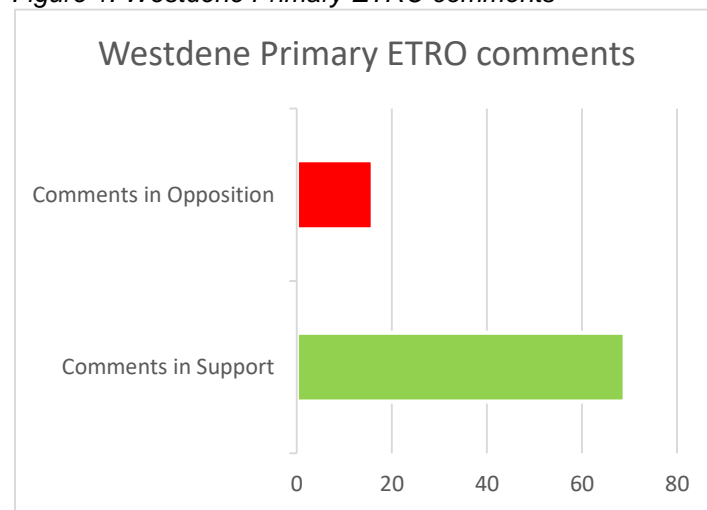
### **3. Context and background information**

- 3.1 School Streets trials were first introduced in the city in March 2019 with a subsequent expansion of trials in June 2020. In October 2021 ETS committee made the School Streets programme permanent, with a commitment to the provision of a rolling School Streets programme which implements sustainable, ongoing closures outside as many of the city's schools as possible, subject to highway feasibility.
- 3.3 In the 2021/2022 programme year, six school sites were prioritised for implementation: Downs Infant School (Florence Place), Downs Junior School (Grantham Road, Edburton Avenue), Hove Junior School (School Road, Marmion Road), St. Marys Catholic Primary School (Vale Gardens), Queens Park Primary School (Freshfield Place) and Westdene Primary School (Barn Rise).

#### Westdene Primary School (Barn Rise)

- 3.4 Westdene Primary School was shortlisted for the 2021/2022 programme for a School Streets closure and infrastructure improvements.
- 3.5 Following consultation in Autumn 2021, the design was finalised and implemented under ETROs (TRO-30a-2022) on 22 November 2022. The effect of the order is as follows:
- Prohibition of Motor Vehicles Monday to Friday 8.15am to 9.15am and 2.45pm to 3.45pm - Term Time Only except for access in Barn Rise (from the western junction with Dene Vale to its junction with Bankside) to encourage active and sustainable travel.
  - One-Way (except pedal cycles) in Bankside (From the junction with Mill Rise to junction with Barn Rise) and Barn Rise (From the junction with Mill Rise/Dene Vale to the southern boundary of No.14 Barn Rise)
  - Road Closure of Slip Road on Barn Rise leading to Bankside
  - Introduce double yellow lines in Bankside and Barn Rise
  - A flat top road hump on Bankside
  - Amends the descriptions for new no waiting at any time (double yellow lines) in Dene Vale/Mill Rise (no changes will be made on ground)
- 3.6 The initial six-month public ETRO comment period closed on 22 May 2023, and the scheme currently remains in full-time operation pending a committee decision. TRO-30a-2022 received 85 responses in total. Support for the scheme was overwhelming with 81% (69) of comments being supportive and 19% (16) of respondents objecting to the scheme. A summary of ETRO comments can be seen at Appendix 1.

Figure 1. Westdene Primary ETRO comments



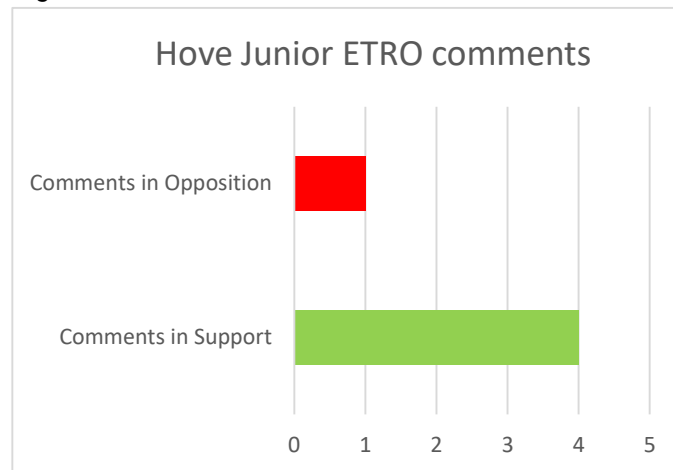
- 3.7 The key theme of objector comments was opposition to one-way network changes being operational all the time and not just during School Streets restricted hours. The second key theme was perceived non-compliance with the one-way network change. Whilst it would not be safe to implement a timed one-way restriction, officers have reviewed accident data and no accidents have been reported. It is therefore not appropriate to address these comments in a scheme re-design.
- 3.8 In March 2022 pre-implementation monitoring took place at the site and post-implementation monitoring and evaluation will take place, once the scheme has been operational for one full year. In lieu of post-implementation monitoring data, accident data has been reviewed and no accidents have been reported in the scheme boundaries.

#### Hove Junior School (School Road, Marmion Road)

- 3.9 The School Streets scheme at Hove Junior School was shortlisted for the 2021/2022 programme for a School Streets closure and infrastructure improvements.
- 3.10 Following consultation in Autumn 2021, the design was finalised and the scheme was implemented on an ETRO (TRO-35-2022) on 03 January 2023. The effect of the order is as follows:
- Prohibition of Motor Vehicles Monday to Friday 8.15am to 9.15am and 2.45pm to 3.45pm -Term Time Only except for access in Marmion Road (From the junction with School Road to its junction with Mainstone Road) and School Road (from Portland Road to of the junction with Milnthorpe Road) to encourage active and sustainable travel.
  - The existing widened footpath will be extended both along and into the carriageway. It will remove some of shared permit and paid parking bays on the west side of School Road will be replaced with double yellow lines.

- A flat top road hump on School Road and Marmion Road respectively
- 3.11 The initial six-month public ETRO comment period closed on 03 July 2023, and the scheme currently remains in full-time operation pending a committee decision. TRO-35-2022 received 5 responses in total. 4 of the responses were supportive and 1 respondent objected to the scheme. A summary of ETRO comments can be seen at Appendix 1.

Figure 2. Hove Junior ETRO comments



- 3.12 The single objection stated that enforcement at the time of launch was not effective. In response to this, officers undertook site visits and liaised closely with the school; it was agreed that the initial signage only approach was not effective at this site and school staff therefore agreed to implement a physical closure and operate barriers, this change was implemented on Monday 10 July 2023. Support for this change has been received due the positive impact it has had on enforcement. If the TRO is made permanent at this site, the gated closure will continue.
- 3.13 In March 2022 pre-implementation monitoring took place at the site and post-implementation monitoring and evaluation will take place later this year, once the scheme has been operational for one full year. In lieu of post-implementation monitoring data, accident data has been reviewed and no accidents have been reported in the scheme boundaries.

#### 4. Analysis and consideration of alternative options

- 4.1 In 2021 an amendment to the Traffic Management Act 2004 granted Local Authorities in England the ability to apply to central government for greater enforcement powers, including the use of automatic number plate recognition (ANPR) cameras, which could positively impact the delivery of the School Streets programme in future years. ANPR cameras are widely used in London boroughs to enforce School Streets closures. In future, Brighton & Hove may apply for these powers for use at School Streets sites.
- 4.2 To not proceed with making the respective schemes permanent would require construction works to return the highway and public realm to the original arrangement, for which there would be a financial implication. Moreover, this would contravene the wishes of local residents, parents and carers, school

children and businesses who expressed their support throughout numerous consultation and engagement exercises.

## **5. Community engagement and consultation**

- 5.1 In Autumn 2021, a six-week formal city-wide consultation was conducted for each respective 2021/2022 site. Collectively, the results of the consultations saw that 78.8% of respondents support the principle of School Streets as a way to support safer travel to school. Furthermore, collectively 74.1% of respondents supported the proposals at the 2021/2022 sites.

### Westdene Primary School (Barn Rise)

- 5.2 A six-week city-wide public consultation took place in Autumn 2021 and the survey received 260 responses. 75.1% of respondents expressed support for the principle of School Streets as a way to support safer travel to school. 70.2% of respondents expressed support for the proposal at Westdene Primary School Street.
- 5.3 TRO-30a-2022 were advertised and open for comment for a minimum of six months as detailed in Section 3 of the report.

### Hove Junior School (School Road, Marmion Road)

- 5.4 A six-week city-wide public consultation took place in Autumn 2021 and the survey received 166 responses. 85.4% of respondents expressed support for the principle of School Streets as a way to support safer travel to school. 80.2% of respondents expressed support for the proposal at Hove Junior School.
- 5.5 TRO-35-2022 was advertised and open for comment for a minimum of six months as detailed in Section 3 of the report.

## **6. Conclusion**

- 8.1 The respective ETROs for Westdene Primary School and Hove Junior School were advertised following due process and representations considered. Officers recommend that the provisions of both the Westdene Primary (TRO-30-2022 & TRO-30a-2022) and Hove Junior School (TRO-35-2022) ETROs are made permanent as set out in the recommendations in Section 2.

## **7. Financial implications**

- 7.1 The costs associated with the recommendations of this report for the ETRO to be made permanent will be contained within existing budgets. Should a decision be made to not make the ETROs permanent, additional construction works would be required to return the highway and public realm to the original arrangement for which capital funding would need to be identified or reallocated from existing resources reducing available funds for earmarked schemes. Any significant variations to budget will be reported as part of the council's monthly budget monitoring process.

Name of finance officer consulted: John Lack

Date consulted: 19/09/2023

## **8. Legal implications**

- 8.1 The Council, as traffic authority, is empowered to make Experimental Traffic Regulation Orders (ETROs) under the provisions of s9 of the Road Traffic Regulation Act 1984. An ETRO cannot remain in force for longer than 18 months. Public notice must be given that the ETRO has been made, that the traffic authority will be considering in due course whether the provisions of the ETRO will continue in force indefinitely, and that any objections to the making of such a permanent order must be made within six months of the making of the ETRO or any order amending the same (Sched. 5 Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996). The traffic authority must give consideration to any duly made objection.

Name of lawyer consulted: Katie Kam

Date consulted: 11/09/23

## **9. Equalities implications**

- 9.1 The Equality Act 2010 requires public sector authorities to comply with the Public Sector Equality Duty in carrying out their functions. This includes making reasonable adjustments to the existing built environment to ensure the design of infrastructure is accessible to all.
- 9.2 The permanent programme was initially operating under an Equality Impact Assessment developed during the COVID-19 emergency programme. The Equality Impact Assessment for the programme was reviewed and updated April 2023, this is now approved and attached at Appendix 2.

## **10. Sustainability implications**

- 10.1 The measures will improve the transport network for sustainable modes of transport by reallocating road space, predominantly at school drop off and pick up times when timed restrictions will be enforced.

## **Supporting Documentation**

### **1. Appendices**

1. ETRO comments
2. School Streets Equality Impact Assessment
3. TRO-30a-2022 and TRO-35-2022

### **2. Background documents**

1. School Streets ETS committee report 21 September 2021

**Westdene Primary School (TRO-30-2022 and TRO-30a-2022)**

**Total Comments** 85  
**Comments in Support** 69  
**Comments in Opposition** 16

<b>Objection comment themes</b>	<b>Count</b>
against principles of scheme	2
does not want full time one-way change	6
new parking restrictions have negatively impacted local resident	1
objects to school streets closure as wants to enter during restricted times	2
one-way non compliance	3
perceived displacement	1
scheme doesn't achieve it's principles	1
<b>Grand Total</b>	<b>16</b>

**Hove Junior School (TRO-35-2022)**

**Total Comments** 5  
**Comments in Support** 4  
**Comments in Opposition** 1

<b>Objection comment themes</b>	<b>Count</b>
enforcement at the time of launch is not effective	1
<b>Grand Total</b>	<b>1</b>





## Equality Impact and Outcome Assessment (EIA) Template - 2019

**EIAs make services better for everyone and support value for money by getting services right first time.**

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups<sup>2</sup>. They help us make good decisions and evidence how we have reached these decisions<sup>3</sup>.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age<sup>13</sup>) or use the hyperlinks ('Ctrl' key and left click).

**For further support or advice please contact:**

- BHCC: Communities, Equality and Third Sector Team on ext 2301
- CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)

### 1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed<sup>4</sup>.

<b>Title of EIA<sup>5</sup></b>	Citywide School Streets Programme	<b>ID No.<sup>6</sup></b>	EEC54
<b>Team/Department<sup>7</sup></b>	Transport Projects		
<b>Focus of EIA<sup>8</sup></b>	<p>School Streets support the safe movement of children to and from school by creating streets that allow for more walking, cycling and scooting. Motor vehicle access to streets near school entrances is restricted during school drop off and pick up times which reduces vehicle congestion around the school gates and improves road safety. This in turn encourages and enables active, accessible, and sustainable travel by children and their parents/carers on the school journey.</p> <p>The delivery of a School Streets programme is proposed within the national and local policy context. Nationally, the Government released their 'Gear Change' vision document in July 2020 which sets out the national ambition to make walking and cycling the natural choice for short journeys, or as part of a longer journey. Locally, the new Local Transport Plan 5 (LTP5) is being developed to help everyone</p>		

move around the city more safely, sustainably, and easily. School Streets will support the vision, outcomes and principles of the new LTP5, as agreed by the ETS Committee on 22 June 2021. One of the key principles is shifting how people travel – prioritising walking and cycling for shorter journeys and public transport for longer journeys.

Initially 55 infant, junior and primary schools have been assessed for their eligibility for a School Streets closure. Implementation of infrastructure as part of School Streets will be complemented by support to schools by the Council through School Travel Planning, Personalised Travel Planning for parents/carers, cycle training for children and additional resources for schools to encourage participation in active travel initiatives such as Walk to School Week. Schools that are not eligible for a School Streets closure due to highway feasibility assessments will also receive support through provision of active travel resources and child cycle training delivered by Bike It Officers and Bikeability cycle trainers in schools.

There are currently 10 operational School Streets sites across the city, with two currently under construction and 3 more planned for development in 2023/2024. Due to covid restrictions impacting on the first main batch of sites, post implementation data is limited however dependable quantitative data will be available in the later part of 2023. Qualitative data has and, continues to be collected periodically with a strong theme of overwhelming support for the School Streets programme.

This overarching EIA considers any broad, disproportionate impacts of these changes to highlight any unique factors that might have disproportionate effects on people with protected characteristics.

2. Update on previous EIA and outcomes of previous actions<sup>9</sup>

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
NA	NA	NA

### 3. Review of information, equality analysis and potential actions

Groups to assess	What do you know <sup>10</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>11</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>12</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>13</sup> ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
Age <sup>14</sup>	<p>Residents of Brighton &amp; Hove:</p> <p>41,735 0-15yrs (15%) 196,394 16-64yrs (71%) 38,978 65+ yrs (14%) including over 6% aged over 75.</p> <p>The city's population is predicted to get older, with the greatest projected increases by broad age band in the 60-69 years and 80-84 years categories.</p> <p>Brighton and Hove has a very different age profile compared to the South East and England.</p> <ul style="list-style-type: none"> <li>- Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%)</li> <li>- More working age adults aged 16 to 66 (72%) – South East (64%), England (65%)</li> </ul>	<p>Children of all ages are vulnerable network users, particularly during school run times.</p> <p>It is important for pupils and families to have access to a safe, comfortable and desirable environment for walking, wheeling and bicycle riding to schools and nurseries.</p> <p>Due to operational conflicts, it is possible that not all schools will be able to benefit from a school streets scheme.</p> <p>Changes to the transport network could impact access for carers that operate in the residential community within the closure.</p> <p>Adults of all ages, including those 65+, could be volunteers for volunteer-</p>	<p>Most children aged 5-10 will be directly or indirectly affected, and many children aged 0-4 and 11-15 may also be affected due to families with children of various ages travelling on school runs together and/or the adjacency of impacted schools to each other.</p> <p>Nationwide, children aged below 16 years are by far the most at risk of death or serious injury from motor vehicle crashes in the AM and PM during the school-run time periods (8-9am and 3-4pm) for each. The PM school-run and subsequent hours are particularly dangerous times for school aged children.</p> <p>There is evidence that the school run contributes to detrimental health impacts in school-aged children</p>	<p>All effort must be taken to provide school streets schemes at all schools to ensure that the positive impacts are experienced equally across the city</p> <p>In cases where schools cannot be considered for a school streets scheme due to operational conflicts within the transport network, supplementary measures should be considered to alleviate detrimental impacts of motor vehicle activity at and near the school</p> <p>Pursue opportunities to improve the safety and comfort of all people who may wish to walk, roll, or otherwise use the footway space as permitted.</p> <p>Pursue opportunities to ensure that cycle facilities improve the safety and</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
	<p>- Fewer older people aged over 66 (13%) – South East (17%), England (16%)</p> <p>A third of young people (aged 5 to 16) are physically inactive with around 1 in 3 children are currently driven to their primary school in the city</p> <p>22 % of adults are inactive 59 % adults are overweight or obese. 16% of adults cycle once a week</p>	operated closures.	<p>from automobile emissions, including for both children inside and outside of motor vehicles.</p> <p>School streets closures improve detrimental health and safety impacts of motor vehicle use on school-aged children during the school run time periods.</p> <p>Results from impacts monitoring in peer communities shows that school streets schemes result in reductions in automobile use near schools and for the purposes of school trips, and increases in use of active and sustainable modes for school trips</p> <p>The potential of school streets closures may not be fully realised without additional measures put in place to ensure that non-driving school trips are taken within a safe and</p>	<p>comfort of people of all ages and abilities who may wish to ride a cycle, including but not limited to bicycles and adaptive bicycles.</p> <p>Monitor and maintain implemented schemes to understand impact and determine if and when changes should be made, or additional measures considered</p> <p>Ensure that the infrastructure installed at volunteer-operated schemes does not pose a health and safety risk for older adults</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets maintain access at all times. Carers are exempt from all restrictions, and this is maintained at volunteer / school staff operated sites by gates</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
			<p>comfortable network.</p> <p>It is possible that pupils that are at risk from detrimental impacts or automobile-oriented environments will be excluded because their school will not receive a School Streets scheme due to operational conflicts.</p> <p>Traffic impacts and/or modification of parking linked to street closures or related infrastructure changes could affect the efficiency of care workers and others assisting older adults.</p> <p>Improperly designed or operated infrastructure at volunteer-led closures could pose a health and safety risk for older adults.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how</p>	<p>being opened to grant access to carers. At sites that are signage only, carers are free to enter without a physical barrier.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
			efficiently care workers and others assisting vulnerable people can operate.	
<b>Disability<sup>15</sup></b>	<p>51,000 (22%) of adults in the city have two or more long term health conditions</p> <p>19,000 (8%) of adults in the city have mental and physical disabilities</p> <p>There are c.13,500 blue badge holders in the city</p> <p>There are c. 6,900 disabled concessionary bus pass holders in the city</p> <p>More than one in 20 residents say their day-to-day activities are 'limited a lot' due to a long-term health problem or being disabled.</p>	<p>Loss of access and parking can negatively impact Blue Badge holders, as well as SEND children and families that are not Blue Badge holders</p> <p>Footways and crossings must be of adequate width and design to facilitate safe access</p> <p>Bumps at crossings, controlled crossings and central waiting spaces are helpful for sight impaired people crossing roads.</p> <p>Flat surfaces and dropped kerbs are important for people using mobility aids.</p> <p>Audible signals at pedestrian crossings are important for those with hearing impairments.</p> <p>People with sight loss are</p>	<p>School street closures could diminish access for people with disabilities and special needs of all types.</p> <p>People with disabilities of any type that affects their ability to safely navigate the environment could be put at undue risk if interventions are not designed and operated in a manner that accommodates their needs</p> <p>People with disabilities of any type that affects their ability to access or understand information could be put at risk by changes in the environment that have not been properly communicated to them.</p> <p>Obstructions on the highway and footway and the condition of the pavements/roads put</p>	<p>Blue badge holders should be exempted from enforcement of school street closures.</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets maintain access at all times. Carers are exempt from all restrictions, and this is maintained at volunteer / school staff operated sites by gates being opened to grant access to carers. At sites that are signage only, carers are free to enter without a physical barrier. When included as part of schemes, any footways, crossings and cycling infrastructure, including cycle parking, should be designed and provided to accommodate safe access and use for disabled people</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
		<p>affected by difficulties navigating and seeing changes to signage, barriers and judging distances.</p> <p>People with learning disabilities can find it more difficult to understand the network, or changes to the network.</p> <p>Some disabled people rely heavily on carers visiting them at home and needing to park nearby.</p>	<p>disabled road users at greater risk.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others assisting disabled people living near schools can operate.</p>	<p>Wherever parking bays must be relocated or discontinued, disabled parking bays should only be discontinued as a measure of last resort.</p> <p>If disabled parking bays must be relocated, these need to be as close as possible to previous bay locations.</p> <p>Information shared publicly must be shared in a timely fashion and be accessible and inclusive, as must the mechanisms for consultations.</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets always maintain access</p> <p>Engage with local disability groups to update them on changes to network.</p>
<b>Gender reassignment<sup>16</sup></b>	7.21% of people aged 16 years and over in Brighton and	No specific impacts identified for this group	No specific impacts identified for this group.	There may be a potential safety impact for trans/non-binary children walking



<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
	<p>Hove identify as a different gender than that registered at birth.</p> <p>Statistics are not available for those under 16%.</p>			<p>instead of being dropped at the school gates and being more likely to experience bullying on the way to school. However, the council would never encourage primary school aged children to walk to school without a parent or carer and this will be communicated to all School Streets communities when sites are launched.</p>
<b>Pregnancy and maternity<sup>17</sup></b>	25% of households in the city have dependent children.	<p>People who are pregnant or have recently been pregnant may have greater difficulty managing the school run, particularly if there are multiple children across different age groups in the household.</p> <p>People who are pregnant or have recently been pregnant could be volunteers for volunteer-operated closures</p>	<p>People who are pregnant or have recently been pregnant may be less able or willing to shift from driving to active or sustainable modes when travelling with multiple children and/or children across multiple age groups.</p> <p>Improperly designed or operated infrastructure at volunteer-led closures could pose a health and safety risk for people who are pregnant or have recently been pregnant</p>	<p>Ensure that schools have an up-to-date travel plan.</p> <p>Where possible, ensure that schools arrange a park-and-stride location or there is close by on street parking that acts as a park-and-stride. All park-and-strides should be accessible for those with pushchairs and wheelchairs.</p> <p>Ensure that the infrastructure installed at volunteer-operated schemes does not pose a</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
				health and safety risk for people who are pregnant or have recently been pregnant
<b>Race/ethnicity<sup>18</sup></b> Including migrants, refugees and asylum seekers	19.5% of the city's population are from Black and Racially Minoritised groups, 80.5% are White British.  8.3% of the population do not speak English as their preferred or first language.		People who do not speak English or have poor English skills may struggle to access information about the changes that would help keep them safe.  People from Black and Racially Minoritised groups are often under-represented in engagements and consultations	Ensure interpreting services are available to support customers whose first language is not English.  Share information about the transport changes with local groups for wider dissemination to different communities.  There may be a potential safety impact for children in this group walking instead of being dropped at the school gates and being more likely to experience bullying on the way to school. However, the council would never encourage primary school aged children to walk to school without a parent or carer and this will be communicated to all School Streets communities when

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and foster good relations</li> </ul>
				sites are launched.
<b>Religion or belief<sup>19</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
<b>Sex/Gender<sup>20</sup></b>	<p>The gender split of Brighton &amp; Hove's population is even (50/50).</p> <p>0.35% of people aged 16 years and over identified as non-binary in Brighton and Hove.</p> <p>Among young children and school-aged children (aged 0-15) there are slightly more males (51%) than females (49%).</p> <p>Age 0-4: 12,987</p> <ul style="list-style-type: none"> <li>• Male: 6,715 (52%)</li> <li>• Female: 6,272 (48%)</li> </ul> <p>Age 5-10: 17,384</p> <ul style="list-style-type: none"> <li>• Male: 8,873 (51%)</li> <li>• Female: 8,511 (49%)</li> </ul> <p>Age 11-15: 14,379</p> <ul style="list-style-type: none"> <li>• Male: 7,386 (51%)</li> <li>• Female: 6,993 (49%)</li> </ul>	<p>School aged girls are less likely than school aged boys to travel to school using active or sustainable modes</p> <p>Women are more likely to be travelling with, and accompanying children on, the school run.</p> <p>Women are more likely to be the lone parent in single parent households.</p> <p>Women and girls are more likely to walk or ride a bicycle if they feel the route is safe (both physically and socially).</p> <p>Obstacles on cycling routes are more likely to impact women who may be</p>	<p>Women who are travelling with children are more likely to be impacted by closures and related interventions.</p> <p>Women and girls are more likely to walk, roll, or otherwise use the footway space as permitted if they feel the route is safe (both physically and socially)</p> <p>Protected cycling infrastructure, separated or away from motor vehicles, is more likely to encourage women, girls and families to ride a bicycle.</p> <p>Men and boys who are more confident and/or comfortable are nonetheless put at higher</p>	<p>Pursue opportunities to improve the safety and comfort of all people who may wish to walk, roll, or otherwise use the footway space as permitted. This would include providing drop kerbs where possible and improving surface materials for wheeling.</p> <p>Pursue opportunities to ensure that bicycle facilities improve the safety and comfort of people of all ages and abilities who may wish to ride a bicycle.</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets maintain access at all times.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and foster good relations</li> </ul>
		<p>travelling with children and larger, adapted cycles / cargo cycles.</p> <p>The majority of home and professional caregivers are women.</p> <p>Nationwide, nearly twice as many school-aged boys were injured or killed in road traffic collisions as school aged girls.</p> <p>People of all sex/genders could be volunteers for volunteer-operated closures.</p>	<p>risk of death or serious injury when the network on which they are travelling does not maximise safety for users of all modes in design.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others assisting vulnerable people can operate.</p> <p>Improperly designed or operated infrastructure at volunteer-led closures could pose a health and safety risk for women</p>	<p>Ensure that the infrastructure installed at volunteer-operated schemes does not pose a health and safety risk for people of any gender.</p> <p>Ensure that schools have an up-to-date travel plan.</p>
<b>Sexual orientation<sup>21</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
<b>Marriage and civil partnership<sup>22</sup></b>	There are 8,635 lone parent families in the city	Lone parents often have greater difficulty managing the school run, particularly if there are multiple children across different age groups in the household.	Lone parents may be less able or willing to shift from driving to active or sustainable modes when travelling with multiple children and/or children across multiple age groups.	<p>Ensure that schools have an up-to-date travel plan that consider the needs and options for single-parent households.</p> <p>Where possible, ensure</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and foster good relations</li> </ul>
				that schools arrange a park-and-stride location.
<b>Community Cohesion<sup>23</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
<b>Other relevant groups<sup>24</sup></b>	49,833 (17.2%) of Brighton & Hove residents live in one of the most deprived 20% of areas in England	There is a link between deprivation and access and safety of the transport network	Nationwide, school-aged children from the most deprived quintile of the population are nearly 4-5 times more likely to be killed or seriously injured in a traffic collision than school-aged children from the least deprived quintile of the population	Seek opportunities to incorporate community supportive infrastructure improvements in schemes that are supporting populations or areas of higher deprivation  Consider the levels of deprivation of school student populations, as well as neighbourhood areas of schools, when scoring schools for prioritisation
<b>Cumulative impact<sup>25</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
Assessment of overall impacts and any further recommendations <sup>26</sup>				

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
<p>Brighton &amp; Hove City Council (BHCC) declared a climate and biodiversity emergency in December 2018 and committed to becoming a carbon neutral city by 2030. BHCC has created a programme of works that will help residents, visitors and businesses play their part and get the benefits of reaching the 2030 target. These include an improved and healthier environment for everyone and reducing the impacts of the climate and biodiversity emergency. Over a third of Brighton &amp; Hove's carbon emissions come from transport and the BHCC Climate Assembly acknowledged that the city needs to see a shift to public transport and active forms of travel to bring down the carbon and nitrous oxide emissions, which affect everyone in the city. 10 recommendations were made by the BHCC Climate Assembly to be considered by the council in developing its Local Transport Plan and Local Cycling and Walking Infrastructure Plan. This includes numerous points that School Streets are able to satisfy, notably the creation of healthier low traffic/pedestrianised communities.</p> <p>School Streets schemes are a global success, with over 1000 school streets around the world and half of these in the UK. School Streets schemes reduce congestion and vehicles travelling through the School Street, reduce pollution around the school entrance, encourage more walking, cycling, wheeling and active journeys from pupils and parents/carers, result in less inconsiderate parking and dangerous manoeuvres, create a calmer, safer and cleaner environment, encourage independent mobility and create space for community connection and sociability.</p> <p>In Brighton and Hove restrictions are timed for 2 respective 1 hour sessions; morning drop off and afternoon pick up. School Streets schemes have clear benefits for all residents in the city, there are however some potential negative impacts for certain people and/or groups as a result of timed closures. The following table lists these potential negative impacts and advises recommendations on how to overcome them:</p>				
<b>Potential negative impact</b>		<b>Recommendations for mitigation</b>		
Parents/carers may experience greater difficulty managing the school run, particularly if there are multiple children across different age groups in the household.		Road closure restrictions are to operate within reasonably close proximity to the school so that those people who have to drive to school due their personal circumstances can park within a short walking distance to the school. Where possible, introduce park-and-stride and walking bus schemes to support parents at drop off and pick up.		
Improperly designed or operated infrastructure at manned closures could pose a health and safety risk for all groups		Training to be provided to all individuals who operate closures and a guidance document is provided upon appointment which refresher training sessions offered periodically. Road Safety		

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
			Audits are undertaken at stage 1, 2 and 3 on all schemes and required changes to schemes will be implemented in line with safety requirements.	
Removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others assisting vulnerable people can operate.			Care workers will be granted access to closures at all times, if visiting a resident/business that is within the closure. Pay and Display parking will be maintained wherever practicably possible.	
People with disabilities who are not blue badge holders may be impacted by access restrictions as they will not be able to enter closed roads in a motor vehicle during restricted hours.			People with disabilities who are not blue badge holders who need to enter the closure for permitted reasons will always be granted access i.e. residents, attend the school, work within the closure.	
People who do not speak English or have poor English skills may struggle to access information about the changes that would help keep them safe.			Translated information will be available on request and the BHCC will work with schools to identify any individuals that would benefit from translated information and provide this to communities.	
Restricted access for all groups during the construction phase.			During the construction phase, BHCC will be working with the contractor to ensure access is maintained. This will be a requirement of the works and further details will be provided in the phasing of the scheme and made available via communications and / or on the BHCC website. On site supervision will ensure this is monitored and access is reasonably maintained.	
Potential for trans/non binary and children from a different race/ethnic/religious backgrounds to be at risk of bullying if walking to school alone.			The council would never encourage primary school age children to walk to school without a parent or carer and this is communicated with all in School Streets communities. Furthermore, the School Streets team will liaise Community Safety Team and FCL to learn more and mitigate these potential impacts.	
School Streets is a rolling programme and is always adapting and evolving based on lessons learnt and knowledge acquired as more schemes are developed. Officers are committed to revisiting the EIA on a yearly basis in line with the programme, to assess impacts against the changeable nature of the programme i.e. different sites require many different measures.				





#### 4. List detailed data and/or community feedback that informed your EIA

<b>Title</b> (of data, research or engagement)	<b>Date</b>	<b>Gaps in data</b>	<b>Actions to fill these gaps: who else do you need to engage with?</b> (add these to the Action Plan below, with a timeframe)
BHCC Corporate Plan 2020-2023	2020		
Brighton & Hove Joint Health and Wellbeing Strategy 2019-2030	2019		
Developing a new transport plan for Brighton & Hove, BHCC	September 2021		
Mid-Year Population Estimates, UK, June 2020 <a href="#">Office for National Statistics</a>	2021		
School Streets East Sussex Trial Project 2021 <a href="#">East Sussex County Council</a>	2021		
Reported Road Casualties Great Britain Annual Report - DfT	2018, 2019, 2020		
Road injury prevention: Resources to support schools to promote safe active travel - <a href="#">Public Health England</a>	2016		

School Street Closures and Traffic Displacement Project: A Literature Review with Semi-Structured Interviews – Dr. Adrian Davis, Edinburgh Napier University	August 2020		
School Streets: Intervention Sites vs. Control Sites Full Report – <a href="#">Transport for London</a>	January 2021		
School Streets: Reducing children's exposure to toxic air pollution and road danger – <a href="#">Possible, Mums for Lungs</a>	January 2021		
Equalities Impact Assessment – Local Transport Plan 5 initial document	August 2021		
Equalities Impact Assessment - Active Travel Fund Programme (Tranche 2)	July 2021		
Public consultations on the development of design options for school streets schemes	2021/2022 and 2022/2023 scheme consultation complete. As this is a rolling programme, consultation will be on-going each year at specific locations.		

Active and Inclusive Travel Forum	Ongoing		
Census 2021 data	March 2023		

## 5. Prioritised Action Plan<sup>27</sup>

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
All	Ensure clear, accessible, timely and inclusive information about the changes to the transport network and is published publicly, as well as the process being followed	More people aware of what the council is doing and why, and can plan their journeys accordingly	Fewer public enquiries about the changes	As and when changes to the transport network are made and/or altered
All (particularly disabled people, Black and Racially Minoritised groups and carers)	Share information about transport network changes with schools, residents, and local community/representative groups in appropriate formats to disseminate widely	Wider groups are aware and understand the changes and can plan their journeys accordingly	Fewer public enquiries about the changes from specific groups of users	As and when changes to the transport network are made and/or altered
All (particularly underrepresented groups)	Engage further with schools, residents, charities and local community/representative groups to understand the key transport and travel issues for specific communities/user groups	Feedback from specific communities / user groups will shape future changes	Fewer negative impacts/ complaints about the measures from specific user groups	Throughout the planning, implementation, and ongoing monitoring phases of the program
All	Provide alternative mechanisms for people to feed back their views.	People with limited or no access to the internet can constructively share their views on the changes	Wider range of views inform the design of future transport changes	Throughout the planning, implementation, and ongoing monitoring phases of the program
All	Ensure measures that reallocate road space for walking and bicycle riding	Transport network users of all ages, abilities, and comfort levels are able to	No complaints about the ability to utilise active travel from the changes	Throughout the planning, implementation, and ongoing monitoring

	meet design and accessibility standards for people of all ages, abilities, and comfort levels	utilise the new measures safely and without obstruction	or incidents /injury caused.  Road safety audits not highlighting any issues with the design of schemes for disabled people.	phases of the program
All (but particularly parents and pregnant people, women and girls, school-aged children, disabled people)	Ensure measures that reallocate road space for walking and bicycle riding are designed to maximise use by people of all comfort levels	Transport network users of all ages, abilities, and genders feel safe and comfortable utilising the new measures	Decrease in number of users citing safety and comfort as a barrier to active travel for school trips	Throughout the planning, implementation, and ongoing monitoring phases of the program
All (but particularly lone parents and/or pregnant people or people who were recently pregnant)	Ensure that schools have an up-to-date travel plan that considers needs of different user groups and clearly defines options for families of all situations.  Where possible, ensure that schools arrange a park-and-stride location.	Affected groups are aware and understand the changes and their options and can plan. their journeys accordingly  People who are unable or unwilling to forgo a private motor vehicle are provided with a clear, safe location to park for pick-ups and drop offs.	Fewer public enquiries about the changes.  Fewer negative impacts/ complaints about the measures.  Decrease in the number of pick ups and drop offs on nearby neighbourhood streets.	As changes to the transport network are planned and implemented
Disabled people	Ensure measures that reallocate road space for walking and bicycle riding meet design and accessibility standards for people of all abilities, and are an appropriate width to accommodate adapted cycles and child trailers.	Transport network users of all ages, abilities, and comfort levels are able to utilise the new measures safely and without obstruction.	No complaints about the accessibility of the changes from disabled people or incidents/ injury caused.  Road safety audits not highlighting any issues with the design of schemes for disabled people.	Throughout the planning, implementation, and ongoing monitoring phases of the programme.

Disabled people	Ensure that the placement and operation of signs and barriers do not cause obstructions for disabled users	Disabled people are unimpeded when using reallocated space	No complaints about the accessibility of the changes from disabled people or incidents/injury caused	As changes to the transport network are planned and implemented
Disabled people	Ensure essential access for disabled people is maintained in all areas	Disabled people are not prevented from accessing school street closures	No complaints about the accessibility of the changes from disabled people	As changes to the transport network are planned and implemented
Disabled people	Wherever possible, ensure disabled parking bays are not removed, but if this is necessary, relocate bays to the nearest possible site	Disabled car users are not disadvantaged or prevented from accessing school street closures	No complaints about the accessibility of the changes from disabled people	As changes to the transport network are planned and implemented
People with low or no income	Seek opportunities to incorporate community supportive infrastructure improvements in schemes that are supporting populations or areas of higher deprivation	Transport network users of all ages, abilities, and comfort levels from higher-deprivation populations or areas are able to utilise the new measures safely and without obstruction	<p>No complaints about the changes from or regarding people with lower incomes</p> <p>Road safety audits not highlighting any issues with the design of schemes</p> <p>Decrease number of users citing safety and comfort as barriers to active travel</p>	Throughout the planning, implementation, and ongoing monitoring phases of the program
People with low or no income	Consider the levels of deprivation of school student populations, as well as neighbourhood areas of schools, when scoring schools for prioritisation	Schools with students from higher-deprivation populations and/or are located in higher-deprivation areas are given additional points towards prioritisation	Number of schools with students from higher-deprivation populations and/or are located in higher-deprivation areas being prioritised for a scheme each year	Throughout the planning and monitoring phases of the program

**EIA sign-off:** (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

**Staff member completing Equality Impact Assessment:** Jazmine Hayes, Senior Project Manager

**Date:** 18<sup>th</sup> April 2023

**Directorate Management Team rep or Head of Service/Commissioning:** David Parker, Head of Transport Projects & Engineering

**Date:** 18<sup>th</sup> April 2023

**CCG or BHCC Equality lead:** Chris Brown, EDI Officer; signed off 02/08/2023; Sabah Holmes, EDI Manager - Approved Date: 07<sup>th</sup> August 2023

## Guidance end-notes

<sup>1</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

### <sup>2</sup> Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people in relation to their 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

**The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:**

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
  - Remove or minimise disadvantages suffered by people due to their protected characteristics
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
  - Tackle prejudice
  - Promote understanding



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<sup>3</sup> EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

<sup>4</sup> **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

**Do you need to complete an EIA? Consider:**

- Is the policy, decision or service likely to be relevant to a specific group or groups (eg: older people)?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

<sup>5</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

<sup>6</sup> **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

<sup>7</sup> **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

<sup>8</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

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This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>9</sup> **Previous actions:** If there is no previous EIA or this assessment is of a new service, then simply write 'not applicable'.

<sup>10</sup> **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?<sup>10</sup>
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#> ) and national ones where they are relevant.

<sup>11</sup> **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
  - (a) consult when proposals are still at a formative stage;
  - (b) explain what is proposed and why, to allow intelligent consideration and response;
  - (c) allow enough time for consultation;
  - (d) make sure what people tell you is properly considered in the final decision.

- 
- Try to consult in ways that ensure all perspectives can be considered.
  - Identify any gaps in who has been consulted and identify ways to address this.

<sup>12</sup> Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
  - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
  - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  - If there is negative differential impact, how can you minimise that while taking into account your overall aims
  - Do the effects amount to unlawful discrimination? If so the plan must be modified.
  - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

<sup>13</sup> Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

<sup>14</sup> **Age:** People of all ages

<sup>15</sup> **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

<sup>16</sup> **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

<sup>17</sup> **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

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<sup>18</sup> **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

<sup>19</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

<sup>20</sup> **Sex/Gender:** Both men and women are covered under the Act.

<sup>21</sup> **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

<sup>22</sup> **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

<sup>23</sup> **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

<sup>24</sup> **Other relevant groups:** e.g.: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

<sup>25</sup> **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

<sup>26</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

<sup>27</sup> **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.

# **BRIGHTON & HOVE CITY COUNCIL ROAD TRAFFIC REGULATION ACT 1984**

## **Brighton & Hove (Prohibition of Motor Vehicles) (Westdene) Experimental Order 2022 (TRO-30-2022) Amendment Order No.1 2022(TRO-30a-2022)**

NOTICE is hereby given that Brighton & Hove City Council ("the Council") made the above-named experimental Order ("the Order") on the 26<sup>th</sup> October 2021 under the relevant provisions of the Road Traffic Regulation Act 1984 as amended which comes into force on 15th November 2022. This order is a modification of the existing Brighton & Hove (Prohibition of Motor Vehicles) (Westdene) Experimental Order 2022 which came into force on 14th November 2022 for a period not exceeding eighteen months. The effect of the Order will be as follows:

- Amends the descriptions for new no waiting at any time (double yellow lines) in Dene Vale/Mill Rise (no changes will be made on ground)

A copy of the experimental Order as made, a plan showing the lengths of road affected and a statement of the Council's reasons for making the Order may be seen online at [www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros)

The Council will be considering in due course whether the provisions of the experimental Order should be continued in force indefinitely. Any person wishing to object to such indefinite continuation of the provisions may within a period of six months from 15<sup>th</sup> November 2022, (or if this Order is varied by another Order or modified pursuant to section 10(2) of the Act, six months from the day on which the variation or modification or the latest variation or modification came into force) object in writing stating the grounds on which that objection is being made.

Objections should be sent to the Executive Director Economy, Environment & Culture, Brighton & Hove City Council Parking Design & Implementation Team, G40 Hove Town Hall, Norton Road Hove, BN3 3BQ or by e-mail to [TROcomment@brighton-hove.gov.uk](mailto:TROcomment@brighton-hove.gov.uk) or online (see details above) no later than. In all cases the reference TRO-30a-2022 should be quoted.

Any person who wishes to question the validity of the experimental Order or of any of its provisions on the grounds that it or they are not within the powers conferred by the Act, or that any requirements of the Act or of any instrument made under it have not been complied with may, within six weeks from the date on which the Order was made, apply to the High Court for that purpose.

Dated: 28<sup>th</sup> October 2022

Executive Director Economy, Environment & Culture  
Brighton & Hove City Council  
c/o Parking Design & Implementation  
Room G40  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ  
[www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros)

**ROAD TRAFFIC REGULATION ACT 1984  
BRIGHTON & HOVE CITY COUNCIL**

**Brighton & Hove (Various Restrictions) (Westdene) Experimental Order 2022  
Amendment No.1 2022**

Brighton & Hove City Council in exercise of its powers under sections 9 and 10 of the Road Traffic Regulation Act 1984 ("the Act") as amended and Part IV of Schedule 9 to the Act and of all other enabling powers and after consultation with the Chief Officer of Police in accordance with Part III of Schedule 9 to the Act hereby makes the following Order:

1. This Order may be cited as the Brighton & Hove (Various Restrictions) (Westdene) Experimental Order 2022 Amendment No.1 2022 and shall come into operation on the 15<sup>th</sup> day of November 2022.
2. The Council's Executive Director Economy, Environment & Culture or any person authorised by him is authorised to modify or suspend the operation of this Order or any of it in accordance with the provisions of section 10(2) of the Act.
3. Any reference in this Order to any enactment shall be construed as a reference to that enactment as amended applied consolidated or re-enacted by or as having effect by virtue of any subsequent enactment.
4. In so far as any provision of this Order conflicts with a provision which is contained in an Order made or having effect as if made under the Act, and existing when this Order comes into operation, and which imposes a restriction or prohibition on movement by vehicles or grants an exemption from such restriction or prohibition, the provisions of this Order shall prevail.
5. Brighton & Hove (Various Restrictions) (Westdene) Experimental Order 2022 is amended as follows:

Paragraph 8 Brighton & Hove Outer Areas (Waiting, Loading and Parking) and Cycle Lanes Consolidation Order 2018 is amended as follows:



## **Schedule 1**

### **Part 1.1 No Waiting At Any Time**

Delete the following items:

<b>Item No.</b>	<b>Road Name</b>	<b>Side</b>	<b>Description</b>
468	Dene Vale	North	From the western kerbline of Barn Rise westwards for a distance of 41.8 metres
469	Dene Vale	South	From a point 4 metres east of the western building line of Church Hall of the Ascension eastwards for a distance of 5.1 metres

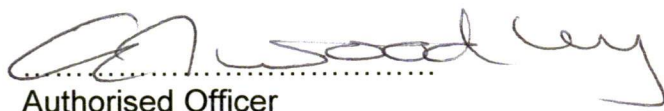
Add the following items:

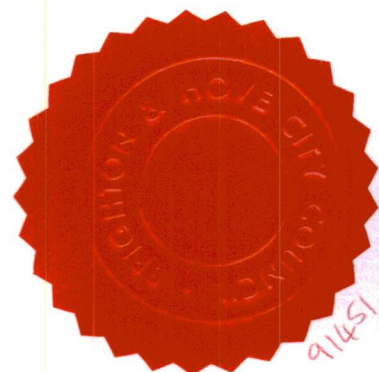
<b>Item No.</b>	<b>Road Name</b>	<b>Side</b>	<b>Description</b>
468	Dene Vale/ Mill Rise	North	From the western kerbline of Barn Rise westwards for 41.8 metres
469	Dene Vale/ Mill Rise	South	From a point 4 metres east of the western building line of Church Hall of the Ascension eastwards for 51.1 metres.
1446	Mill Rise/Dene Vale	North	From the western kerbline of Barn Rise westwards for 41.8 metres
1447	Mill Rise/Dene Vale	South	From a point 4 metres east of the western building line of Church Hall of the Ascension eastwards for 51.1 metres.

**MADE UNDER THE COMMON SEAL OF  
BRIGHTON & HOVE CITY COUNCIL**

This 26<sup>th</sup> day of October 2022

**THE COMMON SEAL OF BRIGHTON & HOVE CITY  
COUNCIL** was affixed to this Order in the presence of

  
Authorised Officer



# **BRIGHTON & HOVE CITY COUNCIL ROAD TRAFFIC REGULATION ACT 1984**

**Brighton & Hove (Prohibition of Motor Vehicles) (Westdene) Experimental Order 2022 (TRO-30-2022) Amendment Order No.1 2020 (TRO-30a-2020)**

## **STATEMENT OF REASONS**

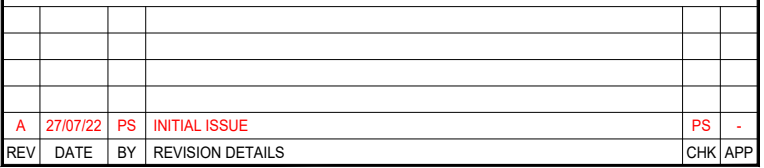
Following the introduction of the Brighton & Hove (Prohibition of Motor Vehicles) (Westdene) Experimental Order 2022 it has been noticed that one of the road names is incorrect in the descriptions for the no waiting at any time (double yellow lines).

This order amends the error and changes the descriptions for the section which is on Dene Vale/Mill Rise.

Dated: 28<sup>th</sup> October 2022

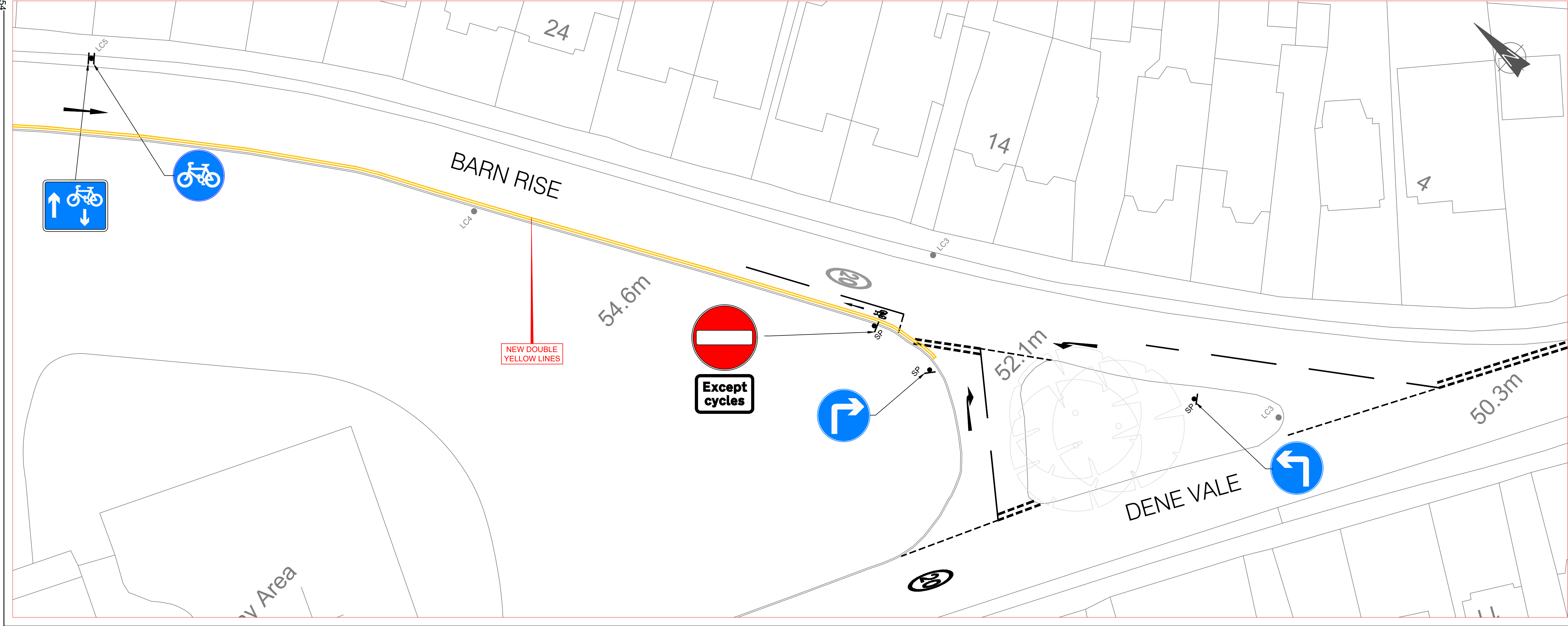
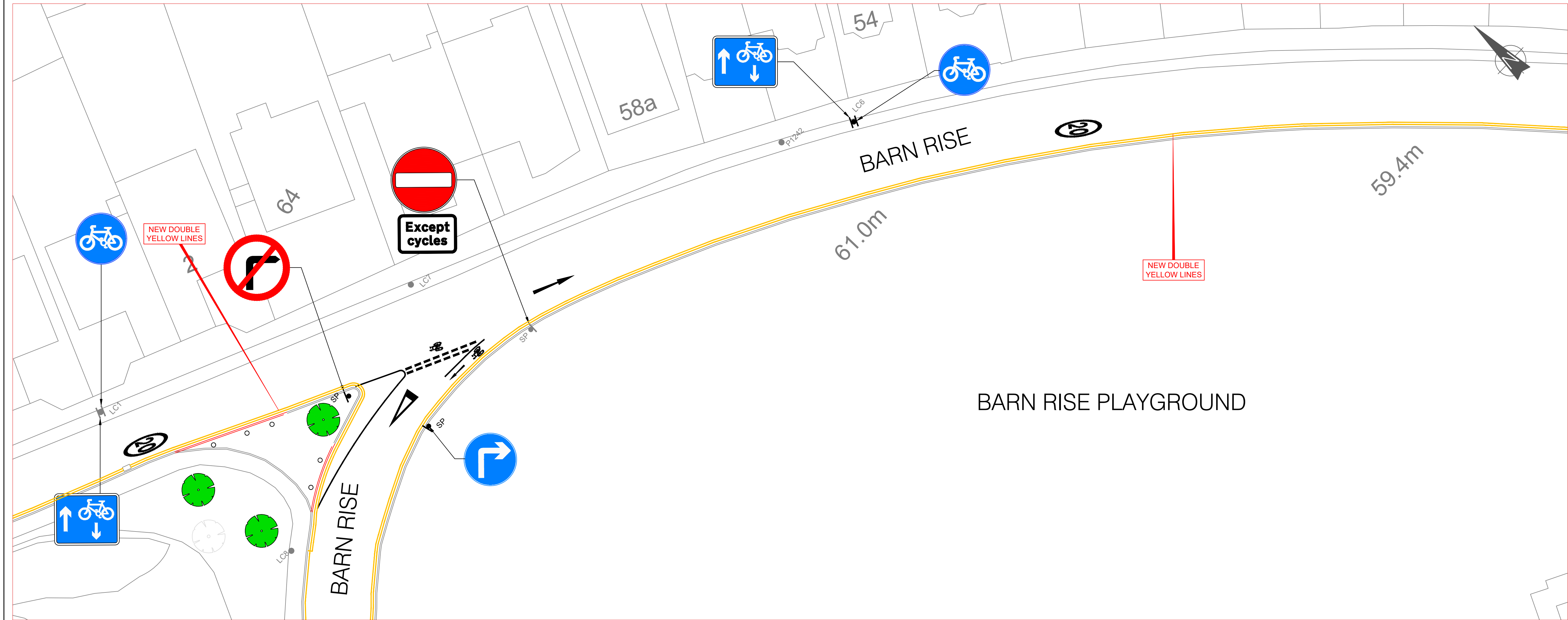
Executive Director Economy, Environment & Culture  
Brighton & Hove City Council  
c/o Parking Infrastructure  
Room G40  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ





File Location: \\admin.brighton-hove.gov.uk\shared\Environment\Road Schemes\001 CURRENT PROJECTS- HIGHWAYS latest\Sustainable School Streets BAS\2.0 Project Data\2.2 Drawings\Working Drawings\BHCC-SSS-0004 - WESTDENE PRIMARY



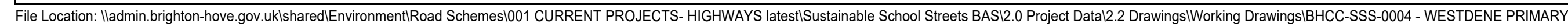



LEGEND:

REV	DATE	BY	REVISION DETAILS	CHK	APP
A	27/07/22	PS	INITIAL ISSUE	PS	-

PROJECT: BHCC SAFER SCHOOL STREETS - PHASE 1 WESTDENE PRIMARY SCHOOL			
TITLE: TRAFFIC REGULATION ORDER DRAWING 2			
DRAWING STATUS: DESIGN			
DRAWN: PS	SURVEYED: -	CHECKED: BS	APPROVED: -
DRAWING No: BHCC-SSS-0004 - TRO - 02			
DATE: JULY 2022	SCALE: 1:200	SIZE: A1	REV: A





				
<b>PROJECT:</b> <b>BHCC SAFER SCHOOL STREETS - PHASE 1</b> <b>WESTDENE PRIMARY SCHOOL</b>				
<b>TITLE:</b>  <b>CAR PARKING</b> <b>DRAWING 3</b>				
<b>DRAWING STATUS:</b>				
<b>DESIGN</b>				
<b>DRAWN:</b>  PS	<b>SURVEYED:</b>  -	<b>CHECKED:</b>  BS	<b>APPROVED:</b>  -	
<b>DRAWING No:</b> BHCC-SSS-0004 - TRO - 03				
<b>DATE:</b> JULY 2022	<b>SCALE:</b> 1:200	<b>SIZE:</b> A1	<b>REV:</b> A	

# **BRIGHTON & HOVE CITY COUNCIL ROAD TRAFFIC REGULATION ACT 1984**

## **Brighton & Hove (Prohibition of Motor Vehicles) (Hove Junior) Experimental Order 2022**

### **STATEMENT OF REASONS**

In a “School Streets” scheme, all non-exempt motor vehicle access to streets near school entrances is restricted during school drop off and pick up times, principally to reduce vehicle congestion around the school gates and improve road safety. This also encourages and better enables active and sustainable travel by children and their parents/carers on the school journey.

In October 2021 the Council mandated the delivery of a School Streets programme within the prevailing national and local policy context. Nationally, the Government released their ‘Gear Change’ vision document in July 2020 which sets out the national ambition to make walking and bicycle riding the natural choice for short journeys, or as part of a longer journey. Locally, the new Local Transport Plan 5 (LTP5) is being developed to help everyone move around the City more safely, sustainably, and easily. School Streets will further support the vision, outcomes and principles of the new LTP5, as agreed by the ETS Committee on 22 June 2021. One of the key principles is shifting how people travel – prioritising walking and bicycle riding for shorter journeys and public transport for longer journeys.

In service of the fulfilment of a School Streets scheme at Hove Junior School, parts of School Road and Marmion Road will be closed to non-exempt motor vehicle traffic at school drop off and pick up times. The enforcement hours for this School Street will be Monday to Friday 8.15am to 9.15am and 2.45pm to 3.45pm -Term Time Only.

In support of the mission and aims of this School Streets scheme, the existing widened footpath in School Road will be extended both along and into the carriageway. This extension will require the discontinuation of some parking bays on the west side of the street and the installation of a new guardrail to cover the widened perimeter of the extension. While the carriageway will remain bidirectional, a one-way give-way point will be created where the extended crossings meet on both sides of the carriageway.

Dated: 18<sup>th</sup> November 2022

Executive Director Economy, Environment & Culture  
Brighton & Hove City Council  
c/o Parking Design & Implementation Team  
Room G40  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ



**ROAD TRAFFIC REGULATION ACT 1984  
BRIGHTON & HOVE CITY COUNCIL**

**Brighton & Hove (Prohibition of Motor Vehicles) (Hove Junior) Experimental Order 2022**

Brighton & Hove City Council in exercise of its powers under sections 9 and 10 of the Road Traffic Regulation Act 1984 ("the Act") as amended and Part IV of Schedule 9 to the Act and of all other enabling powers and after consultation with the Chief Officer of Police in accordance with Part III of Schedule 9 to the Act hereby makes the following Order:

1. This Order may be cited as the Brighton & Hove (Prohibition of Motor Vehicles) (School Road) Experimental Order 2022 and shall come into operation on the 3<sup>rd</sup> day of January 2023.
2. The Council's Executive Director Economy, Environment & Culture or any person authorised by him is authorised to modify or suspend the operation of this Order or any of it in accordance with the provisions of section 10(2) of the Act.
3. Any reference in this Order to any enactment shall be construed as a reference to that enactment as amended applied consolidated or re-enacted by or as having effect by virtue of any subsequent enactment.
4. In so far as any provision of this Order conflicts with a provision which is contained in an Order made or having effect as if made under the Act, and existing when this Order comes into operation, and which imposes a restriction or prohibition on movement by vehicles or grants an exemption from such restriction or prohibition, the provisions of this Order shall prevail.
5. The Brighton & Hove (Prohibition of Motor Vehicles) (Schools Street) Order 2021 Amendment Order No.1 2022 is amended as follows:

Add new item into Schedule 1 as follows:

1.	2.	3.
Item No.	Road	Description
4a	Marmion Road	From the junction with School Road to its junction with Mainstone Road
6a	School Road	From the junction with Portland Road to its junction with Milnthorpe Road

6. The Brighton & Hove Various Controlled Parking Zones Consolidation Order 2018 is amended as follows:-

## Schedule 1 Zone R

### **Part 5.1 - Shared Permit or Pay & Display Parking Places Monday to Sunday - 9am to 8pm - Low Tariff Short Term - 2 hours (No return within 4 hours)**

Delete the following items:-

Item No.	Street Name	Side of Road	Description	Zone
23	School Road	West	From a point 10 metres north of the northern kerbline of Portland Road to a point 6 metres south of the southern kerbline of Kingsthorpe Road	R

Add the following items:-

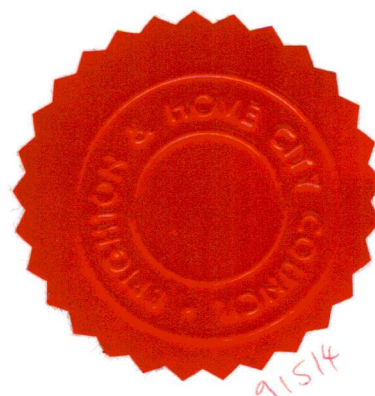
Item No.	Street Name	Side of Road	Description	Zone
23	School Road	West	From a point 12 metres north of the northern kerbline of Portland Road northwards for a distance of 15.5 metres	R
23b	School Road	West	From a point 24.5 metres south of the southern kerbline of Milnthorpe Road southwards for a distance of 24 metres	R
23c	School Road	West	From a point 5.7 metres north of the northern kerbline of Milnthorpe Road northwards for a distance of 10.2 metres	R
23d	School Road	West	From a point 5.5 metres south of the southern kerbline of Dallington Road southwards for a distance of 9.7 metres	R
23e	School Road	West	From a point 5.6 metres south of the southern kerbline of Kingsthorpe Road southwards for a distance of 25.8 metres	R

**MADE UNDER THE COMMON SEAL OF  
BRIGHTON & HOVE CITY COUNCIL**

This 16<sup>th</sup> day of November 2022

**THE COMMON SEAL OF BRIGHTON & HOVE CITY  
COUNCIL** was affixed to this Order in the presence of

  
Authorised Officer





# **BRIGHTON & HOVE CITY COUNCIL**

## **ROAD TRAFFIC REGULATION ACT 1984**

### **Brighton & Hove (Prohibition of Motor Vehicles) (Hove Junior) Experimental Order 2022 (TRO-35-2022)**

NOTICE is hereby given that Brighton & Hove City Council ("the Council") made the above named experimental Order on the 16<sup>th</sup> November 2022 under the relevant provisions of the Road Traffic Regulation Act 1984 as amended which comes into force on 3<sup>rd</sup> January 2023 for a period not exceeding eighteen months. The effect of the Order will be as follows:

- Prohibition of Motor Vehicles Monday to Friday 8.15am to 9.15am and 2.45pm to 3.45pm - Term Time Only except for access in Marmion Road (From the junction with School Road to its junction with Mainstone Road) and School Road (from Portland Road to of the junction with Milnthorpe Road) to encourage active and sustainable travel.
- The existing widened footpath will be extended both along and into the carriageway. It will remove some of shared permit and paid parking bays on the west side of School Road will be replaced with double yellow lines.

NOTICE is also given that the Council, pursuant to powers contained in Section 90A (1) of the Highways Act 1980 as amended, proposes to construct a flat top road hump (maximum height 75mm) at the following locations:

- School Road from a point 20 meters north of its junction with Marmion Road northwards for 9.3 metres
- School Road from a point 28.6 meters north of its junction with Portland Road northwards for 19.7 metres
- Marmion Road at its junction with School Road eastwards for 5 metres

A copy of the experimental Order as made, a plan showing the lengths of road affected and a statement of the Council's reasons for making the Order may be seen online at [www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros) and more details about this project can be found at [www.brighton-hove.gov.uk/travel-and-transport](http://www.brighton-hove.gov.uk/travel-and-transport)

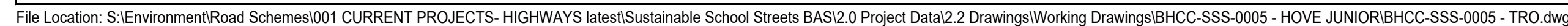
The Council will be considering in due course whether the provisions of the experimental Order should be continued in force indefinitely. Any person wishing to object to such indefinite continuation of the provisions may within a period of six months from, (or if this Order is varied by another Order or modified pursuant to section 10(2) of the Act, six months from the day on which the variation or modification or the latest variation or modification came into force) object in writing stating the grounds on which that objection is being made. Objections should be sent to the Executive Director Economy, Environment & Culture, Brighton & Hove City Council Parking Design & Implementation Team, G40 Hove Town Hall, Norton Road Hove, BN3 3BQ or by e-mail to [TROcomment@brighton-hove.gov.uk](mailto:TROcomment@brighton-hove.gov.uk) or online (see details above) no later than. In all cases the reference TRO-35-2022 should be quoted.






Any person who wishes to question the validity of the experimental Order or of any of its provisions on the grounds that it or they are not within the powers conferred by the Act, or that any requirements of the Act or of any instrument made under it have not been complied with may, within six weeks from the date on which the Order was made, apply to the High Court for that purpose.

Dated: 18<sup>th</sup> November 2022

Executive Director Economy, Environment & Culture  
Brighton & Hove City Council  
c/o Parking Design & Implementation  
Room G40  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ  
[www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros)





	TSRGD DIAG 1018.1
	TSRGD DIAG 1003A
	TSRGD DIAG 1009A
	TSRGD DIAG 1004.1
	TSRGD DIAG 1062

A	28/10/22	PS	INITIAL ISSUE				BS	-
REV	DATE	BY	REVISION DETAILS				CHK	APP



DRAWING No:			
BHCC-SSS-0005 - TRO			
DATE:	SCALE:	SIZE:	REV:
OCTOBER 2022	1:500	A1	A



# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 34

**Subject:** 56-57 Lewes Road – objections to Traffic Regulation Order in Caledonian Road

**Date of meeting:** 3<sup>rd</sup> October 2023

**Report of:** Executive Director Economy, Environment & Culture

**Contact Officer:** Name: Eleanor Templeton  
Email: Eleanor.Templeton@brighton-hove.gov.uk

**Ward(s) affected:** Round Hill; Hanover and Elm Grove

**For general release**

### **1. Purpose of the report and policy context**

- 1.1 The purpose of this report is to inform the committee of objections to the proposal to provide a blue badge holder parking bay on Caledonian Road, adjacent to the entrance to a development at 56 – 57 Lewes Road, Brighton. The proposed bay is located on the north side of Caledonian Road, from a point 7m west of the junction with Lewes Road, for a distance of 6m.
- 1.2 This report provides the officer response to those objections and requests that these are now considered by the committee with a view to approving the Traffic Regulation Order.

### **2. Recommendations**

- 2.1 That the Committee having taken account of all duly made representations and comments, agrees that the following Traffic Regulation Order is approved and is implemented:

*Brighton & Hove Various Controlled Parking Zones Consolidation Order 2018 Amendment Order No.\* 202\* (TRO-11-2022)*

### **3. Context and background information**

- 3.1 Under planning application reference BH2020/01696, the conversion of 56 – 57 Lewes Road from food retail use to student accommodation and flexible retail/café use was approved by council's Planning Committee on 5<sup>th</sup> March 2021. The supporting evidence, which has already been agreed by the Council as being appropriate and accurate, notes the need for a blue badge holder parking bay. The existing cycle parking facilities are to be relocated and the area vacated to be established as a blue badge holder parking bay.
- 3.2 The main entrance of the student accommodation element of the proposal is to be moved to Caledonian Road. The Local Highway Authority considered that it was necessary to include a blue badge holder space adjacent to the new entrance for the benefit of prospective tenants, their guests, visitors, users of the retail/café space, and local residents.



- 3.3 The five cycle stands are to be relocated on Lewes Road as follows: four stands on the footway opposite the development, to the south of the Franklin Road junction; one stand (adjacent to two existing stands) on the footway opposite the development, to the south of the St. Leonard's Road junction (see Appendix 3).
- 3.4 The Loading/Unloading bay to the west of the proposed Blue Badge Holder Bay is unchanged by this amendment.
- 3.5 The Highway Authority received 13 items of correspondence to the proposals that were advertised in *TRO-11-2022*. The comments from all objectors followed a similar theme and are summarized in paragraph 5.5.

#### **4. Analysis and consideration of alternative options**

- 4.1 Option 1: do nothing – blue badge holder parking bay is not implemented as per planning approval BH2020/01696.
- 4.2 Option 2: retain cycle stands in inset bay and incorporate blue badge holder parking bay – Swept Path Analysis drawing (Background Document 1) shows that large delivery or refuse vehicles would not have enough space to be able to enter and exit the bay safely.
- 4.3 Option 3: find another location for the blue badge holder parking bay – The main entrance for the student accommodation element of the proposal is to be moved to Caledonian Road. The Highway Authority considered that it was necessary to include a blue badge holder space adjacent to the new entrance for the benefit of prospective tenants, their guests, visitors, users of the retail/café space, and local residents.

#### **5. Community engagement and consultation**

- 5.1 A Traffic Regulation Order was advertised on 25th March 2022 with the closing date for comments and objections on the 15th April 2022. The Ward Councillors for the areas were consulted, as were the statutory consultees. At the time of the consultation, the development site was within the St Peter's and North Laine Ward.
- 5.2 The notice was published in the Argus newspaper on the 25th March 2022.
- 5.3 A plan and the Traffic Regulation Order were available to view online. The Statement of Reasons is shown in Appendix 1. The plan of the proposals is shown in Appendix 2.
- 5.4 There were no objections to the installation of the blue badge holder parking bay. The objections related to the displacement of the five existing cycle stands as a result of introducing a blue badge holder parking bay at this location.
- 5.5 A summary is given below:

- The TRO application did not illustrate where the five stands would be relocated to
- Relocating the stands to a footway location instead of in the carriageway is taking away space for pedestrians and could cause obstructions to movement
- It should not be necessary to relocate the stands as there is sufficient space in the existing loading bay for the cycle stands and a Disabled bay
- There should be additional cycle stands provided to promote sustainable, active travel
- Relocating the cycle stands will incur costs to the council
- The quality of stands to be provided has not been specified

5.6 The Highways response to the above points is as follows:

- The proposed locations are shown on the drawing in Appendix 3 (on the footway of Lewes Road, opposite the development).
- There is more than adequate footway space behind the cycle stands at each location (greater than 3m). Dimension are shown on the plan in Appendix 3.
- A swept path analysis drawing (Background Document 1) shows the entry and exit manoeuvre of a 10.7m articulated vehicle (the same length as a refuse lorry). This illustrates that there would be insufficient space in the inset bay to accommodate loading, blue badge holder parking and cycle parking. Large delivery or refuse vehicles would not have enough space to be able to enter and exit the bay safely.
- Four additional stands are to be provided on the footway of Lewes Road, outside the development (shown in green on the plan in Appendix 3)
- The developer will bear the cost of the TRO application and implementation of works.
- The stands provided will be to BHCC / industry standard specifications acceptable to visibility impaired user groups.

## 6. Conclusion

- 6.1 Given that there were no objections to the installation of the blue badge holder parking bay, but rather to the potential displacement of the five existing cycle stands, all points raised by the objectors have been adequately resolved.
- 6.2 It is recommended that *TRO-11-2022* is approved and the five displaced cycle stands and four new cycle stands are installed as shown on the plan in Appendix 3.

## 7. Financial implications

- 7.1 The Traffic Regulation Order does not amend any paid for on-street parking and has no effect on the council's parking income.
- 7.2 The full cost of the Traffic Regulation Order process and its implementation will be funded by the developer.

Name of finance officer consulted: David Wilder  
Date consulted: (05/09/2023):

## **8. Legal implications**

- 8.1 The Council is bound by the provisions of the Road Traffic Regulation Act 1984 and associated Regulations in relation to the procedures for making traffic regulation orders. These include advertisement and consultation on proposals. The report sets out the consultation responses and officers' consideration of them, as required by legislation. Committee is asked whether it agrees with the conclusions drawn and recommendation provided, having taken into account the issues raised.

Name of lawyer consulted: Katie Kam      Date consulted (05/09/23):

## **9. Equalities implications**

- 9.1 The minor nature of these works does not require an Equalities Impact Assessment.
- 9.2 The TRO includes provision for a new blue badge holder parking bay directly adjacent to the entrance of the development.

## **10. Sustainability implications**

- 10.1 There are no direct sustainability implications from this TRO, however the development is providing additional cycle parking adjacent to the site, which will enable and encourage greater levels of active travel.

## **11. Other Implications**

### **Social Value and procurement implications**

- 11.1 There are none.

### **Crime & disorder implications:**

- 11.2 The additional cycle parking provided by the developer will facilitate secure cycle parking.

### **Public health implications:**

- 11.3 There are none.

## **Supporting Documentation**

### **1. Appendices**

1. Statement of Reasons
2. Existing and proposed sketches for Blue Badge holder parking bay

3. Lewes Road Cycle Stand locations (4003G) - proposed new locations for the 5 existing Caledonian Road cycle stands, plus 4 new cycle stands

**2. Background document**

1. Caledonian Road 10.7m Artic SPA (003) - Swept Path Analysis drawing of a 10.7m vehicle using the loading bay





### **Description and Measurements of Amendment**

To provide a blue badge holder parking bay adjacent to the entrance of 56 – 57 Lewes Road, Brighton, via Caledonian Road.

On the north side of Caledonian Road from a point 7m west of the junction with Lewes Road for a distance of 6m.

### **Statement of Reasons**

The reason this amendment to the relevant Traffic Regulation Order is necessary is to provide a blue badge holder parking bay in respect of planning permission BH2020/01696.

### **Supporting Narrative**

The conversion of 56 – 57 Lewes Road from food retail use to student accommodation and flexible retail/café use was approved by the City Council in March 2021. The supporting evidence, which has already been agreed by the Council as being appropriate and accurate, notes the need for a blue badge holder parking bay. The existing cycle parking facilities are to be relocated and the area vacated established as a blue badge holder parking bay. This supporting narrative is to set out the case for the minor amendment to the existing on-street parking controls.

The main entrance of the student accommodate element of the proposal is to be moved to Caledonian Road. The Local Highway Authority considered that it necessary to include a blue badge holder space adjacent to the new entrance for the benefit of prospective tenants, their guests, visitors, users of the retail/café space, and local residents.

The Loading/Unloading bay to the west of the proposed Blue Badge Holder Bay is unchanged by this amendment.



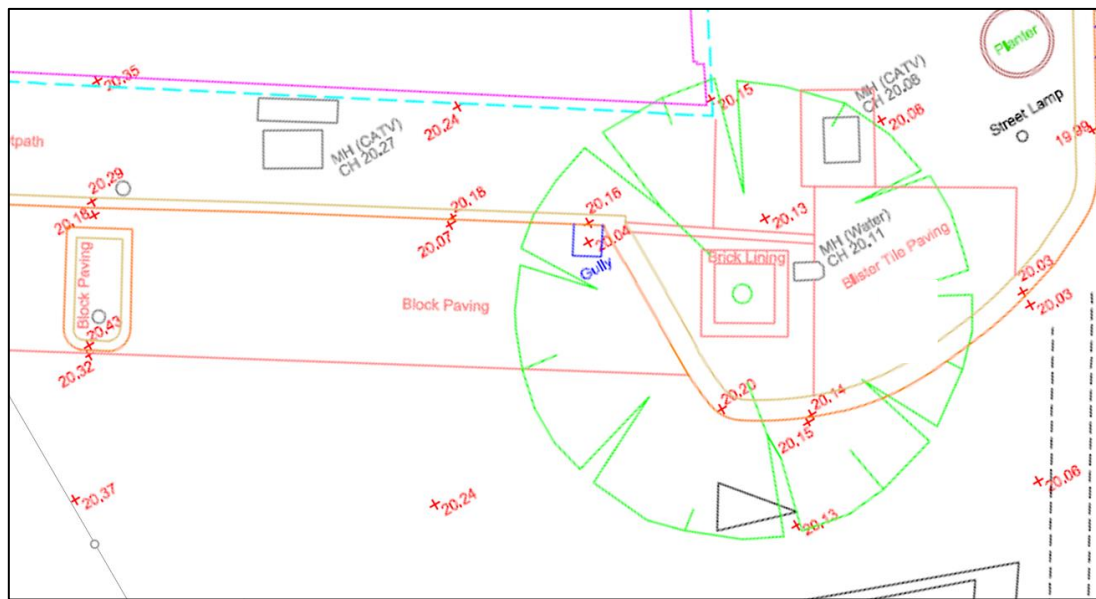


Figure 1: Existing Caledonian Road

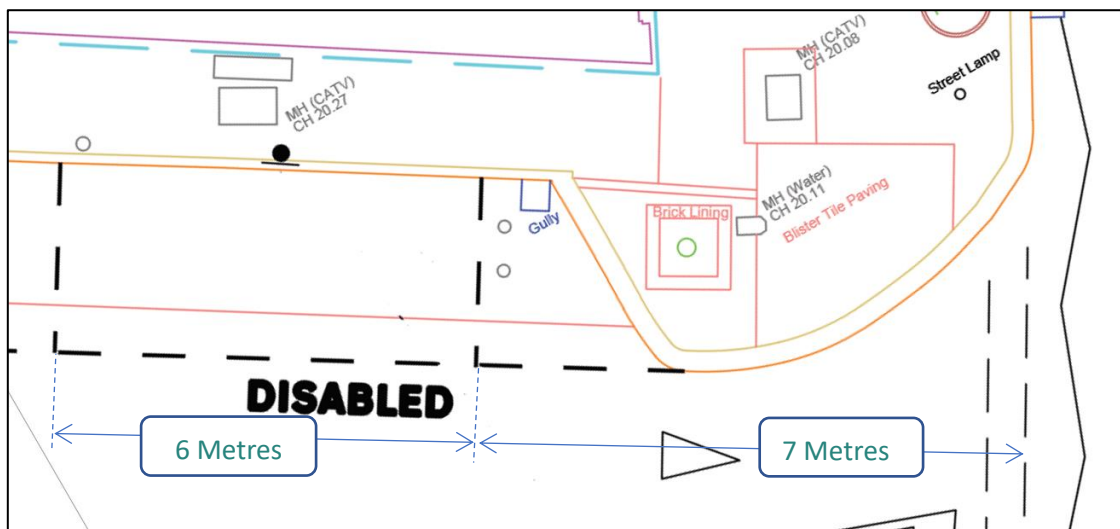
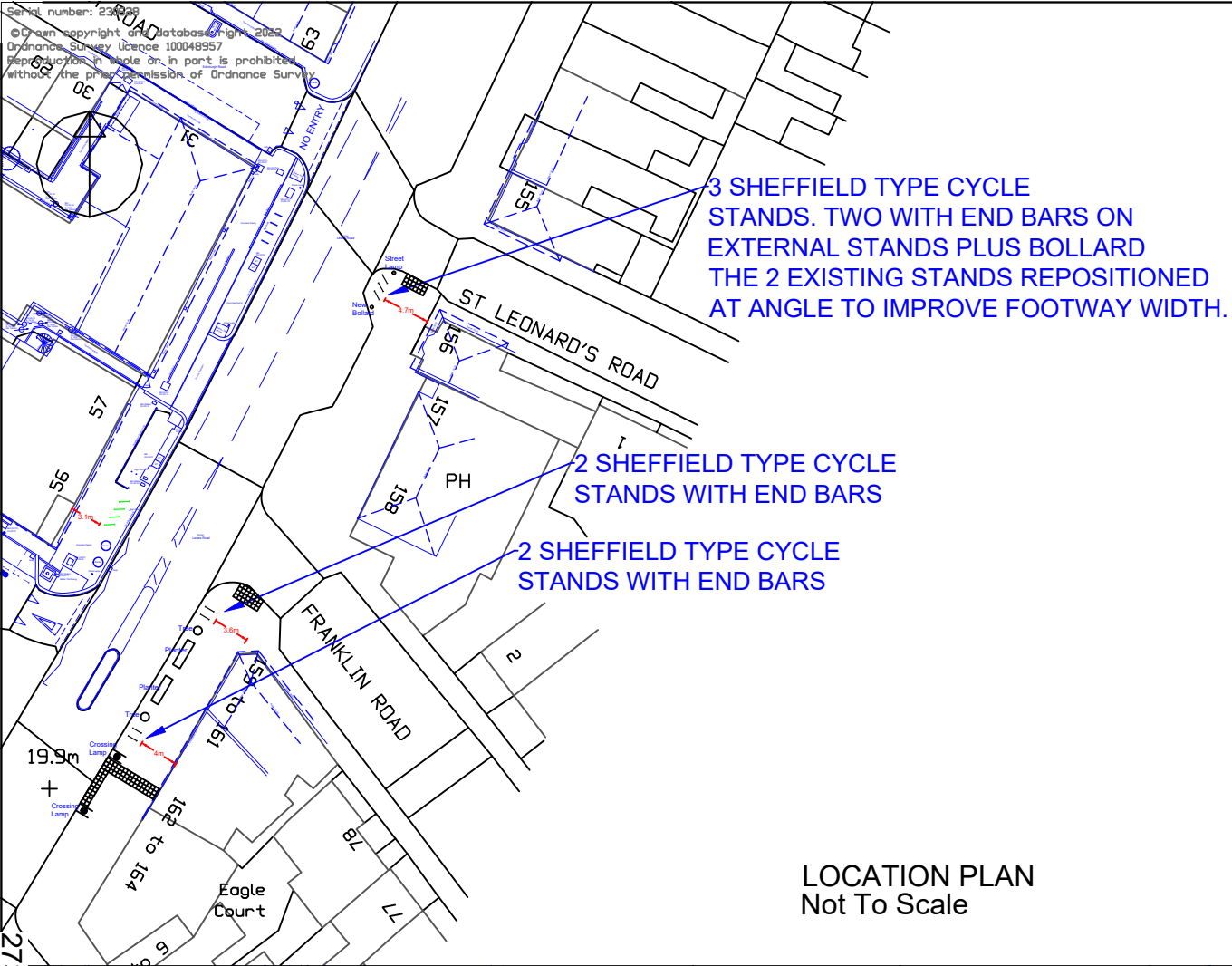


Figure 2: Proposed Caledonian Road



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# Brighton & Hove City Council

## Transport & Sustainability Committee

## Agenda Item 35

**Subject:** Gardner Street Traffic Regulation Order (TRO)

**Date of meeting:** 3<sup>rd</sup> October 2023

**Report of:** Executive Director Economy, Environment & Culture

**Contact Officer:** Name: Russell McMillan Tel: 01273 292387  
Email: russell.mcmillan@brighton-hove.gov.uk

**Ward(s) affected:** West Hill & North Laine

### For general release

#### 1. Purpose of the report and policy context

- 1.1 The report seeks committee approval for the making of two Traffic Regulation Orders (TRO's) the effect of which will be the closure of Gardner Street to all vehicles at set times between Fri - Sun & bank holidays, the introduction of a time limited disabled parking bay and to change the restriction on the loading bays so they can be used when the road is open to all vehicles, subject to amendment set out in paragraph 2.1 below.

#### 2. Recommendations

- 2.1 That Committee, having taken account of all duly made representations and comments, agrees that the TRO for Gardner Steet detailed below (and as amended by paragraph 6.1) is approved and proceeds to implementation stage.

- Brighton & Hove (Prohibition of Vehicles) (Gardner Street) Order 202\* (TRO-35a-2023)
- Brighton & Hove Various Controlled Parking Zones Consolidation Order 2018 Amendment Order No.\* 202\* (TRO-35b-2023)

- 2.2 It is also recommended that any requests for minor design amendments deemed appropriate by officers are added to the proposed scheme during implementation and advertised as an amendment Traffic Regulation Order on the basis that such minor design amendments do not constitute a substantial change to the orders as approved.

#### 3. Context and background information

- 3.1 In July 2020 as part of the Council response to Covid 19, Gardner Street was closed to all traffic (except cycles) 7 days a week using an Experimental

Traffic Regulation Order (ETRO). Previously the street had been closed at the weekend to all vehicles for over 10 years. During the ETRO changes it was highlighted that blue badge holder access was required and the ETRO was amended to allow blue badge holder only access.

- 3.2 In September 2021 the ETRO expired, and it became clear the road wasn't working well with the mixture of use from all road users. Delivery drivers were regularly entering the road during the restricted hours, blue badge holders were unclear if they could access the street and the disabled bays were obstructed with tables and chairs making the disabled bays inaccessible. The road reverted back to be closed during weekends and bank holidays only between 11am – 5pm.
- 3.3 In February 2022, following extensive stakeholder engagement with disability groups, businesses, residents, and active travel groups during October 2021, Council Officers met local businesses with Lead and Ward Councillors to discuss how the street could be closed to all vehicles (except cycles) to enable tables and chairs to be set out during the road closure. A new TRO was advertised to close the road to traffic for the hours of 11am – 5pm every day and to include relocation and creation of 9 additional disabled bays to nearby Regent Street to allow blue badge holders to access the local amenities. This was agreed at ETS Committee in November 2022, and came into force in January 2023.
- 3.4 During the consultation for the TRO, Officers and Councillors were made aware that closing the road could detrimentally impact disabled residents. These concerns were included in the report presented to the November 2022 ETS Committee (with specific details contained within a 'part 2 report'). Since the TRO has come into effect further issues relating to accessibility have been highlighted. These issues include not being able to access the relocated disabled parking bays in Regent Street and the restrictions having a profound impact on day to day life.
- 3.5 At the Transport & Sustainability Committee held on 6<sup>th</sup> July 23, the Gardner Street traders submitted a petition requesting a change to the current restrictions in place (11am – 5pm, everyday) and to allow more space for seating in the carriageway to support their businesses, as they can currently only utilise the footpath for table and chairs to ensure the carriageway is kept clear of obstructions, making it accessible for pedestrians, wheelchair users and cyclists (The council require a minimum 3m passing place for these road users).
- 3.6 The Council was therefore aware that the TRO as implemented required review. In late July 23 the Council undertook further engagement to look at possible solutions and find a mutually agreed adjustment for all interested parties.
- 3.7 The advertised proposed TRO has a statutory consultation process which enabled members of the public and stakeholders to comment on these proposals before any scheme is implemented.



- 3.8 Detailed plans and the proposed TROs were available to view online (Appendix A & B) and copies of these were sent to residents and business in Gardner Street to highlight the proposed changes.
- 3.9 The proposed TRO changes were supported by 61.9% of respondents. The changes also include the reintroduction of a time limited disabled parking bay in Gardner Street for blue badge holders to utilise outside the general hours of restriction, to enable relevant users to carry out their required day to day activities.
- 3.10 The closure of Gardner Street to all vehicles will create a pedestrianised shopping and leisure area in Gardner Street for pedestrians during the hours of operation (Fri – Sun and bank holidays) This will allow the businesses to expand tables and chairs into the carriageway to allow use of the outside space for covers, subject to licensing permissions.

### **Consideration of Issues Raised**

- 3.11 The Council received 549 items of correspondence to the proposals from residents, businesses, and stakeholders. This included support and objections to the proposals.
- 3.12 Of the 549 comments, 402 comments were received via a petition set up and advertised on the street. Objections were generated via a QR code scanned by the public which automatically generated an email to [parking.consultation@brighton-hove.gov.uk](mailto:parking.consultation@brighton-hove.gov.uk). The email comments received all stated the same thing:

*"I object to the reintroduction of driving and traffic on Gardner Street Monday to Sunday 11am to 5pm for the following reasons:*

- 1. Reduced safety for pedestrian access (visitors to the city assume that this is also a pedestrianised street like Kensington Gardens and Sydney Street).*
- 2. Reduced wheelchair and pushchair access to the pavements.*
- 3. Increased air and noise pollution to the detriment of residents, visitors and traders.*
- 4. Reduced pedestrian traffic to the detriment of the North Laine area and the city as a whole.*
- 5. Reduced cafe/bar and restaurant trading space to the detriment of tourism in the area."*

- 3.13 These comments have been noted and are highlighted to the committee, but the information provided to the public is considered to be incorrect. The objections state that the TRO proposes to reopen the street 11am - 5pm everyday to all vehicles which was not part of the proposals. The advertised QR code did not provide a link to the Council's TRO consultation page or advise on the correct content of the TRO. Those responding to the comments were therefore not given all the information required to make an informed decision. The proposed changes will support the businesses with their busiest periods (Fri-Sun and bank holidays) when the road will be

closed to vehicles, whilst supporting access requirements for residents during the week.

3.14 Detailed analysis of the additional individual 147 comments received has outlined that the proposals are generally supported, 91 comments in support, 54 comments object to the proposals, and 2 general comments received.

3.15 The main concerns raised were:

1. Businesses not being supported to install tables and chairs on street.
2. Access for blue badge holders was being restricted.
3. The current agreement wasn't supported by all businesses and residents.
4. Blue badge holders are unable to access local amenities due to lack of disabled bay provision in the street.
5. Loss of the community spirits due to recent TRO changes.

The main supportive comments were:

1. Enjoyed the car free street,
2. The street felt safer, more accessible and had less pollution.
3. Proposed changes are more supportive to all who use the street

3.16 Of the comments received, 22 highlighted concerns around the proposed 9pm closure. In response to these concerns, it is proposed to reduce the hours of restriction on the advertised TRO proposals from 11am – 9pm to 11am - 7pm. The comments highlight concerns around access to the road for its users and residents at a reasonable time in the evening, when many of the business close around 6pm. The 7pm amendment will allow time for the business who close earlier to ensure all apparatus are removed from the carriageway and ensure the road is ready to be reopened to vehicles at 7pm, this should support the requirements for both businesses and residents.

3.17 The comments and objections are listed in Appendix C to this report.

#### **4. Analysis and consideration of alternative options**

4.1 The main alternative would be not to approve the TRO for Gardner Street and leave the road with its current restrictions 11am – 5pm everyday. It is considered that this would not be commensurate with the consultation feedback, which is generally supportive of the proposals in the report.

4.2 Consideration has been given to keeping the current restrictions and allowing blue badge holder only access, however with the high demand for licensed tables and chairs to be installed in the carriageway, as well as documented issues with shared use from the previously implemented ETRO, this would not be a suitable solution for road users. In addition to this it would pose a high risk to pedestrian safety allowing a motor vehicle entry to a pedestrianised street where the general public are not expecting a vehicle to be entering the road during the closure.

## **5. Community engagement and consultation**

- 5.1 Meetings and discussions were held with lead Councilors, local businesses and residents to see what TRO changes were required and to take into account the complex needs and wishes of all parties.
- 5.2 Comments received to the TRO highlight a complex mixture of conflicting needs from both the businesses, blue badge holders and residents wanting to use and access the street for different reasons at the same time.

## **6. Conclusion**

- 6.1 After reviewing the comments and having taken into account the issues raised, it is recommended to proceed with the closure of Gardner Street to all vehicles; with an amendment of the proposed hours to 11am – 7pm, Fri – Sat & Bank holidays (except Christmas Day and Boxing Day), this will allow residents to access the street at a reasonable time in the evening and allow blue badge holders to park in the time limited bays to access the local venues such as the Komedia.
- 6.2 An additional time limited disabled bay at the southern end will also be introduced following comments received.
- 6.3 It is also recommended that any requests for minor design amendments deemed appropriate by officers are added to the proposed scheme during implementation and advertised as an amendment Traffic Regulation Order.
- 6.4 Due to staff holidays on Christmas and Boxing day the gate will not be closed and the road will remain open.

## **7. Financial implications**

- 7.1 The recommendation to approve the Traffic Regulation Orders would result in minor signage and road lining costs. The costs of these changes estimated at less than £0.005m would be funded by existing maintenance Budgets. Officer time associated with the TROs will be contained within existing budgets. Any significant variations to budget will be reported as part of the council's monthly budget monitoring process.

Name of finance officer consulted: John Lack    Date consulted 18/09/23

## **8. Legal implications**

- 8.1 The Council regulates traffic by means of orders made under the Road Traffic Regulation Act 1984. The procedure for making such orders is contained in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 which require public notice of proposed orders to be given and for the relevant documents to be placed on deposit for public inspection. Any person may object to the making of an order.

Amendments to a TRO from that advertised are permitted when the amendments are not 'substantial'. Consideration has been given to the impacts of the proposed change of 2 hours to the time of restriction, and the conclusion is that such impacts will not be substantial.

- 8.2 The Council's Constitution provides that decisions on TROs are made by this Committee where there are either six or more unresolved objections or the matter has been called in.

Name of lawyer consulted: Katie Kam

Date consulted: 20/09/2023

## **9. Equalities implications**

- 9.1 An Equality Impact Assessment was carried out for the TRO in this report and is attached in Appendix D. As part of the process feedback from businesses and residents was considered along with advice and guidance from the council's equality, diversity and inclusion team. The new TRO under consideration by committee is in response to the experiences of disabled residents and aims to ameliorate the negative impacts of the original TRO. Base on city-wide data no disproportionate impacts were identified for some cohorts of the population. A comprehensive set of actions has been identified in the assessment that will become part of the service continual improvement of embedding equality, diversity and inclusion in its operating practice.

## **10. Sustainability implications**

- 10.1 There are no sustainability implications

## **11. Other Implications**

### **Social Value and procurement implications**

- 11.1 There are no social value and procurement implications.

### **Crime & disorder implications:**

- 11.2 There are no crime and disorder implications.

### **Public health implications:**

- 11.3 There are no public health implications

## **Supporting Documentation**

### **1. Appendices**

1. Appendix A – TRO Notice
2. Appendix B – TRO Plan
3. Appendix C – TRO comments received.
4. Appendix D – Equalities Impact Assessment

# **BRIGHTON & HOVE CITY COUNCIL ROAD TRAFFIC REGULATION ACT 1984**

NOTICE is hereby given that Brighton & Hove City Council ("the Council") proposes to make the Orders named below under the relevant sections of the Road Traffic Regulation Act 1984 as amended which if they come into force will introduce various changes as detailed below:

## **Brighton & Hove (Prohibition of Vehicles) (Gardner Street) Order 202\* (TRO-35a-2023)**

- Revokes the Prohibition of Driving Monday to Sunday 11am to 5pm on Gardner Street and introduces a Prohibition of Vehicles Friday to Sunday (and bank holidays) 11am to 9pm

## **Brighton & Hove Various Controlled Parking Zones Consolidation Order 2018 Amendment Order No.\* 202\* (TRO-35b-2023)**

- Gardner Street – New disabled bay Monday to Thursday 3 hours maximum stay no return within 1 hour and makes the loading bay restricted to loading only Monday to Thursday at any time 30 minutes maximum stay no return within 1 hour.

A copy of this Notice, the proposed Orders, plans showing the lengths of road affected and a statement of the Council's reasons for proposing to make the Orders may be seen online at [www.brighton-hove.gov.uk/current-tros](http://www.brighton-hove.gov.uk/current-tros).

All objections and other representations relating to the proposed Orders must be made in writing and all objections must specify the grounds on which they are made and should be sent to the Executive Director Economy, Environment & Culture, Brighton & Hove City Council, Parking Design & Implementation, Room G40, Hove Town Hall, Norton Road Hove, BN3 3BQ quoting the TRO reference number shown above or by e-mail to [TROcomment@brighton-hove.gov.uk](mailto:TROcomment@brighton-hove.gov.uk) or online (see details above) no later than 1 September 2023. Please ensure you include your full name and address.

Dated: 11 August 2023  
Executive Director Economy, Environment & Culture  
Brighton & Hove City Council  
c/o Parking Design and Implementation  
G40 Hove Town Hall  
Norton Road  
Hove BN3 3BQ  
[www.brighton-hove.gov.uk/tro-proposals](http://www.brighton-hove.gov.uk/tro-proposals)

Appendix A





## Appendix B

Loading bay Mon - Thur - 30 mins  
( No return within 1 hour)

Proposed time ltd DPB - Mon - Thur  
3 hour (No return within 1hour



**Brighton & Hove  
City Council**

Gardner Street

Gardner Street -  
Pedestrian ZONE

## DRAWING STATUS

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Phase 2.dwg

SIZE:  
A3





Support or object	Outline comments received
Object	<p>I would like to start by thanking those of you who came and talked through the councils plans for our street. I am writing mainly because I felt I was un-able to properly express my thoughts on the subject, at the meeting. In previous emails I have tried to explain the socio economic benefits of a strong independent Gardner Street, how its decline would hit the whole city, and with hindsight I can see that there is little short term political advantage in any of that for you. At the same time it was unfair of me to expect you to think about the human affect of what you are doing to us and our families, if we have not explained them to you. Before I can get on with the urgent issues that have been overlooked I want to share how the meeting has affected me mentally. I should start by explaining that I am usually calm methodical and logical. I pride my self on my empathy I always try to see things from others perspective, it is rare that I am unable to put myself in someone else's shoes, even when I disagree with them. It is quite alien to me that others would not at least try to do the same, especially those in public office or employed to serve the community. I think this may in part be of why it has taken so long for me to calm down. I can not remember a time when I have been so angry at work, or a time I have taken this long to calm down. I have not slept since the meeting on Tuesday. It also hurts how you met with us the previous week, to gain information, not for the good of the city, but to use against us. I shouldn't be surprised, its hardly like this is the first time the council have stabbed us in the back. Why is it the independent businesses of Gardner street who are always at the bottom of the pecking order. It is the sheer injustice, and lack of thought that is so hard to take. It is important that you understand how your decisions affect others. I realise these things are not important to you, and why you would want the easiest, most obvious answer. This has been my home, my community, for almost half my life. I may have opened the business in 2005, but I moved into the area, and started working in the North Laine at the start of the century. I know everything and everyone around here. It is my life, I can't sit back and let it be destroyed. Until our family out grew the flat we lived above the shop. We loved living on the street, but there were sleepless nights from the pubs, and the club that opened after we had moved in (now a cinema), combined with early mornings when deliveries started to roll up. This was the nature of living in a vibrant commercial area, we never thought to complain, it was our choice, and we loved it. For at least 20 years traders on Gardner street have been campaigning for the streets pedestrianisation. There have been numerous unanimous or near unanimous petitions, it always felt that it would happen one day, and then like a phoenix from covid's flames we thought we had been given something back, only for it to be taken away. Then there was the hope of the Traffic Order, but before we could celebrate for the city the flawed details were announced, once again businesses would lose out. Although the traffic order was flawed very quickly the advantages of pedestrianisation became even more clear, the street was safer, and more accessible. Encouraging traffic back onto the street will almost certainly end in a fatality. Nearly every evening I see pedestrians unaware of traffic coming behind them almost being killed. Yesterday morning while the street was filled with people a woman drove at speed and almost hit a group of teenagers. Today I saw a near mis with a lady with headphones, this time on Bond Street, Nobody expects there to be cars, because there shouldn't be any cars. The general public will not understand why there is traffic some days, and not others, and only on one street. One of the great things this year has been seeing the ease with which wheelchairs and buggies have been able to get through the North Laine, and how many more we have seen. We had an elderly customer who explained that he used to be nervous when the pavements were crowded. My own brother is severely autistic, the crowded pavements were always hard for him, but now he is far more relaxed about visiting the shop, he often needs to 'pace' the sight of a crowded pavement, stopping him getting out of the shop would be very stressful. There is something very Orwellian about the equalities officer telling us that the needs of one disabled resident is so much more important than everyone else's disabilities, not to mention the 60 businesses hundreds of staff and the rest of the city. I am sure you will hear from many businesses about the financial affects of your proposed 'dangerous, ableist, car park', It is unfair of us to expect you to relate to what these affects mean in human terms.</p>

	<p>We are not just greedy corporations. Someone who works in a nine to five job, may not relate to the sacrifices small business owners put into achieving there dreams. We devote our whole lives, literally. There is never a moment when I am not thinking of the business, and the community. We miss large chunks of our kids childhoods. My kids have grown up in the shop, as much as they have in our home. My daughter recently made a wish, that she could spend a day with Mummy, and Daddy. One of us is always in the shop. I can't expect you to understand, when the wives and husbands of those who own their own businesses often find it hard to understand. I know so many marriages that have not survived, because one partner owns a shop. It's not that the business is the most important thing, but there is a point when you have drained so much blood, sweat, and tears there is no turning back. Believe me there have been many occasions over the last 18 years I have wanted to walk away, but I just can't. So when you see the organisations that are meant to help, they should know how to protect you, making decisions that could kill your businesses, your hopes, your dreams, your family, and the whole community it hurts. If you take this away from me, I doubt I would survive. We give so much to this city in every way, is it not time you gave us something back? The decision to bring back traffic to these streets feels personal, it feels unfair, and mean spirited, and it is certainly disproportionate. Before I beg you to reconsider I have a suggestion. Nobody will love it, but it would be functional, and avoid most of the excess harm of your proposal: We keep the streets clear of all street furniture Tuesday to Thursday each week, apart from school holidays, and the road is still closed to traffic, but can be accessed by blue badge holders. We could literally just close the gates, but not lock them and blue badge holders can stop and open them, if they need access. I am sure this ticks all the boxes, it is disproportionately beneficial for our neighbour. While avoiding all the dangers, the ableism and the majority of damage that re-opening the road would bring. Businesses will still lose considerable income, but not so much that they would be pushed into insolvency, avoiding the repercussions on the rest of the city. Finally, I would like to reach out to our neighbour opposite. We have always been very close to her, we still feel close to her, although recently she has distanced herself from us. It was not long ago, back when were were able to sell cakes in the street, that she would come to her window, we would chat on the phone, she would point out the cake that she wanted. She seemed happy, when the street was more vibrant. She seemed happy looking at the happy people going about their business bellow. We miss her. When she came out and got into the awaiting car, that morning, we rushed over to congratulate her, we cheered, my wife shed a tear. Who knew that happy moment would create such a change in her. She is still a friend, and I will never let anyone say anything bad about her, I care so much about her, but this situation clearly needs compromise. That compromise needs to be two way. For 18 years I have nicely, calmly respectfully campaigned for the pedestrianisation of Gardner street, I have signed petitions, I've sent hundreds of emails. It should not be this hard to point out what is so clearly better for the city. Being nice, being calm, being reasonable has only resulted in us being ignored. I hope that you can see we are people, we have families, and we do actually matter. I will use all legal means to stop you destroying this street. Do not open the street to traffic. There is no good that can come from it, I have already sought legal advice.</p>
Object	<p>I have heard about your plans to encourage traffic back onto Gardner Street during specific days each week. I urge you to reconsider these plans. While I am sure you are aware of how damaging this will be for our city's independent businesses, it would appear you don't realise how important those businesses are for the whole city. It is the independent businesses in the Lanes and North Laine, that differentiates the city from the rest of the world. More than anything it is those businesses that attract tourists to the city. If those tourists don't feel safe then they will soon stop coming, and with crowded pavements and traffic-filled streets, Gardner street will not feel safe, we are not talking about a wide boulevard with spacious pavements. If you had ever been to the North Laine you would see not only tourists but most locals rightly assume that the street is pedestrianised, they often walk out onto the street, this will result in a fatality, blood will be on your hands. This year disabled and the visually</p>

	<p>impaired have been able to freely navigate an area that was too busy and hazardous prior to the traffic order. I fail to understand why the council wishes to deter these visitors to the city, divide the North Laine, and risk lives. There are so many benefits to the pedestrianisation of Gardner streets, and no benefits to making it another traffic filled cut through. I understand there is a disabled lady who has been very vocal with her complaints. Damaging the entire city, rather than finding a solution that assists her seems incredibly lazy. Unless this is just a new council wanting to undo all the best work of the previous council. Please Please Please do not destroy the North Laine. Streets all over the country manage to pedestrianise areas of their city centres, Gardner street really lends itself to being traffic free, please dont tell me all those other cities can mange it, but its beyond Brghton City Councils capabilities. How embarrassing.</p>
Object	<p>1, Safer for children, 2, better for the environment 3, reduces reliance on cars 4, businesses have worked hard for compromise with resident on street</p>
Object	<p>I strongly object to the proposed change of prohibition of vehicles in Gardner street. The reasons that are obvious to keep the road closed as much as possible are: 1. A much improved North Laine for pedestrians. Gardner street is a main thoroughfare for tourists who are here to enjoy our city without traffic. 2. Less vehicle pollution. 3. Raising the profile and prosperity of our city and helping the independent retailers that draws so many of our visitors. 4. Stopping it going back to the car park that the loading bay had become for years. Promises of parking enforcement have never come to anything in the past. Without a closure Gardner street becomes a dangerous congested cut through from North Road to Church street. Over the past few months it is clear that a closure works very well for everyone. There has been no instance of anybody suffering from its closure. I have been working in the street for over thirty years and prohibiting traffic has been a massive boost for us all here and the entire North Laine. The bigger picture for everyone is to keep it closed as it is now and let Brighton be Brighton.</p>
Object	<p>firstly just make your minds up. you literally done this 5 times now, flip flopping between pedestrianised and open, it's frustrating. my business isnt even one of the ones with outdoor seating but seen a huge increase in sales since the 7 days pedestrianisation. now you are taking it away in the week again and taking money out of our pockets. dread to think how much of our council tax you waste on this nonsense. make a decision and stick to it. absolutely clueless</p>

Object	<p>Apart from the addition few hours closed on a Friday, this is a regressive and perverse move. I am disabled and I have many local friends of all manner of physical and mental difficulties. Narrow pavements, busy roads, cars, lorries, and parked vehicles all add to difficulties using public highways, especially, on narrow roads. 1 disabled resident who has stairs to reach their flat won't travel the short distance to the end of the road to use their car. They would would much rather privilege themselves at the great physical and mental inconvenience of keeping the road open for the sake of being able to park outside one's front door. A few privileged disabled people who want privileges rather than lifting up all disabled and other vulnerable people using the road. How does the person manage when out of a car? They can't park inside buildings, or directly outside wherever they need to go. Is the government not providing appropriate equipment, or sufficient funding to be able to access moving around without a car? I don't believe it the disabled resident cannot access their car adequately at the end of the road's parking spaces. I had unproductive conversations with anti-pedestrianisation, [REDACTED] I believe this issue is being mis-used to roll-back disabled-friendly spaces to privilege car drivers. The disabilityt is just cover in this case. This is sad, because [REDACTED] who have been very helpful tome in the past with my disabilities, are now actively prioritising a privileged few at the expense of the vast majority disabled and vulnerabled highway users, who also cannot afford, or cannot drive, or don't want to. Disabled people need more space in order to actively travel, and the space to be safe and secure. Pedestrianised roads, and wide segregated cycle lanes give space, security and time to traverse the highways. If the disabled resident really needs a disabled parking space soclose to their front door, and there really is no other appropriate option, then could be given a pass to access the road during closure. The partial closure was only a small advance to a much wider people-friendly plan in the North Laine, but ow even this is rolling back, and the samer tactics will be deployed by the anti-people, pro-car lobby again and again. This measure will make mine and my friends' lives considerably worse for the sake of selfish drivers. I urge you to strongly re-think, and plan advances in future, not regressions.</p>
Object	Should be permantly closed to motor vehicles in shop opeing hours to benefit pedestrians
Object	<p>I object to this proposal because it will be extremely damaging to my business and others on Gardner Street. At The Deli we have very little indoor seating so having seats in the road is a massive boost to our daily revenue. Without them we will lose out massively and I don't think this is fair. Also it looks like we won't be able to use the pavement for seating under this new proposal which will be catastrophic for our business. Since COVID, small hospitality businesses like ours have really struggled and I find it ludicrous that the council is deliberately putting up barriers that will continue to make us struggle. Small businesses like ours are what makes the North Laine an interesting and unique destination for people to visit and I'm shocked that in 2023 in a city centre our council are favoring motorists. The death of the UK high street is well underway in many cities all over the UK, how about supporting businesses or we will face many unnecessary closures in the coming months. The constant changing of rules is also not helpful. We have just spent</p>

	hundreds of pounds on new outdoor dining furniture which will be obsolete if your proposal goes ahead. Please support local businesses and don't allow this proposal to go ahead.
Object	The opening of a road to motorised and in particular fossil fuel burning traffic is a crime against our children. The world is burning and we need to reduce emissions not increase them. We need to restrict traffic not increase it! The disabled access argument is ridiculous and a smokescreen for pandering to the motoring lobby. Reminds me of anti-gun control arguments in the U.S. If a disabled person is able to get from their property to a car then they can surely get to it if its parked a street away. Disabled people need to reduce their co2 emissions as well. There are plenty of manual and electric disability aids available. The public are strongly in favour of tough anti-climate change strategies such as reduction of motorised transport. Why do politicians (of all colours) only listen to the shouting of that minority who refuse to curtail their - literally - planet destroying behaviour!
Object	The city should be reducing the amount of rat running through our narrow streets, not encouraging it! There is zero need for through traffic through the majority of the North Laine. We should be pedestrianising more streets to make for a safer environment for everybody (both physically as well as pollution-wise), especially given how narrow the pavements and roads are for the amount of pedestrians we thankfully have in our wonderful city. You simply cannot live in a major city centre in Victorian/Regency housing and expect to have convenient car access. Widening pavements to make them more wheelchair friendly is a much more sustainable way forward.
Object	I object to the proposal on the grounds of public safety, disabled access. Both will be worsened with traffic having access to Gardner Street during the week.

Object	<p>As a senior citizen who walks down Gardner Street on a regular basis, the current daytime closure of the street has been of great benefit as the pavements are narrow and usually very busy even during the week. Although I am not personally disabled, I would imagine this will cause more rather than fewer problems for wheelchair users. I presume it will also impinge on the air quality of the street and the ability of businesses to have outside seating if they are not to block pedestrians. Traffic levels are already sometimes higher than desirable in both Church Street and North Road and I am concerned how this could also affect Gardner Street, especially at the North end. I do believe that this deserves a full consultation before going ahead.</p>
Object	<p>I love walking through the laines when there are no cars. The streets are full of people, strolling, eating, sitting, and relaxing. The air is cleaner, its quieter, it's a space for people to enjoy. The laines are one of the main attractions of the city, they are very busy and the pavements are very narrow. Allowing traffic through the laines is completely unnecessary and only serves a tiny minority who could take alternative routes or alternative transportation. As a democracy if you compare the number of residents who own cars and choose to drive into the city centre against and the number of visitors who come on foot, by public transport or bike surely you have to side with the majority? Why does every single section of the city have to be accessible by cars? Take a look at any great European city and you will find whole sections pedestrianized where communities can enjoy it without vehicles forcing their noisy, dirty, dangerous way through. We are in a climate crisis and caving to a small but loud and powerful car lobby is a terrible backward step. We need to be ambitious, courageous, and forward thinking.</p>

Object	<p>The closure of Gardner street to traffic provides a more enjoyable, pleasant and healthier environment to enjoy the Laines for myself and I think other residents and visitors. To reopen the road seems a backward step that would harm enjoyment of the area and local businesses who're able to use the road for seating and means people stay longer on the street. Whilst I'm sympathetic to the needs of disabled people I believe making this change to meet the needs of one person is not proportionate to the needs and benefits I've outlined above. Other solutions need to be explored for the person. Even if they moved in before traffic was stopped on Gardner street they will have known to great limitations to park everybody experiences and potential difficulties with access and moving round the area. Opening Gardner St to traffic again is a retrograde step and I hope it will be reconsidered by BHCC.</p>
Object	<p>The proposals reduce the total number and total hours that access to the street is restricted for motor vehicles but still leave three days of restrictions and for an increased number of hours. If disability access is the key issue here then why not regulate table placement to allow the popular outside table service to continue daily while restoring daily access to Gardner Street residents and/or those with disability badges? The cafe owners can be given designated street space for their seating and this will allow others to pass along the street more easily than is currently the case. Regulated shared use of an improved surface (as in New Road) and limited vehicular access surely beats a return to conflict between motor vehicle users and pedestrians?</p>

Object	<p>I strongly object to the proposed order as it will ruin one of the most important public spaces in the City. I understand that someone with a disability who lives on the street has complained but their right for a car to transport them to and from their home between 9 a.m. and 5 p.m. Monday to Thursday needs to be balanced against the rights of everyone else, including the thousands of tourists, to walk or enjoy sitting down in a café without being hounded out by cars. There is no automatic right for someone with a disability to expect the road they live on to be open to traffic. The Council can decide to bar personal cars etc from any road in the city based on the wishes of all of the users of it. There is pitifully little pedestrianisation in Brighton &amp; Hove compared to other cities in the UK and in Europe. It's against those cities that we are competing for people to visit and enjoy the best that the city has to offer including the North Laine. In the 2023 Labour Party Manifesto it says: "We will explore the merits of a car-free city centre" and "Labour don't just talk the talk - we walk the walk." If one of the first acts of the new administration is to re-open Gardner Street to traffic it will make Labour's commitment to a 'net-zero city by 2030' sound like just more greenwash.</p>
Object	<p>I object to the re-opening to traffic of Gardner Street. This will increase pollution and traffic and will harm trade in the street.</p>



Object	<p>I wish to withdraw my previous reasons/statement provided on the 14th August and replace it with the following: I object to the proposed order as it will ruin one of the most important public spaces in the City. There are two issues here which need to be balanced. One is disabled access and the needs of those entitled to a blue badge for a car to leave and return to the street when needed. The other issue is the right to fresh air for all and a safe environment free from the noise and pollution of cars. An environment where it is safe and there is a reduced risk of asthma from the pollution associated with cars. Much of central Brighton has poor air quality associated with vehicle use so we need to reduce personal car use and encourage active travel alternatives. I believe that opening the street to all traffic puts the balance in the wrong place and that closing it between 12 noon and 5 p.m. seven days a week would strike a better balance. When the street is open it should have restricted access i.e. delivery vehicles at specific times of the day (early morning or for an hour in the evenings) and blue badge holders only at other times. There is pitifully little pedestrianisation in Brighton &amp; Hove compared to other cities in the UK and in Europe. It's against those cities that we are competing for people to visit and enjoy the best that the city has to offer including the North Laine. In the 2023 Labour Party Manifesto it says: "We will explore the merits of a car-free city centre" and "Labour don't just talk the talk - we walk the walk." If one of the first acts of the new administration is to re-open Gardner Street to traffic it will make Labour's commitment to a 'net-zero city by 2030' sound like greenwash.</p>
Object	<p>Gardner street should remain pedestrianised during business hours. It makes the street much better for pedestrians &amp; businesses alike. It makes a huge difference to the accessibility and enjoyment for visitors. Businesses that must be struggling since Brexit &amp; Covid will be able to put tables &amp; chairs out and make the most of their space and the high rents &amp; rates they pay in the city centre. Allowing more businesses to remain open and not go out of business.</p>

Object	<p>s a blue badge holder with various mobility issues Gardner Street and immediate surround has become a no go area for many of us. Whilst I am pleased amendments to the last TRO are being considered I believe 1) 2 disabled bays are essential. These bays must be clearly marked and enforced. Reopening at 19h would make evenings in this vibrant area more accessible for us. Opening the street on Christmas and Boxing Day would also mean that we could experience the area at its most decorative, whilst most shops would be closed many cafes and restaurants remain open. It is also VITAL that the pavements are kept clear to allow access to those using wheelchairs and using mobility aids, plus no blocking of dropped kerbs. Without these measures in place we are feeling unheard and certainly not included as part of our City.</p>
Object	<p>This is a major reduction in a core North Laines shopping street. Today (a Tuesday) it was packed, due to the pleasant &amp; safe ambience: many tables out, street sellers etc. This benefits the local economy. This review is NOT balancing such considerations with the "needs" of one disabled resident; a solution for her must be possible. Of course accessibility is important, but a reasonable offer, whilst not being her ideal, should enable the existing level of pedestrianisation to benefit the vast majority.</p>
Support	<p>I support the TRO if the following additions are made: - at least 2 disabled bays - a drop off/pick up along the street for when it's open and at either end for the Fri-Sun closed days -reopening at 7pm so that disabled people can go out in the evenings too! - open on Christmas and Boxing Day - there is a clear commitment to enforcement of the disabled bays to prevent abuse and of the pavements to keep them clear - make safe and improve the dropped kerbs which are currently dangerous and often obstructed</p>

Object	<p>The closure of Gardner street has made shopping and eating in the area a much more pleasant experience. The pavements are very narrow and due to the number of people all week, it was difficult to stay on the pavement when cars were allowed. When I had young children and a buggy it was a dreadful street to walk down when cars were allowed - always worried that my young children were going to get hit by cars as they were so close to the road, always dodging people and apologising as people had to move into the road past the buggy. I can't believe that anybody would think it was a good idea to open up this road again. The lack of cars gives the road a feel as if it is in a city that actually cares about people and not just car drivers. People walk slower, browse shops more, plus the added tables for the cafes means that profit is higher. I can imagine it will be difficult for the cafes to survive when over half their tables disappear for most of the week. You should close more roads like this, not open them up.</p>
Support	I am a disabled person I find Gardner street inaccessible. For both road and path
Object	Not a lot of choices for disabled people
Object	I don't know how the cafes in the street will survive without being able to seat people outside. I love the atmosphere of the pedestrianised street.

Support	<p>I support this proposal as I support disabled people's rights to have access to the community. The way the road currently is has made it very difficult, if not impossible, for disabled people to use - there are things scattered all over both the road and pavement, dropped curbs are often blocked and they are steep and oddly shaped making them incredibly awkward to use, if they can be used at all. The proposal is not a perfect solution, as it only gives disabled people clear access during less social times of the week, but it is currently a fair compromise as long as pavements are clear and accessible with no businesses blocking dropped curbs (both when the road is open and closed), and there being adequate space on either end of the street as a drop off point for ease of access to Gardner Street for those who need it during times when the road is closed. There also needs to be exceptions and protocols for if emergency vehicles are needed on the street when it is closed, and more than one blue badge space available. It would also seem that businesses need road access as they often have vans and cars on the road after the gate is closed for things such as deliveries, painting and decorating, shop re-fittings etc, so it would be beneficial to have the road open so they can do these things legally. Extended hours on the weekend are also beneficial to businesses, as this is a busier time.</p>
Object	I think it will be bad for the businesses and cafes on Gardener Street

Object	<p>The reintroduction of traffic during the day along Gardner Street is a regressive step. Without traffic the street is a vibrant pedestrian zone where people can enjoy the shops, restaurants and cafes without fear of injury from motorised traffic, noise and exhaust fumes. The re-introduction of motor traffic - for the sole purpose of convenicing a very small minority of disabled drivers - has the balance all wrong. This is a move in very much the wrong direction. You will hear a lot of passionate voices on both sides of the divide, but I would urge you to look at the evidence before making decisions. Having recently visited Montreal and seen first-hand the hugely positive difference their Pedestrian Streets initiative has brought to the city where implemented - <a href="https://montreal.ca/en/topics/pedestrian-streets">https://montreal.ca/en/topics/pedestrian-streets</a> - please pay attention to the large volumes of evidence that exist there for the positive impacts bold pedestrianisation moves have brought to the city. Schemes such as the full pedestrianisation of the Avenue du Mont-Royal (<a href="https://montreal.ca/lieux/avenue-du-mont-royal">https://montreal.ca/lieux/avenue-du-mont-royal</a>) - despite initially exactly the same complaints you will hear here, have proved hugely positive for all: businesses have benefited from improved footfall; citizens and visitors have benefited from being able to enjoy the space safely; the city has become more human centred. I understand the competing priorities you are trying to balance here, but cities like Brighton should be leading the way on what can be done to improve our urban environments for all. Increasingly the evidence from cities all over the world that have returned streets once dominated by cars to pedestrian and cycle use, is that they are better, more inclusive spaces for people to enjoy that bring economic prosperity and physical and mental health benefits. If disabled parking is the driver here, then make more space available on nearby Tichbourn St, North Road, Church St or Regent St. Don't trash a whole pedestrian street for this.</p>
Object	<p>My objection is to the opening to traffic all day Monday to Thursday, this is a backward step for the following reasons:- This measure will handicap the businesses in Gardner Street that use the roadway to provide additional seating and give a European street effect. It is already difficult for these businesses to run viable businesses due to the disproportionately high rents in this area, these changes will increase those difficulties. If enacted this TRO will cause businesses to use pavements to site tables, chairs and stalls, making it an obstacle course for the disabled, elderly with mobility restrictions and parents with small children in buggies. Due to the restriction of space on pavements pedestrians will be forced in to the roadway, placing them in danger from traffic. During the daytime Monday to Friday the street will become a rat run, especially for taxis and minicabs. The junction with Church Street will become extremely dangerous for pedestrians and vehicles.</p>

Support

I'm writing to say that I approve TRO-35a-2023 and TRO-35b-2023 for Gardner Street. I think this is an improvement on the restrictions currently in place. I think it is a good move to reinstate one of the blue badge bays on Gardner Street, although replacing both would be better, as would including some drop-off points at either end of Gardner Street. We should surely be working to include all people with disabilities, wheelchair or mobility aid users at the centre of our community, rather than marginalising them by restricting access in this way to 'off-peak' times. This is not best practice in terms of disability and diversity inclusion. I have a friend who had a young son with disabilities. Her family used to live on the outskirts of Brighton and she said the disabled parking bays in the centre of town were a life-saver and crucial to being able to do things with her son in town. Taking away such facilities has a massive negative impact on the people who need and use them. I have another friend who currently lives on Gardner Street. They have mobility issues and require vehicle access outside their door to be able to leave their residence. The restrictions at the moment impose a curfew on them, which is totally unacceptable. TRO-35a-2023 and TRO-35b-2023 for Gardner Street is an improvement, but I question what would happen if my friend needed to leave their flat in an emergency at the weekend, or was required to attend a medical appointment on a Friday, for example? It seems discriminatory that their free movement is being restricted in this way. At the very least, couldn't the closure of Gardner Street end at 7.00pm rather than 9.00pm? I am commenting on TRO-35a-2023 and TRO-35b-2023 for Gardner Street, but I think my arguments apply to the whole of Brighton and Hove - we should be actively working to make the whole city more inclusive and accessible for disabled people.

Support	<p>Whilst the council have tried to bend to the wishes of the commercial interests in the area they have done so at the cost of those with disabilities. The council's WWW site says "We have disabled bays so Blue Badge holders can park close to their destination." This objective has taken low priority in the Gardner Street scheme. I support the reopening of the road Mon-Thurs as a valid attempt to bring a balance between commercial interest and the needs of the disabled. However the 9.00 pm reopening at weekends treats the disabled as second class citizens and is almost like the council saying "You are disabled, you should be home by then". The reopening time needs to be earlier. There needs to be disabled bays on the road for when it is open and when it is closed there must be some drop off facilities at either end. I recognise the council has a difficult balancing act between all the interestd parties, but the current proposals adversely affect the disabled citizens.</p>
Support	<p>I support the revision of the TRO, as I am aware of the extreme importance of vehicle access for disabled individuals and residents. It would be ideal if the road could be open to vehicles on the weekend also, but this appears to be a reasonable compromise. I would also propose that the blue badge spaces on Gardner Street be reinstated, and that there be allocated drop-off points at the end of the road for on weekends. Further, the current drop kerbs and suggested increased access for disabled people does not appear to be respected whatsoever by businesses - blocking the drop kerb with chairs/rails etc. I feel it is abhorrent for business to be prioritised over the welfare and access of disabled individuals to the extent that the current TRO allows. I am also aware that there is a disabled resident trapped in their own home due to this TRO - this needs to end. There is no moral justification for this.</p>

Support	<p>I support this proposal as it gives back some sort of disabled access to the street and on the caveat that the improvements suggested here. I would also like to see the further improvements/ amendments to be part of the decision: a) Resoration of both blue badge bays so easy access to both ends of the street. b) The closure Friday to Sunday to finish at 7PM. the proposed 9pm seems excessive as most of the premises will be long closed by then and effectively it would be too late for blue badge access to enjoy an evening out. c) Open Christmas Day and Boxing Day this seems logical as nearly all premises are shut. d) General improvement of dropped kerbs and better moitoring and enforcement of street furniture on closure days. I feel it also important to note that Gardner Street has never has an accident when the street was open or when we had the temporary covid closure and blue badge users had access.</p>
Object	<p>I reject the proposal because I believe Gardner street should be closed off to vehicle traffic on ALL days of the week. As a long term resident of North Laine, the cars and taxis driving its streets are a nuisance and a danger, disturbing the peace, forcing people to move out of the way by honking and shouting, and using up precious space. Additionally, I love the small businesses lining Gardner street and want to see them succeed. Allowing extra seating and display space would benefit both us consumers and these businesses. The positive impact would be enormous, allowing Gardner street to flourish, much like Sydney street.</p>



Object	<p>I strongly oppose the revoking of the current prohibition in regards to allowing private vehicles on the street and urge the council to permanently prohibit all private vehicles. This is presented as an entirely false choice between allowing everyone's private vehicle in Gardner Street and quite rightly providing provisions to disabled residents. Any provisions needed for residents is fully achievable without such anti-people restrictions needlessly tacked on. What the council is seriously suggesting is they require most of the space of the street to be hoarded by passing private vehicles, saturated in pollution and overwhelmed by vehicle noise. That the businesses on one of Brighton's oldest, densest and busiest streets cannot have all day, every day access to vital retail and community space. That pedestrians must be constantly on high alert for cars (including parents of small children, people with different mobility needs and all other vulnerable street users), that injuries and fatalities caused by vehicle traffic, pollution and loss of community space should be tolerated ('Local Transport Plan', 2015: 142 people were injured and 3 people lost their lives in road accidents in 2013). If this is what you have to sacrifice for your solution, then this is no solution that works for anyone and never will, least of all in this specific case. The vast overwhelming majority of inner city residents do not own a private car ('Car Free City Centre and Ultra Low Emissions Zone: Initial Options Study' 2020, Final Report &amp; 'Local Transport Plan', 2015 nearly twice as many of us walk to work than the rest of the UK). This forces us to ask: why should all residents, businesses and the community have to suffer all the harm that private vehicles cause? Inducing the demand for private cars on Gardner Street will just invite more vehicles and will choke it. The best solution is any disabled resident gets exclusive use of that space, not absolutely everyone with a private vehicle. It's highly concerning that council would even suggest reintroducing the most dangerous and inefficient form of transport to mix with (according to the highway code) all of the most vulnerable users of public space. Induce demand for people by allowing businesses and residents to use the space, making it a safe, inviting and vibrant community. It's 2023 we cannot be debating allowing private vehicles in dense urban communities. There are no excuses anymore, study after study has shown making streets for people works (see Brighton &amp; Hove's own study on New Road: 'The Social and Emotional Benefits of Good Street Design' by Jim Mayor &amp; Benjamin Coleman). While cities like Delft, Paris, Barcelona, Brussels, London and other UK town centres continue down the right path, we are charging in the wrong direction by even suggesting reintroducing all private vehicles in this consultation. No solution involves allowing every private vehicles back into Gardner Street, it undermines every single way we measure a street's success and the residents need it to be a success. It's entirely possible and necessary to provide provisions that work for disabled residents, people with different mobility needs, businesses and the community. It's very worrying to see two completely separate issues even being compared, when in fact car free streets and provisions for residents are two pieces of the same puzzle for better and liveable streets for all.</p>
Object	<p>The current TRO provides a pleasant ambiance during the week with great opportunities for outdoor dining that would be negatively impacted through revoking this TRO.</p>

Object	This proposal seems disproportionate. This proposal isn't good for business, and will increase air pollution. This will take the city further away from being car free and a more pleasant place to be for people who live here.
Support	I approve the changes to the subject lined TRO. I have good friends that have been affected by this decision and also have experience of working as a disability PA, seein firsthand the difficulties such changes can have. I believe that the city should be inclusive and accessible to ALL residents. I believe that, although the proposed changes are an improvement, there are still some considerations and further changes that should be made. Why is the opening restricted to Monday - Thursday? Access for all should be a given at all times of day and this should be enabled with the use of blue badge bays throughout the week. The street should be safe and accessible to all residents, currently navigating the street is difficult with many obstacles in the way from trader stands - these provide hazardous obstacles to navigate. I am glad that the press has been focussing on this issue and ensuring that disabled residents voices are heard, I hope that more changes will be made to the TRO to improve accessibility for disabled residents and visitors to the street. I'd like to be kept updated on the process of the TRO and hope that measures will be put in place to ensure one of the key streets in Brighton is a space for ALL residents of Brighton to enjoy and access.
Object	The city is choked with traffic everywhere. This rare, traffic free space is wonderful for tourists residents and local businesses. Reverting this positive change would be on direct contradiction to the number one recommendation of the Climate Assembly, a traffic free city centre. Please keep Gardener Street Traffic free

Object	<p>I write as a blue badge holding wheelchair user. I welcome the proposal to reopen access to Gardner Street Mon-Thursday. I object to not being able to access this area Friday-Sunday (and Bank Holidays). I like to visit this area when in town, but find disabled parking and access on the street near impossible. I recognise that traders need to make a living, but feel that it is becoming impossible for disabled people to access some areas of the city - of which this is just one. If I lived on this street I would not be able to access my own home. There are at present 2 disabled parking bays in this road at either end of it. I would like these to be clearly marked out and to stay - and ideally for greater provision to be made. The road needs to be reopened much earlier than 9pm if it is to allow evening access for all to this area of the city. Under these proposals my evening out could not start until this time which does not allow me to get to the theatre, concerts etc.</p>
Object	<p>Disabled people would be unable to access the road properly if it was shut at any time. Gardener street provides parking and a suitable throughway for disabled people. Disabled people still need to go places on Fridays, weekends, evenings, and Bank Holidays. Closure at any time suggests this is not the case. Currently traders obstruct the path and road. If there are different rules at different times I believe this will worsen things rather than if traders had mapped out areas they could put things. The general public is responsible for policing how the street is used currently as there is not proper trader support on what they can put and where and there is not suitable rent control and council tax reductions for small businesses/businesses run by residents. Sydney Street has similar rules and wheelchair users and pushchairs are forced onto the road which is painful to travel on. The pathway is flatter and more suitable and should be prioritised for pedestrians.</p>

Object	<p>North Laine is the heart of our independent shopping area. Gardener Street arguably at its heart. The pedestrianisation of the street had a wonderful impact on traffic noises, making space for citizens and visitors, rather than cars. I strongly support more pedestrian areas in our city, not fewer! We need to work towards a walkable, and bicycle friendly city, giving space to people, not cars. A full opening of gardener street during the week cannot be the solution! An alternative should be to resurface the road, making it pedestrian friendly with low curbs, street plants and bicycle friendly infrastructure. It should only be opened to vehicular traffic for delivery and loading in the early mornings and late evenings.</p>
Support	<p>I think it is important to have some access to this road particularly for anyone who is disabled or older living on the road that might not be able to walk far. I am also for there being some blue badge spaces to support people that need them and think it would be discrimination to not have them as you are making access to and from the road impossible for some people. I think some consideration for Fri-Sun too would be ideal, some way to help people access their homes and the shops on the road if they are not able to walk or use a wheelchair. People will want to go in and out of the street at weekends so perhaps the timings could be shorter e.g. 12pm - 6pm (when shopping is at its busiest) and maybe limit to summer time when we know Brighton is busier. I also think some provision for deliveries needs to be considered so that businesses and homes can get things delivered to them. If someone can't leave their home on their own they also can't collect deliveries and need them to come to their door. I am a befriender for a disabled person so I know how difficult it can be for someone to get around the town with roads closed. I fully understand wanting to limit traffic in the town but I think there are cleverer ways of doing this. One suggestions would be a park and ride and other alternatives that make driving less appealing. If you can make the other option more attractive you are more likely to succeed rather than trying to suceed by making driving difficult. That tends to just frustrate and anger people rather than get them on side and in this case can stop vulnerable people living their lives equally. In this case I appreciate that the shops want the road closed for business and that for others it is nice to limit the traffic while shopping so I hope that compromises like this can be put in place to find something that works for both as far as possible.</p>

Support	I approve the revised proposal for access to Gardner street in order to give access to a disabled resident ( and others with accessibility issues) who will otherwise be entirely housebound and unable to attend vital hospital appointments, support services and to enjoy the community as they were able to do before the restrictions were enforced.
Support	I myself am disabled and the importance of having easy access to the area is imperative. No-one should be imprisoned because of road closure times to the point of being housebound. Thank you for the above changes being implemented.
Support	I approve the above. I have fibromyalgia and ME and rely on transport for independence and mobility. If I didn't have access to transport I wouldn't be able to go anywhere and would also be trapped in my house. Please give this disabled person their dignity and transport back. Until you suffer with these illnesses, you have no idea how it impacts your life every single day.
Support	I approve the proposal as everyone should be able to freely leave their home and not be restricted. Being disabled is restrictive enough and we shouldn't have other restrictions enforced upon us.
Support	I am in favour of the changes proposed as mobility is an issue for disabled residents. I understand the need for pedestrian priority, but in some circumstances it is essential for vehicular access, as in the the case of disability. Transport is the only way for disabled people to leave their homes for appointments, shopping and leisure. This is why I approve the TRO-35a-2023 and TRO-35b-2023 for Gardner Street.
Object	I do not support the revocation of pedestrianised hours from Monday to Thursday. This is a backward step. It should be possible to be able to experience the improved environment and additional street space which results from prohibiting vehicles every day, not just Friday to Sunday. If we are serious about sustainable transport across the city we need to significantly reallocate space away from vehicular traffic to pedestrians and cyclists. Not the other way round. I am specifically commenting as a visitor/shopper to North Laine, not as a local resident (I live in Hove).

## Support

I am writing in my capacity as [REDACTED], on behalf of [REDACTED] members. We are Brighton & Hove's Blue [REDACTED] Community Group and have a membership of est 600 residents. We are broadly in support of the proposal to reopen Gardner Street from Mon - Thurs inclusive, so that disabled drivers and passengers who have restricted mobility can park or be dropped off on Gardner Street to enjoy the many amenities in this vibrant area. Very importantly, we also support the opening of the street to enable a disabled resident to be able to leave and return to their home during these days, be that for medical appointments or indeed any other pursuit that they choose. We politely request the further addition of another disabled bay further along the street so that both ends are served at least with one on street disabled parking space. We would also like to see a drop off/pick up point on the street for disabled passengers, ideally alongside the bay currently proposed. This would also facilitate the resident being able to be collected if the disabled bay is occupied and be useful for the taxi community. To better serve this street on the proposed closure days of Fri-Sun inclusive, we are keen to see the creation of a drop off/pick up point at the entrance to Gardner Street - close to the gate entrance if possible. Turning now to the detail of the closure: we are concerned that a 9pm closure effectively bars some of our members who rely on close parking from being able to access weekend culture as it would prevent them from being able to enjoy entertainment or a meal during the evening hours. We regard this as an equalities issue. We would prefer to see a 5pm (or at worst a 7pm) re-open to give some chance for disabled people to be able to join in with evening activities along here. For reference, George Street in Hove reopens at 4pm. We would also like to see Christmas Day and Boxing Day as exceptions and for the street to remain open on these days. Otherwise the disabled resident and indeed any other residents who may have mobility difficulties will be unable to join family or friends on these important days. Our preferred 'Equalities First' position would be to reopen the road fully every day, as although this TRO offers some improvement on the current TRO, it does still create a weekend 'segregation' which is deeply uncomfortable and not in keeping with the Accessible City Strategy or indeed the Council's pledge to improve access to all parts of the city for disabled people. If the weekend arrangements were reduced to an 11-5pm or 7pm (latest) then this is a reluctant agreement, in recognition of the fact that we are having to work back from a wholly untenable situation. We want to support the street with our Purple Pound, but we simply can't do that, if we can't park or be dropped off close enough to meet our friends, Loved Ones etc. We are pleased to see that bicycles would not be permitted, but we would like to raise a concern about the possibility of scooters being used on Gardner Street, and the risk of collision, as they aren't classed as 'pedal' vehicles, they could potentially still be used at some speed and this is something that is of concern. It is really important that future proposals for our City Centre are disability led, and the history of the Gardner Street changes have been rather questionable. Closed fully during COVID, then reopened to Blue Badge holders in recognition of the need to be able to access; then a Report which did not include the independent [REDACTED] Report that [REDACTED] had taken part in, the wholesale removal of Blue Badge bays which was never discussed as an option, and now the reinstatement of just 1 of the 2 original bays.

This is an opportunity to 'put back better' which would at least enable more Blue Badge holders to be able to park and access this area on the days and hopefully, the evenings, when Gardner Street is open. Otherwise it really isn't 'open to all' and that isn't in line with the Commitment to an Accessible City. [REDACTED]

Support	<p>I support the reopening of Gardner Street Monday to Thursday to restore access for disabled people who need to use their Blue Badge to park or be dropped off so they can also be part of the street community. When open, this Street would be more accessible if you put back both the original disabled bays and also add a drop off/pick up point at the Dorset end. This will offset the likelihood that the disabled bay will be in use, and help the disabled resident to be able to get to their medical appointments or just be able to go out with friends (something able bodied people take for granted). An additional drop off/pick up point outside the gated area would improve access during the road closure days. 9pm feels much too late as the reopen time on the Fri-Sun + Bank Holidays. That is too late and stops disabled people from being able to even 'join' everyone else on a Fri Sat or Sun evening. That feels very unfair. A 5pm limit would be more reasonable and then the evenings would be open for everyone to enjoy equitably. Christmas Day and Boxing Day should see the road open. The shops are shut so it's really harsh to block a disabled person in on those Bank Holidays especially. To be clear, an extended road closure isn't at all in line with the intention of the Accessible City Strategy or our City Values and the commitment to improving access for disabled people, so we're making the best of a bad job here. This certainly shouldn't be a 'blueprint' for the city centre. George Street was quoted to us as an example - it reopens at 4pm and this was requested by traders. It also has good disabled parking both in the street and at either end for the daytime when the road is closed. So the proposals for Gardner Street are still very bitter to swallow and are segregating our community. It sends a poor message to visitors that we treat disabled people differently. Please make sure that scooter users are also prevented from riding through the street, and enforcement to prevent abuse of the disabled bay/s, together with clear pavements and dropped kerbs free of traders clutter is essential, at all times.</p>
Support	<p>I am supporting the reopening of Gardner Street for Mondays-Thursdays. This will give the disabled person who lives in the street a chance to get to medical appointments, they can then leave &amp; return to their home on these days at least. Please would you add another disabled bay further along the street for me to use, I am a disabled wheelchair user. A drop off/pick up point would also be very helpful as sometimes disabled people use a taxi or have someone drop them off near where they want to go. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday Saturday Sunday or Bank Holidays. If the road doesn't</p>



	<p>open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or 7pm at the latest reopen would be a much more acceptable compromise. Please would you make an exception for Christmas Day &amp; Boxing Day so that the road can remain open, so that the disabled resident can be collected &amp; be able to enjoy this special time with their family or friends. When the road is closed it is important that bicycles &amp; scooters don't use this road &amp; come into conflict with people. During the periods of closure please would you improve enforcement so that uninterrupted pavement access &amp; dropped kerbs ( which need improvement as they're very unsafe for wheelchair users ) can be kept properly free of tables, chairs or traders racks &amp; stands. I feel that the road should be open over the weekend but I still need to support the TRO otherwise the Monday-Thursday period risks remaining closed. Thank you</p>
Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or a 7pm at the latest reopen would be a more acceptable compromise. Please will you make an exception for Christmas Day and Boxing Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.</p>

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Support	<p>As you are aware, we have vehemently opposed the current restrictions imposed on Gardner Street, which have created many issues for our beneficiaries. We are very pleased that measures have been proposed to return the street to somewhere close to its original state. We agree, in principle with the proposals, however, the new proposals meet only the absolute minimum requirements for accessibility, and we would like to see at least one further accessible parking bay, with a 6 hr maximum stay, as we feel one space for the whole street is insufficient to meet the needs of disabled people. We would also like to see the prohibition of vehicles reduced to Saturday/Sunday. We also would like to point out that whilst lifting the traffic prohibition solves some of the issues for disabled people, there are many other issues which need to be resolved to make the street more accessible. Whilst not necessarily TRO related, the street is in urgent need of better provision of dropped kerbs, and better enforcement of street signage, stalls and outside seating. We would be happy to enter into some further discussions around this and negotiate some user-led accessibility audits of the street.</p>
Object	<p>As busbiebsses having street closure 7 days a week from 11am-9pm would be the best solution. If this cannot be achieved then Wednesday to Sunday plus bank holidays seems a great compromise</p>

Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or a 7pm at the latest reopen would be a more acceptable compromise. Please will you make an exception for Christmas Day and Boxing Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.</p>
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Object	<p>This would be a terrible retrograde step to largely reverse the prohibition on driving on this road. Car drivers in central Brighton are a small minority of residents and visitors and already dominate the physical geography of the town. The current situation already creates huge amounts of noise, pollution and risk to the vast majority who travel on foot through our narrow streets. The council should concentrate on further reducing car journeys in the town centre by closing more streets to traffic, not doing the opposite!</p>
Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or a 7pm at the latest reopen would be a more acceptable compromise. Please will you make an exception for Christmas Day and Boxing Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.</p>

Support	<p>The road is not sufficiently wide to allow a car to pass when cars are parked in the residents' bays as well as off pavement on the single yellow line. As such it has become common practice to park with wheels on the south pavement. For many years we have observed the difficulty created by this with pushchairs and wheelchairs having to leave the pavement to go down the street. We have had to lift pushchairs over parked cars to exit our house. The implementation of double yellow lines will reduce the occurrence (as there are a surprising number of blue badge holders who partake of this practice). Further it will reduce the number of vehicles that drive the wrong way down the street in order to "quickly" get a space.</p>
Support	<p>I fully support these proposals. It is totally wrong and completely unfair to trap people with disabilities in their homes without making suitable provision for vehicle access and parking. Re-opening the road, if only for part of the week, will go some way towards mitigating the difficulties created by the earlier road closure. Blue badge bays are essential for people with disabilities. Please could the Council consider reintroducing both bays rather than just one? Parking and licensing regulations must also be properly enforced to avoid the use of the bay(s) being abused by other road users.</p>
Object	<p>Allowing motor vehicles to use this street during more hours and during more days will have negative effects on the pedestrians which use the road, which is the vast majority of the road users within this area. Allowing motor vehicles to access this road when currently prohibited will detract to from the pedestrian friendly realm which the area is known for along with reducing road safety.</p>

Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or a 7pm at the latest reopen would be a more acceptable compromise. Please will you make an exception for Christmas Day and Boxing Day and New Year's day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. More planning should have been done about this closure, the impact on disabled residents is unacceptable, and I don't think the consultation was adequate. Please consider disabled people before making these decisions in future.</p>
Support	<p>I support this only because it's an improvement on the current situation. Which is clearly unlawful under equality legislation. In addition to what is currently proposed, there should be additional disabled bays for visitors such as myself, no dangerous shared spaces between pedestrians and cyclists, and access for blue badge holders at all times. See other local authorities such as Oxford, which allow blue badge holders into pedestrianised zones at all times. This would be more consistent with the council's accessible city strategy.</p>



Object	<p>Gardner St. is a busy street popular with locals and tourists alike. It is at the heart of the North Laine. The city centre is already busier with motor vehicles than ever before. I have lived in Brighton for 52 years. Opening the street to traffic under the proposals will put pedestrians at risk, increase pollution and deter people from using businesses. Living in Brighton means that more space is given over to motor vehicles than pedestrians, and opening the street to vehicles signals to local voters that the current council are not serious about improving the environment for locals and visitors to the city. Pavements in the city are mostly narrow. There has been no attempt to alter this and this proposal signals that Brighton and Hove City Council favours motor vehicles over residents. I understand access for less mobile residents is an issue, but re opening the street for the amount of time proposed is excessive and a better solution should be explored to solve this matter. At no point should motor vehicles be given priority over people. Maybe a disabled bay should be reintroduced for the affected resident?</p>
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Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or a 7pm at the latest reopen would be a more acceptable compromise. Please will you make an exception for Christmas Day and Boxing Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.</p>
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Object	<p>There are depressingly few pedestrianised shopping areas in Brighton, those few that exist are a joy. Gardner Street is currently a precious oasis of traffic free calm. To open it up to motorised vehicles is a retrograde step. This new council seems hellbent on prioritising drivers of motor vehicles over other constituents, particularly vulnerable road users (e.g. pedestrians etc). The evidence about the health risks from motor vehicle emissions is too serious to ignore - see the Government's assessment here... <a href="https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution">https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution</a> . And of course the climate emergency should inform all local decision making. Far from removing those few areas which motor vehicles cannot access, the council should be encouraging all residents to embrace active travel alternatives and discourage the use of private motor vehicles. Active travel and Ultra Low Emmission Zones are the way forward. Other councils are making great headway with this. Why are Brighton and Hove not doing more? I voted for this council and I couldn't be more disillusioned. There's still time to get back on the right track though. Do the right thing BHCC</p>
Object	<p>The council have said this is being done for a resident on the street who needs to access their vehicle on the same street. You are using a sledgehammer to crack a nut. If the resident needs to park their vehicle on Gardner Street, grant them and them only vehicular access. I'm sure there's plenty of ways you could do this - retractable bollard operated by ANPR, code, or key fob, for example. Opening the whole street to traffic again encourages rat-running through a busy pedestrian street. The city desperately needs less traffic in it; making it easier to drive everywhere does nothing to discourage driving. Moreover, the logic here is all skewed - a single resident has asked for vehicular access, so you are opening the whole street up to all drivers. If a single resident said they needed a road to be entirely closed to vehicles for their mobility and safety, would you do it? I doubt it very much. This suggests that the underlying motivation here is not about access for this resident - which could be achieved in a number of other ways - but rather to simply open the road to drivers again, which will make the street less safe for pedestrians, and will only encourage more driving in a city that already has too much of it - and too much of the pollution that results from it.</p>

Support	<p>As a disabled and chronically ill person with high mobility needs, I am writing to you to inform you that I approve the revised TROs for Gardner Street. Mobility is something, understandably, which is very much taken for granted by able-bodied, well people. Unfortunately, for people such as myself, the world is an extremely limited place in terms of accessibility and having access to a car from door to door as a mobility aid makes the world that little bit easier for us to be a part of. The revised TROs would help disabled people such as myself to access not only Gardner Street itself, but the world outside of Gardner Street once I was in Gardner Street. I thank you for your reconsideration on this important matter.</p>
Comment	<p>As a disabled person it was upsetting to hear about this woman who has been made housebound by this regulation order. Too often we are overlooked in favour of other causes and as somebody who was housebound for a long time and felt suicidal and helpless as a result, this is something I feel strongly about. I imagine it's taken all the energy this woman had and more to fight this and she will be even more ill as a result. Please think of the impact of the disabled when enforcing these policies</p>
Comment	<p>We have lived in the Brighton area all our lives - a long time! My husband is now disabled and needs a wheelchair when going out. We cannot imagine being unable to go out at all and know we would become v depressed. We feel the following would help - 1) Access to Gardner Street Mon to Fri. 2) Have 2 blue badge spaces with limited parking time perhaps in road. 3) When road closed over weekend and bank holidays have area as already suggested at end of road. Sadly you have to have experienced a situation as with anything to fully understand the difficulties of disabled people.</p>

Support	<p>I approve TRO-35a-2023 and TRO-35b-2023 for Gardner Street because a woman with severe M.E. a devastating Neuro-immune disease that i also suffer with, is being left without the support, care and appointments she desperately needs. I understand this can be an inconvenience but for this woman this is so much more than that. Not only is it severely impacting her already limited quality of life but it is preventing her from accessing necessary appointments that are hard to come by and to rearrange. Although i do not know her personally, i do know her struggle and as someone who understands the severity of this situation i beg you to please hear her and to approve these policies and procedures</p>
Support	<p>I think we need to allow those who are disabled and house bound to access vital transport to their doors whenever they need it and not be trapped in their homes by road closures. This access is vital for both emergency, health and social activities which should be non discriminatory and equally available to those disabled as well as able bodied. A minimum of 2 Blue badge bays should be available on Gardner Street. As a long time Brighton resident I also think the weekend closure of Gardner street does not need to extend beyond 6 or 7pm at the latest in the summer months as by then all shops and most cafés are closed so footfall is reduced and outdoor seating unnecessary. I also think the weekend street closure hours should be shorter in the winter months to reflect reduced need especially after dusk around 4pm -5pm from November to March.</p>

Support	<p>I am in favour of the changes as laid out above, it will allow the residents access in and out of their homes at certain times. It is far from ideal, but better than it being a full time closure. I have a cousin who lives on this street, she has done for a very long time. She has been desperate for the council to have a rethink of the closure, as it has had a huge impact on her life in recent months. She has many medical issues, which need constant care from a multidisciplinary team, needs visits on a very regular, if not daily basis to her home, and obviously needs to be transported to appointments, therapies etc, she does not have her own transport, so relies solely on others to collect and return her home again, she is unable to walk very far. Blocked entry to her residence is the last thing she needs, she is extremely vulnerable, this has caused much worry and stress to her, which has been very detrimental to her health. Her family have been restricted in visiting her, access has been very difficult. She has become a prisoner in her own home. This I am sure you must agree, is far from fair or ideal for anyone, let alone a person with so many medical issues. It concerns us, her family, that this is happening to her, we are too far away and feel rather powerless to help, the only action we can take, is this, we are desperate for you to make this change. Please help her in some way and consider this change very seriously.</p>
Support	<p>I am frustrated these days by various vehicles for ongoing building work obstructing my gateway, and often think how difficult it would be if I depended on a wheelchair. It must be considerably worse for disabled people in Gardner Street who need transport for hospital appointments or to visit relatives. I understand some feel trapped in their homes. So please accept the recommendations in TRO-35a-2023 and TRO-35b-2023 for Gardner Street. I walked down Gardner Street last Saturday. The atmosphere was great with chairs outside cafes and street vendors. But I wonder, (God forbid), suppose there is a fire in one of these shops in the middle? I'm surprised the emergency services have not insisted on access for emergency access.</p>
Support	<p>However, I feel that it would better to replace both the blue badge bays and open up Gardiner Street Mon-Thursday.</p>

Support	<p>I approve the above proposals for Gardner Street. The present proposals place severe restrictions on the residents of Gardner street, particularly those with disabilities who are unable to access the services, and the support that they need. The new proposals will enable them to have weekly access to vehicles to allow people to attend appointments, and enjoy and make use of the street that they live in. Under the present restrictions applied to Gardner Street one resident Anne Ingle, is virtually a prisoner in her own home and is unable to attend necessary appointments, access health care and other community resources, or enjoy or make use of the street she lives in. I would draw the Council's attention to its duties under the Human Rights Act of 1998, and the Equality Act 2010 I would appreciate receiving information about the outcome of the consultation and any decisions reached by the Council.</p>
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Support

I am supportive of the changes proposed in these TROs, but with some reservations remaining. My sister was directly and severely affected by the changes made in the original TROs creating the current restrictions. These changes have also affected me when making visits, ensuring the whole process of visiting and supporting my sister became exceptionally difficult. It was abundantly clear that the previous consultation rode roughshod over the needs of disabled residents in particular, and that accessibility needs and requirements were completely ignored. The revised proposals in these TROs represent a broadly acceptable compromise that provides greater accessibility, though still creating restrictions that disproportionately affect disabled individuals. I would accept the proposals as a compromise but would ask that you give further thought on my remaining key reservations: 1. Allowing vehicles to use Gardner Street Monday to Thursday (except bank holidays) is a vast improvement, but this still means my sister cannot get to any medical/ health appointments on a Friday. I have had cancer treatment this year in Leeds and a number of my consultant appointments have been offered only on Fridays or Saturdays, and my radiotherapy was every working day for 6 weeks, so this can be an issue and you should consider what further help you can give such residents in relevant circumstances. Also, I understand shops are closed on Xmas day and Boxing Day, but visitors may call by, so please relax the restrictions on those days. 2. There should ideally be more than one disabled parking bay. It's well enough providing one, but if a disabled visitor to the street takes up the space when it's needed by a disabled resident then it's not a lot of help. It also needs to be clear that 'loading/ unloading' periods also apply to picking up and dropping off disabled residents by vehicles without blue badges displayed. I would reiterate that my sister has an essential medical need to be able to be collected and dropped off very close to her door. 3. The whole process for handling TROs needs much sharper focus and improved controls to ensure it is taking advice from appropriate organisations and individuals, and that critical advice around accessibility cannot be simply brushed aside in a pretence of democracy. The decision making around the original TRO's was absolutely atrocious and the process itself has caused massive worry and an immense amount of work to the very people that the process is supposed to help protect.



Support	<p>I am writing to lend my support for, and say I approve of, TRO-35a-2023 and TRO-35b-2023 for Gardner Street. I am relieved there has been an amendment to the road closure in support of a my befriender who is housebound and lives on Gardner Street. The prospect of her not being able to get out of her home for appointments because of the road closure was, and still is, causing her a great deal of stress. I understand the desire for a car free city centre, and environmental issues are hugely important to me - but this whole episode has made me realise how it cannot be just a black and white no cars policy when vehicles/cars enable those with disabilities to have mobility and freedom that others more able can take for granted. The revised TROs will go some way to addressing this.</p>
Support	<p>I am the niece of a resident who is currently detrimentally impacted by the current situation. As someone who has worked in Human Resources for a decade, I am shocked and appalled by the limited consideration for the residents of the street but above all the lack of reasonable adjustments made for those individuals who are disabled. I would strongly encourage you to consider the impact on the wellbeing and welfare of those who are unable to leave their homes and or get access to medical aid at flexible times, I cannot imagine how those who live on Gardner street are feeling and how trapped and isolated they must feel with the current situation. How would you feel knowing if your health declined and you needed support immediately or out of hours that someone you trust might not be able to park close enough to your home to assist you? Accessibility is critical for these individuals. The restrictions that have been put into place are not right and not fair and certainly go against promoting a community where everyone feels safe and equal. That is all the residents are asking for here, not preferential treatment just being treated fairly. I am therefore fully supportive of the two orders named above and would ask that the amends cited are implemented immediately to avoid further distress to all those impacted</p>

Support

I am writing in my capacity as Chair of the Older People's Council (OPC) to approve these changes. It is outrageous that residents can be denied full access to their property, but even more so when this applies to older &/or disabled residents who rely on vehicles accessing either to exit the street themselves or to receive services. We appreciate that many people can benefit from areas free of traffic but it is simply unacceptable for this to be in a street with residents who may require vehicle access to access the community themselves. This is where the desires of a majority, upheld through democratic processes, can negatively impact the needs of a minority with 'protected characteristics'. The needs of the latter are upheld within The Equality Act 2010 which puts a duty on public bodies to take these into account, not in a tick-box exercise, which unfortunately equality impact assessments have become, but to genuinely uphold the rights of such residents to fully participate in the community. I note that the changes proposed, whilst an improvement, are very much a limited compromise, falling some way short of the Act's intentions as detailed above. Obviously for residents affected a reversal of the Traffic Regulation Order (TRO) put in place in Jan 23 would be optimal but failing that we propose further amendments as follows: 1.Blue Badge spaces to be reinstalled to the maximum permissible. 2.Installing drop-off points for non Blue Badge holders (many people who have mobility issues do not meet the threshold of a Blue Badge), taxi users or those dropped off by someone else.3.On Friday – Sunday having an earlier opening time of 6pm. 4.Open Gardner Street on Christmas and New Years Day and any days when shops are not open. 5.Improving enforcement so drop curbs aren't blocked and walkways are kept free. 6.Making sure bicycles/scooters don't use the road when closed7. Ensuring that vehicles do not reverse up the road or use loading bays to park up when closed.

Support	<p>Whilst in general I applaud pedestrianisation it has presented a huge problem of accessibility for my cousin who depends on door to door transport to get out, particularly to medical appointments. I feel that we have to make sure that when decisions are made the health, security and mental health of those with mobility issues are given generous consideration. This TRO proposal goes some way to relieving this issue for my cousin, with access to transport during the week and the blue badge bay at the north end of the street she will be able to get out again. I hope this change has plenty of support as it will make a huge difference.</p>
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Support	<p>I am writing to approve the proposed TRO's for Gardner Street TRO-35a-2023 and TRO-35b-2023. I approve of both orders - to open the road for vehicles so that disabled people can use vehicles and taxi's and also to be able to park in the Blue Badge spaces directly on the street. Please note that whilst I approve the above TRO's, I also ask that you take the time to read the following few notes. As a carer I often have to take disabled people to medical appointments and also for being out in the community. I know how difficult it is to physically help disabled people who are not easily able to walk get in and out of cars, in and out of their houses and also in and out of the facility we have to go to. This can mean lifting, getting people into and out of wheelchairs and guiding people into the vehicle. These are not easy things to do. Sometimes people also have behavioural or cognitive problems that make this more difficult, but this is no reason that a disabled person should be excluded from a place. As someone with much experience of this, I wonder if anyone in the council has experience of this? Moving blue badge spaces away from someone's home should not have been done and these should be put back. Vehicle access to a road also allows a carer to get close to a disabled person's home and without this it is very difficult or impossible to do what is needed. The previous council basically trapped the housebound person and this needs to be reversed too. As someone that also drives disabled people into different places in the community, I don't think the council should have made somewhere inaccessible either for disabled people or their family and friends. Council's shouldn't be shutting down roads to vehicles for disabled people. If you don't allow a disabled child somewhere, then their family can't go there either. It takes a good deal of preparation and thinking time by the disabled person and the carer/s to work out how to get to do things. This shouldn't be underestimated, and I don't think authorities have any idea. Sometimes people can't be in wheelchairs or can't walk a long distance, but it's equally difficult to push someone in a wheelchair for a long distance. Lots of disabled people don't have wheelchairs. I probably have a different idea of a long distance to what your idea is, because if you can easily walk you wouldn't have come across this problem. But the people I care for have different needs to you. As a driver of a disabled person that regularly has to go to medical appointments and know how difficult it is, the decision that let the road be closed was not sensible, reasonable or had any understanding of what disabled people need and how they have to live. From a carers perspective it discriminated against disabled people. The newly proposed TRO goes somewhere to rectify this and so I approve of it, but it really should go further. As I am not the person's actual carer I don't feel able to say, but I hope my contribution gives a perspective that you probably don't hear enough of.</p>
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Support	<p>I'm a befriender for a disabled person who lives on Gardener Street. In the past months and year even, I've become aware of how restricted her life has become but income ways the extent of this can be changed. I can see that her voice is beginning to be heard, on behalf of others too. Her life could be changed for the better if enabling decisions were made by those who have the power to make a difference. As I'm sure, you will understand what a difference Blue Badge spaces make. What will make her and other disabled people who live in that street, is to have access – and being related to a disabled person, I know how much. And 'proper' ones too, with all that goes along with what that implies (dropped curves etc). It was good to hear of the extension of the hours the street will be open. It will make all the difference to disabled people getting to appointments, day centres and so on. But Monday to Thursday is still restrictive. Let's get Brighton living up to its reputation as an inclusive, welcoming and above all, kind city. It's a pity it's taken so long to get voices heard on these and other related points. We can do better.</p>
Object	<p>I'm objecting to this on the following grounds: - Allowing all vehicles in Gardner St Mon- Thurs will make it less safe and convenient for pedestrians, disabled people and cyclists by introducing conflict with traffic - The previous but one order for similar times restricted access to MOTOR vehicles ie cycles were allowed. The proposed order removes access for cycles thus restricting access by cyclists especially any that are disabled and unable to dismount or walk easily - The proposed measures will make it harder to disabled people to use the street during the hours of operation when tables &amp; chairs will obstruct both the footway and carriageway. There are no proposals to ensure that there is a usable pedestrian width of 2m as set out in Inclusive Mobility. Also If the intention is to allow access to Blue Badge holders this could be done by an exemption to the existing order rather than removing it</p>

Support	<p>I am writing to approve TRO-35a-2023 and TRO-35b-2023 for Gardner Street. I have been a full time Brighton resident for almost a year, and a part time resident for almost 15. I am a PA in adult social care, and I'm keenly aware of how the closure of Gardner Street affects disabled, elderly, and non-disabled residents. At present, ambulances are unable to access Gardner Street. Local disabled residents cannot access each other's homes, be visited by friends or family, access at home medical care or transport to their door to take them to medical appointments. Disabled residents, the ambulance service, and medical professionals who perform home visits were not considered or consulted regarding the closure of Gardner Street. Opening the street via TRO-35a-2023 and TRO-35b-2023 is a step in the right direction. This is however a compromise. Disabled residents and visitors' access is being shunted to the less busy end of the week for the sake of business. I do not feel this is acceptable in the long term. Regarding the closure of Gardner Street, I see many cyclists opposing the new TRO. Mixing cyclists and pedestrians was never a sensible idea. Between pedestrians and obstructions on the road, Gardner Street is not fit or safe for cyclists. Following that, I see no good reason why only one Blue Badge space is being reinstated when there were previously two on Gardner Street. Removing these without sufficient replacements, or consulting disabled residents, is deeply concerning, and leads to segregation. When reinstating the Blue Badge space, or ideally spaces, the size of said spaces must be considered. Residents requiring minibuses, community transport, or hoists, must be taken into consideration. They require more space. Adding drop off points for taxis and other transport for disabled and elderly residents when the street is closed Friday through Sunday would be another step in the right direction. As mentioned before, the size of these points must be considered. It can take time to enter/exit vehicles, as well as set up mobility aids. As a PA in domiciliary care, I must manage whatever situation my client is in. As is, I cannot access Gardner Street with confidence that my clients will be safe. It is in fact a near constant concern of mine when working. My clients have the right to access every and any part of the city, and it is my job to be with them. I feel it is worth pointing out that prior to the closure of Gardner Street there were no traffic accidents, nor were there when the Blue Badge spaces were in place. Another matter for consideration is the dropped kerbs on Gardner Street. As is, they are insufficient. They are not properly sized, some are dangerous, and all are almost constantly obstructed by wares and tables from local traders. I understand the Council must take into consideration traders on Gardner Street, but business should not outweigh access or safety. If the Council considers themselves inclusive of disability, this must be kept in mind. It is vital that licensing and parking regulations are enforced to keep Blue Badge spaces free for Blue Badge holders, monitor the access to dropped kerbs, make sure loading and unloading are kept to the 30 minute time limit, and keep pick up/drop off points clear. Moving forward, there needs to be clearer communication with the traders of Gardner Street as to what is and isn't acceptable for them in terms of road access. As mentioned previously, they constantly obstruct dropped kerbs and pathways, at the expense of disabled residents. This continues even after 5 PM, when traders no longer have access to the road or pavements. Disabled residents and their carers need more space than is typically assumed. I hope the Council will</p>
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keep this in mind. A 4 day open is a start. I feel Gardner Street should be open for a minimum of 5 days, if not 7. Anything less than 4 would be utterly unacceptable. Disabled residents have a right to access Gardner Street every day of the week, not just the days that are 'convenient' for everyone else. More and more of Brighton and Hove is being made inaccessible to disabled residents and visitors. Is this the sort of city we want to build? Regarding the opening of Gardner Street at the weekends - Businesses are long closed before 9PM. I feel a 7PM open would be more appropriate, and of benefit to traders on Gardner Street, such as Komedia, Gourmet Burger Kitchen, and The Dorset Bar & Kitchen. I also feel the barrier to Gardner Street should be opened Christmas and New Year's Day. Most traders will be closed, and residents likely will not be shopping. Disabled residents however will be barred from visiting, or having visitors, due to not being able to access the road. While the overall tone of my email is harsh, I want to emphasise that I strongly support TRO-35a-2023 and TRO-35b-2023. My frustration is borne of witnessing my clients struggle, and hearing about experiences of disabled residents regarding the closure of Gardner Street. This is a step in the right direction, and I hope the new Council continues with this momentum.

## Support

I work full-time in Brighton, and visit Gardner Street regularly as a befriender of one of its residents. They are house-bound and have chronic illness, and due to the current road closure, have been unable to get out of their flat even for medical appointments. This has severely impacted both their mental and physical health as a result. As a befriender, I am acutely aware that some residents are more vulnerable, isolated, and lonely. The proposed changes will have an undoubtedly positive impact on my befriender, as well as the wider group of residents who are currently unable to get out and about due to the road closures. The addition of blue badge spaces for days the road is open, and drop off points at either end of Gardner Street for days it is closed, would also make access easier. My befriender is unable to get out and about unless they have a car take them from door to door – and the use of mobility aids like wheelchairs is extremely difficult on Gardner Street, due to a combination of uneven surfaces, shops and restaurants using the pavements for displays and tables, and very steep dropped curbs. Finally, although opening the road from Monday to Thursday is a move in the right direction, it is still not fully inclusive of everyone who lives on this road. They should also be entitled to a way to get out over the weekends (arguably the more social days!) My befriender has said to me ‘I just want to get to the dentist’ – and it’s quite shocking and disappointing that something as simple as attending a medical appointment has taken this much time, effort and hard work on their part. Just because the residents of Gardner Street who have chronic illness, are disabled or isolated, are in the minority on this road, does not mean that they should not be catered for. Everyone should be able to get to the dentist! And one final, final comment. The process for this could be much more inclusive and accessible – in particular the short time in order to provide comments can severely impact people who require additional time to process information.



Support	<p>I am emailing on behalf of myself and a number of our members who want to support a resident of Gardner Street in Brighton to make a change to current traffic regulations. A Member recently contacted us to make us aware of her story and struggles with access to and from their home. Accessibility and reasonable adjustments for people is something that our organisation, Speak Out, is really passionate about. We work with people with learning disabilities and complex needs who often feel trapped and restricted in Brighton and Hove due to accessibility problems around the city. We would also point out that the current situation on Gardner Street seems to be completely at odds with the aims of the new Accessible City Strategy, which is meant to enable, rather than disable, people in Brighton and Hove. Therefore, we fully support you making the adjustments necessary to allow some vehicle access so that this resident can get out and about more freely. These members would like to support / approve the proposed TRO:</p>
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Object	<p>I don't think that one solitary disabled parking bay, a little closer than other disabled parking bays nearby are to some of Gardner Street, will make much of a difference to disabled people, especially given that it's available for use only during weekdays (when i suppose family and friends are less likely to be available) and when the road is open to traffic and the pavements will be, if anything, more cluttered with A-boards and furniture, than when businesses can put it in the road. I think what would be of more help to disabled people, and other people, is to make sure that the public footpaths and access ramp areas, if not also a strip of the road when it is open to pedestrians, are kept absolutely and completely clear of A-boards and furniture and plants and whatever else. There has been a noticeable increase of footfall and trade on Gardner Street during the period that Gardner Street has been closed to vehicles and pedestrianised for the full week. I would suggest considering providing a time limited parking space during pedestrianised hours, at each end of Gardner Street, flush with North Road and Church Street, for delivery vehicles and the like (of a small enough size), and perhaps also taxis, by moving the barrier(s) slightly further in and along Gardner Street. This might allow the road to be closed earlier than 11:00.</p>
Object	The street should continue to be closed to vehicle traffic during the daytime to allow pedestrian priority
Support	One of our scheme members lives in the area. They are housebound and cannot access important health appointments without access to transport. So having access, Blue Badge spaces back or having drop off points are integral.

Support	<p>I am writing to say that I approve TRO-35a-2023 and TRO-35b-2023 for Gardner Street. I am aware of the issues affecting my friend who has access needs, and who would be adversely affected by limits to vehicle access in this residential area. Therefore, I support moves that enable access for as many days of the week as is possible. Having Blue Badge bays on the street -- at least one on each end -- plus safe drop-off points are important to allow residents to safely get in and out of vehicles and set up their mobility aids. I am aware of how much disability and mobility impairment can impact well-being, and that it is extremely important for those affected to be able to easily access health care and to socialise and travel freely from their homes. Therefore, I urge you to accept the new TRO proposal, which will help enable vulnerable Brighton residents to go about their daily lives with reasonable level of freedom and support.</p>
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Support

This email is to say that I approve TRO-35a-2023 and TRO-35b-2023. I am not a resident of Brighton but a family member of mine lives in Gardner Street and is greatly affected by the closure restrictions which mean they are unable to leave their home for any medical appointments or social interactions (which are limited by disabilities anyway). The current situation makes it impossible for any friends or relatives to drive to the street and provide transport anywhere. We also have other family members who have a blue badge. Surely it would be better to have Blue Badge spaces and drop off points so that people were able to access Gardner Street facilities as well as residents being able to leave for medical appointments in particular. The blue badge bay marked at the North End on the diagram is particularly important for my relative. There are a great many disabilities which may mean someone needs to have a guaranteed route from home to a car where they feel safe. Lots of these are invisible and might include mental health issues, autism, hearing loss, sight loss, dementia and ADHD. Keeping the road closed to traffic for the hours when they would be out for medical appointments has resulted in my family member being housebound and under great stress for far too long. It is important for Gardner Street to be open for at least the Monday to Thursday as proposed but would be even better for a change to 7 days rather than the 5. I am very concerned that the other interest groups with greater resources seem to have moved things forward more effectively. It appears that people with disabilities have had less advocacy and therefore less voice in any decisions. It is appalling that there have been no reasonable adjustments made during this period of road closures and that needs to be addressed now with this proposal. My family member has suffered serious mental health problems due to this issue and I hope the Council will now understand the need for supporting those with disabilities rather than disadvantaging them further.

Support	<p>This is to say I approve of the proposed TRO's for Gardner Street TRO-35a-2023 and TRO-35b-2023. The new proposal came to my attention because of the wide ranging and serious negative affect the current situation has on a family member. However, this also has much wider reach than them alone. I am a disabled person myself and understand the various difficulties well. I ask that Brighton and Hove City Council keep information confidential, specifically in relation to any identifiable person. I now live in Australia but retain UK citizenship, several times returning to UK for year long visits. I love Brighton and can see why, over 15 years ago, my sibling, chose to make their home in Gardner Street, where they continue to live.*Please note; when people living with disabilities are mentioned in this e-mail I particularly mean people who are severely restricted when it comes to mobility, when a vehicle is an essential mobility aid. It is too long a sentence to put everywhere.*The reason I approve the above mentioned TRO's is because it is a step in the right direction for the many people living with disabilities who are residents of Brighton as well as for those who are living with disabilities and like to visit Brighton. Likewise it is a step forwards for their carers/families/friends etc. I encourage everyone concerned to take the time to read the few points below. I know Gardner Street to be a vibrant, well established residential and business street, but, for a family member the current road situation since the beginning of the year has been the cause of great angst, frustration and forced exclusion. Increased disablement/increased isolation/increased loneliness and so on. For them, every single aspect of life has deteriorated drastically/become more complicated. The proposed TRO's, if passed, will help alleviate this specific situation, and do the same for others in similar situations. It will not simply allow more freedom of geographical movement, of being able to get to where they need/want to be, it will assist with feelings of safety, of being cared about, of belonging to and being part of a more cohesive and accepting community. People living with disabilities, their carers, families etc should be allowed to live in the mainstream of life. The proposed TRO's are a great aid towards positive messaging. I do want to say that Monday to Thursday does limit people living with disabilities, and for my family member they will not be able to get to Friday Clinics etc. This is a big compromise that I hope businesses/Council understand, because at the same time as being a step forward, the proposed TRO's really push disabled people to the less sociable end of the week. People living with severe disabilities are removed from the mainstream when the road access closes on Fridays. Extending the road closure times from 9am to 9pm on Fridays, Saturdays and Sundays is difficult to comprehend and further excludes many people with severe disabilities from mainstream living. Also, the proposed TRO's cover Christmas Day and New Years Day. This denies my family member the ability to get out and visitors who are disabled from getting in. It also denies people living with disabilities, their family/friends/carers from meetups within Gardner Street or family/friends/carers from visiting Gardner Street on Christmas Day and New Years Day which traditionally, are times for family/friends/carers to visit and in my family members case, perhaps the only days of the year when some members of the family could visit and plan to take them for a short trip out in a vehicle. Shops are closed on Christmas day aren't they? Is there a possibility that the road</p>
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could remain open on Christmas Day and Boxing Day. Re; Blue Badge spaces. I understand there are a couple of disabled people on Gardner Street, one is my sibling who needs vehicle access directly from their front door. In such a situation a vehicle is their 'essential' mobility aid. At the beginning of this year two necessary Blue Badge spaces were removed from Gardner Street and were relocated too far away for them to reach. The choice to remove the established vehicular access to a housebound person's front door was poor planning at best and needs to be corrected. Both of the Blue Badge spaces that were relocated need to be put back as they were. If anything, more Blue Badge spaces need to be created on Gardner Street as well as some 'short time drop-off points' for people with disabilities, but not at the cost of the two necessary Blue Badge spaces. Many people living with disabilities have to think harder, plan harder, prepare more to achieve anything, including planning a trip to a medical appointment. These concerns need to be addressed, life shouldn't be this difficult for so many people. Often, whole families miss out because they don't want to leave their disabled loved one at home whilst they go out and enjoy themselves. Equally, carers need access to Gardner Street to do their jobs properly and currently I know this isn't happening. Having various disabilities and impairments myself and being someone who needs to get out everyday I would also stress the need for disability-aware surroundings. At present street furniture is often in the way and the dropped curbs are a problem. Using a Guide Dog or a long white cane, and sometimes a wheelchair with my Guide Dog along side, I know how important clear access is and hope that businesses/Council will start to understand how problematic obstructions and schemes that haven't been well thought through are. Imagine the very real situation of a blind parent trying to navigate their way around the area with young children, perhaps a pushchair, in hand. My hope is that Council begins to consult with disability groups in a more dynamic way with a force that stimulates change or progress in a way that keeps people living with disabilities in the mainstream of life rather than on the edge. In terms of consultation, I feel Council could do more. Work with Disability organisations clearly and in depth, understand that individuals living with disabilities often require advocates during consultation periods. It takes most disabled people a lot longer to put together comments to proposals than it does for most people, some are too ill to create their own input. This is unfair as we already have to work with a lot more administration than most people throughout our daily lives. I feel it is important for Council to ask the right questions, broader questions and say what they intend. To be clear, open and fair. Also, I feel it is important for Council to alert their disabled citizens regarding future TRO changes, perhaps discuss the many different ways to contact/connect with disabled communities and known individuals. I would like to end with the following; "I miss hearing an actual conversation". Think about it for a moment. I replay those words and all I can hear is "I miss life".

Object

I enjoy using this street as a pedestrian on all days of the week, and prefer to keep the area favourable to pedestrians over cars. Please do not do this.

Object	<p>The pedestrianisation of Gardner Street has massively improved the experience of those visiting the businesses there, and the businesses themselves. There needs to be fewer cars. Not more. There are a number of streets in the area that cars can use to access the area. This one is not the only one and therefore is not essential to be open to traffic.</p>
Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the early evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm reopen would be a reasonable adjustment. Please will you make an exception for Christmas, Boxing &amp; New Year's Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.</p>

Object	<p>I wish to strongly object to the revoking of TRO-35a-2023, the Prohibition of Driving Monday to Sunday 11am to 5pm on Gardner Street and the commencement of TRO-35b-2023, which reintroduces motorised traffic to a narrow city-centre street, against the wishes of many people, including traders on the street. This is a highly regressive and dangerous step that will have negative consequences for the vast majority of those trading on, living in, and visiting the street. I oppose the change for several reasons: - The removal of vehicular traffic makes the public space on the street much more pleasant, safer to walk in, more accessible to those using mobility aids, and easier for carers pushing children in buggies to navigate. - Allowing vehicles onto the street is likely to increase net carbon emissions, contributing to climate breakdown. - The reintroduction of fumes from car exhausts adds pollution to the air in the street, which is a significant public health issue, particularly for those with respiratory problems. - Reintroducing traffic increases the potential for road collisions and injuries. Many council administrations around the world, as well as in the UK, are demonstrating real leadership by removing traffic from city centre streets for the reasons outlined above. For the well-being of its citizens, Brighton and Hove Council needs to follow suit; the closure of Gardner Street to traffic by the previous council administration was a positive step in this direction, and revoking the previous TRO would be a significant misstep. It's unfortunate that a disabled person living on Gardner Street can no longer be transported by car to appointments from their front door. With the advancements in alternative, cleaner forms of transport, an alternative means of transportation needs to be put into place. However, the well-being of all needs to be considered, which is why the closure to traffic should remain. Of course, disabled parking should remain close by. One of the most difficult but necessary challenges that local administrations face is the urgent need to remove polluting traffic from our city centres. We are being made increasingly aware of the problems - pollution, danger, health problems, and greenhouse gas emissions - caused by fumes and particulate matter from motorised traffic. It is thus highly irresponsible to reintroduce traffic onto a street as central as this, and I urge you to reconsider.</p>
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Support	<p>I am a befriender of someone living on Gartner Street and a former Brighton resident. I am writing to you to express that I approve TRO-35a-2023 and TRO-35b-2023 for Gardner Street. I think that the street should be opened throughout the week to enable all residents easy access to the vehicles. The partial closure of the road does not seem to be a reasonable solution since there are unexpected events which could happen anytime and I would expect the city of Brighton to take that into consideration.</p>
Support	<p>I have previously worked with a housebound/ disabled person on Gardner St and for other disabled people in the city and I am aware of the difficulties they face trying to access their community, appointments and getting around in general. Please keep our city accessible for everyone to use and enjoy, be ensuring enough Blue Badge Bays, keeping areas and streets open and accessible for wheelchair and mobility aid users. Lets keep Brighton accessible for all to enjoy!</p>
Object	<p>I object to Brighton &amp; Hove (Prohibition of Vehicles) (Gardner Street) Order 202* (TRO-35a-2023) but this is not an objection to the prohibition of driving motor vehicles as long as cycling is not also banned. The issue in this TRO is the change of use of public space. The footway is not adequate space for people to get about during TRO 35a's proposed hours of operation if the carriageway is going to be totally blocked with street furniture. I see that on Bank Holiday Monday 28/8/23, the businesses had already adopted the arrangement proposed in TRO 35a prior to approval, and the result was that the carriageway was barriered off and people were passing with difficulty on the pavement as though on a narrow peripheral walkway. Under these conditions, taking any wheeled equipment (buggies, wheelchairs, mobility vehicles, cycles etc.) along the narrow pavements results in obstruction to others. Recent observation on Bank Holiday Monday 28/8/23 showed that business people are placing things on the pavements in addition to on the carriageway in an attempt to attract customers, but this is resulting in an unacceptable loss of public space. There are points on the pavement in Gardner Street where dropped kerbs have been put in and the useable pavement width is reduced further. There should be an adequate thoroughfare for people to wheel, cycle or walk in comfort in the streets of Brighton and Hove. Cycling should not be banned on the days of operation. This would be a retrograde step and counter to many local BHCC and national policies to increase active travel, enabling the use of cargo bikes for deliveries and reducing the many disbenefits of car-dependence. It is important for the centre of Brighton to be permeable to cycling and wheeling. Access for disabled people needs to be retained.</p>

Support	<p>I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the early evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm reopen would be a reasonable adjustment. Please will you make an exception for Christmas, Boxing &amp; New Year's Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.</p>
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Support	<p>I approve of both TRO-35a-2023 and TRO-35b-2023 for Gardner Street. The proposed TRO's will allow much needed access to the road for at least part of the week and put back at least one Blue Badge. In general this will help both disabled people that need vehicular access to the street, as well as businesses that have shown themselves to need vehicles during the day (as there's been countless infractions). Disabled residents would be able to access vehicles to get to medical and community appointments for four days of the week. Although it is welcome, there are a number of problems with the TRO and it's obvious it's very much a 'compromise'. It also allows any business that put things on the road more time at their monetarily profitable times of Friday/Saturday/Sunday/Bank Holidays. Disabled people have made a big modification, and 'editing' of their life that shouldn't be happening. I hope this will be fully pointed out. There are a number of problems with the 'compromise':</p> <ul style="list-style-type: none"> <li>• It means that disabled people (themselves, or those who rely on others) who have mostly weekday working/caring practices or medical/community appointments would not have any access to the road. These repercussions should not be ignored or seen as 'okay'.</li> <li>• There's an assumption/prejudice that disabled people 'do nothing' and therefore can 'fit in with everyone else'. This shows a disparaging approach to issues concerning disability and mobility and displays ableism. Often the significance is dismissed altogether or considered negatively by raising the 'proportionality argument' from the Equalities Act 2010 and therefore displays disablism. Minorities will never be proportionally 'bigger'.</li> <li>• This is not to be seen as good practice and does not give licence to this happening in other parts of the city. The problems this causes should be seen as a loss to be taken seriously and discussed within the Accessibility City Strategy. This is segregation for disabled people within the community. Mobility is a vital and urgent need for disabled people.</li> <li>• It goes some extent in recognising that disabled people need vehicles/taxi/community transport. The current status of Gardner Street shows a denial that different disabilities, impairments or health conditions necessitate individualised transport suitable for individuals needs. The question remains of why this isn't an automatic consideration in Transport Policy – as 'Transport' is also a social asset. This truth cannot be superseded by say the EEC need to 'influence people's travel choice' or suggest that mobility-disabled people who need vehicles should try 'active travel' instead and get in a wheelchair. We simply get stuck in our homes.</li> <li>• As it stands it doesn't let disabled people to go out and be social like others at the weekend.</li> <li>• Over the past few years there has been widespread reporting in disability groups of people not now going into The South Lanes/Sydney St etc. after road, pavement or pavement-use changes have made this very difficult. This denial of health needs and the culminative effects of these changes is very worrying and originates from an acceptance of ableist policy and culture.</li> <li>• It needs to be recognised that the proposed TRO hasn't been returned to the original Monday-Friday or indeed consideration given to include Saturday and Sunday. The proposed TRO needs to be passed as the road changes made since January haven't worked: There were still often vehicles on the road after the January daytime closure. Vehicles remained after the barrier was closed (sign writer/van there whilst working all day, carpenter mending benches, food truck parked up doing rounds, vans loaded from shops) and they proceeded to drive the length of the road when it was 'legally closed'. Further down there were often personal/business vehicles parked in the loading bay (building, roofing and management contractors etc.) that reversed up the road when closed. So there is obviously a need. Delivery mopeds/motorbikes often appeared. Weirdly hardly any bicycles. Emergency vehicles had to reverse the entire way up the street – and frighteningly there seemed to be no Emergency or Medical Transport plan developed beforehand. The last eight months has been a really confusing and changing-daily situation for all disabled people (not solely wheelchair and mobility scooter users) on Gardner Street. The previous Council's approach points to lack of disability knowledge within and between Council departments. Wheelchairs aren't suitable for many as people that find mobility difficult could have dementia, learning difficulties, energy limiting conditions and pain, neurodiversity, mental health or cognitive concerns etc. We may use other types of aids, if any, such as a Rollator, car, cane or support animal. Since January Gardner Street has become like some strange, confused obstacle course. This wouldn't be tolerated if the equivalent happened for non-disabled people. If you have balance problems it's a nightmare. I know people with sight loss that won't come along anymore (and Sydney St.). It is an environment that changes daily so it is impossible to 'learn a 'map' and there's no longer any 'shore-line' to follow. The new drop kerbs can be quite dangerous, contrary to guidelines at being less than 1200mil against road</li> </ul>
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surface/'bull-nose'. They are quite steep - which is also a problem travelling along the pavement. If it's drab display tables are suddenly taken from the road and put on the pavement under awnings (or visa versa). This isn't indicative of all traders, but some seem to have 'taken ownership' of what is public space, and do with it what they will. Some have consistently placed their clothes rails or display tables onto the drop kerbs, making them unusable. There is often too narrow a space between a drop kerb and cafes tables/chairs. At 5pm a couple of shops immediately put tables on the pavement and block it entirely. The 'cross-over points' get covered. Residents front doors get blocked. At the Committee Meeting accepting the road closure, the BID representative said businesses would do what is asked regarding disability. This clearly hasn't happened. There is minimal understanding and an attitude of 'it doesn't really matter', it seems socially accepted and even a bit of a joke. There is no recognition for what this does for disabled people's safety, peace of mind or ability to use this public space well -we can't be here if it changes day-to-day due to staff preferences. Most disabled people have to plan continually to do day-to-day things, and all this makes it impossible. Hopefully the new TRO will go through with a sensible audit (maybe in two parts) from an outside agency. Measurements need to be taken of the physical installation of drop kerbs etc, for example whether any 'bull nose' is too high. And an audit also needs to take place when the road is 'in action', on a busy Saturday in good weather to allow the problems to show up properly, maybe allowing different comments to be included from different times of the day/changing weather conditions. BHCC need to take it's Duty of Care seriously: Brighton is supposed to be inclusive. The Council needs to be much clearer, and state that disabled people or older people are welcome residents and act on it. Drop kerbs should feel safe to use, whereas they seem to have been used to say 'look how good we are'. They seemed to have been installed in relation cafes needs (for decades Fabric Fair had goods neatly placed outside, but the recent drop kerb installation has created this into a hazard). The focus should be on disabled persons needs (the drop kerbs aren't opposite each other) and the lack of this shows a cynical, derisory approach making it acceptable for disabled people to be 'shamed'. Whether this is putting obstacles directly on drop kerbs or indeed posting on social media that disabled people are lying about the situation in Gardner Street. The Council need to take this seriously. Associated BHCC plans and policies that support acceptance of the proposed TRO: BHCC fair and inclusive action plans & diversity policies recognise disabled people don't enjoy inclusion as other groups do and that there is community/corporate ignorance of this. The Equality Act 2010 is nearly 15 years old but there is no sense of belonging for disabled people unless we are the 'easy kind of disabled'. The January closure created many problems and there has been ample time to correct them. Unfortunately the last Council exacerbated problems leading to a belief that certain things are acceptable. Brighton thinks itself an inclusive city, but discriminatory practices are simply named as 'proportionate'. The Equalities Impact Assessment process for Gardner Street was disrespectfully treated and missed out whole groups of negatively affected people such as older residents, family and professional carers/PA's and neurodiverse people. The EIA itself was found to neither have been reviewed nor signed off by the Equality Lead or Integrated Care Board as necessitated by the Act. The Public Sector's Equality of Duty is supposed to eliminate discrimination, advance equality of opportunity and foster good relations between different people. The previous Council enabled divisions to occur. The whole point of anti-discrimination legislation is to ensure equity between disabled people and others, in this case some disabled people need cars, therefore BHCC need an equitable traffic/mobility policy that is fair and includes us. BHCC are supposed to facilitate Independent Living. The current road situation consciously curtails our experiences and stops us from being independent. Obvious in the case of not getting to medical/community appointments, but socialising, working or shopping are affected too. The damning irony of the Komedia building being one of Brighton's few fully accessible venues but (with the current Gardner Street policy) disabled people aren't able to get there or park outside as the Blue Badge was cruelly removed, seems to have occurred to no one in power. Disabled people notice though when we turn up and then have to go home immediately. At least both Blue Badge spaces need to be put back. The Healthy, Caring City Strategies are supposed to ensure that health and care services meet the needs of all to live independently, including disabled people and carers that need vehicles as mobility aids, or to have at home medical services get to them easily. The Climate Assembly's workshop on Inclusion repeatedly endorsed that 'exceptions must be made for people who need to use their car, like disabled

people' and also said 'in areas that are pedestrianised, allow access for vehicles carrying people with disabilities who won't otherwise be able to access those places'. Equally during BHCC's 2020 Emergency Active Travel Measures concerns were raised about the negative impact on, and 'distress and upset caused' to disabled car users. It recognised it should meet the different needs of people from protected groups. BHCC designing places where they know mobility-disabled people can't go needs to be stopped. We need to occupy public space like everyone else. The Accessible City Strategy that states BHCC will 'improve access to all parts of our city and our services for people with physical, sensory and learning disabilities; we recognise the value of all people and are keenly aware of stigmatising societal stereotypes that often represent disabled people as 'less than'; identifies and addresses ableism, inaccessibility, and inequity in our service.' Discrimination has occurred here and it is disabled people that notice, we were patronisingly told no discrimination had occurred and the available Complaint procedure was obstructive and worrying. My concern as a disabled resident of Gardner Street: I am a housebound long-term resident of Gardner Street who needs 24 hour vehicular access to/from my front door. There is no other entrance. The vehicles are Enterprise Cars, Medical or Community Transport, taxi and friends/family. The Blue Badge space needs to be re-installed as indicated on the plans (3 hours), so I can return safely to my home. There are likely still two other residents that need this Blue Badge space. I simply became very poorly one day and that was it. It is something that could happen to anyone, no matter how healthy you are. I've included very limited information on my health here as this will be public - and people seem shockingly happy to deny and dismiss my disabilities. I am a registered vulnerable adult and a Blue Badge holder. It is a basic human right to get to medical appointments, dentist/opticians and preventative treatment etc that NHS requires. If I need to get to the bank to prove who I am I can't. I can't predict when I will need such access to/from vehicles. I have mobility, balance and neurological conditions amongst other disabilities and am physically unable to walk/use wheelchairs in street environments. Simply being able to live and access services is always difficult as a disabled person. I am not going to be too emotional here, but the current situation has made things very frightening. I have needed to attend my GP surgery and not been able to. I have not been able to talk through diagnosis directly with my doctor, or press for hospital appointments to be quicker. I've not had new or existing symptoms treated. All the GP's I have talked to cannot believe the diabolical situation (I have personally been told off by a GP who can't understand why the Council voted for this) and even worse they can't believe reasonable adjustments have been refused. It has caused difficulty for At Home services and I have had to explain/apologise profusely - such as when At Home services have had problems carrying all their equipment, I have had physiotherapy sessions cut short and not been able to let Medical Transport know how to enter the street. The GP's PCN Social Prescriber didn't have her emails replied to by the Council when asking about this last issue. I already have a much restricted life. Having limitations on how I can be mobile is devastating - I have not been able get to friends funerals, not able to engage in society and equally others have not been able to get to me if they need vehicles to be mobile. I have had PA/Carers not being able to get to me in their vehicles and deciding not to work here as the situation is unpredictable. PAs worry as they don't know how they are able to do their job properly. The current road restrictions put me at significant disadvantage and risk compared to others. The whole situation for residents needing medical care seems to have not been planned for. I am as much part of this community as everyone else and my (and others) access rights need to be returned. Being a resident, high pedestrian noise levels and a street full of tables: The proposed TRO needs to go through as the noise pollution levels have increased substantially for every day of the week. It only used to be at weekends. Currently it is basically like living in the middle of an outdoor market every day - but without any of the consultation or consideration that a new daily market has to have. It is like some of the cafes have assumed 'rights' to extra road space, pushing as many tables and chairs in as possible. Entertainment venues are forced to consider their noise pollution and their affect on residents, this is not the case for traders and cafés. Having really noisy large cafes and crowds every day of the week in a partly residential road, and an otherwise residential area, is a really invasive and lousy idea. This doesn't make an emotionally sustainable community. This is equally problematic to more intimate premises which encourage in-the-week quieter shopping or working environments. In any warm weather people are sitting down at these large cafes, not moving along the road, and with cafés alcohol licences it gets very loud - whereas if

people are eating inside this goes to buffer noise levels. If this was New Road where it is much wider and cafes are only on one side then noise can dissipate, Gardner Street is narrow and the buildings are three storeys high so the noise reverberates. Some of the eating places are almost 'industrial', getting to be large businesses only because of their expansion into the street (doubling or tripling). I am not sure why this singular use of business premises has been encouraged as Gardner Street is narrow. It feels like cafes have been buying up shops hoping that Licensing will be lax and then presuming 'ownership' of the roadway/pavement. Roadway/pavements are public space - they are not owned by business and are not part of their premises. Brighton was traditionally an eclectic town with a thriving imagination, but feels like it's lost it's way. We have British seaside weather and for the last year there has been so much rain and dankness that for many days the tables/chairs have been empty, piled up or covered in plastic sheets, which makes Gardner Street really unattractive. It's not an inviting environment for tourists to mooch around and buy things. Some traders are really mindful, staying more or less to their premises too, others (a second hand clothes shop) consistently obstructs a drop kerb and treats the roadway as a mini-warehouse. A residents' doorway is continually obscured by display tables. Why is this okay? I don't think such traders are remotely attempting to understand their negative impacts on other people, including residents. Road opening times Friday - Sunday: The road should open earlier than 9pm as the TRO proposes. As a resident having the road open on Friday - Sunday from 6pm onwards (after shops have shut) would be more acceptable. Having the possibility of cafes open till 9pm means high noise levels into the evening for three or more days in a row. Logistically if the road opens at 9pm we miss the beginnings of Komedia 'performances' and hinder being social in Gardner Street venues. It is of business interest to allow disabled people access. The current position on Gardner Street is discriminatory and so does need rectifying. I support the road being opened, although believe this should be for longer than 4 days/week. The proposed TRO is a starting point, but does not offer longer term solutions. Traffic flow was very light on Gardner Street (the one way system being limiting). There have been no vehicular accidents (only cycle and pedestrian). I do think the speed limit could be reduced along the street as it always was a 'slow road' in the day. And, as was found since January too, vans do seem to park up - so maybe finding a workable solution to reduce vans/lorries 'parked up' all day - unless working at a premises, could be found. Being a resident of Gardner Street: A nearby neighbour is in their mid 80's having lived here for 40 years. Most people have lived here between 5 - 20 years. Myself and at least one other housebound person lives on Gardner Street and needs 24hr direct car access to our homes. The new proposed TRO will mean:

- Since January carers/Personal Assistants have found it difficult to do their jobs. The new proposal means disabled people can employ services/individuals that have to use vehicles to do their jobs and at the times they need. This allows for a wider range of PA skills to be accessed. It also means if a Carer/PA finds their disabled employer in 'distress' they know they can get to a medical centre or have At Home services easily attend (as any resident would expect). The current road situation has a negative and lasting impact on Carers/PAs and results in them feeling unable to do their jobs properly or safeguard their clients. Medical Transport could get to our front doors which currently they don't now how to do.
- With the proposed TRO, it would be possible for any resident with a health issue to have a taxi/friend to get them to appointments. Currently the only option if really poorly is to stand at the end of the road and wait. This is equally the same for anyone with a longer term injury and needing a taxi for day-to-day living purposes.
- Having the road closed as it is now every day of the year is much too restrictive for residents. We have basically been asked to permanently re-organise our life around the road closing for businesses, which is unacceptable. Residents whole lives shouldn't be disrupted because some cafes want to put tables/chairs in the road. Weekend activity is very different from weekday activity, we can't make rules for weekdays based on how things function at weekends. The new proposed TRO allows for simple things like residents to get heavy goods/bulky shopping into their homes during the day when shops are actually open or moving house/changing furniture in daylight hours when these activities usually happen.
- Blue Badge holders are not currently able to visit residents of Gardner Street at all, this could be friends or relatives who they never get to see (either because the road is closed, or because of the removal of the Blue Badge spaces). Disabled residents similarly do not get out to see their friends/family or develop friendships and this increases isolation. Since the January changes many people I know who use wheelchairs/electric scooters don't come along

Gardner Steet anymore and so the social isolation increases. It is good having diverse people on our street, I like fellow disabled people being around. The TRO should exempt Christmas, Boxing and New Years Day for the road to stay open: Currently disabled people needing cars or taxi's cannot leave/enter Gardner Street on Christmas, Boxing and New Years Days. This is both for residents and for visitors to residents. The new TRO needs to include an exemption for these bank holidays as the traders are always closed and the road barriers would be open in the morning anyway. The proposed TRO will help disabled people access Gardner Street itself: In Brighton 16,379 people have mobility components for DLA/PIP assessments. There are 13 500 resident Blue Badge holders in Brighton and Hove. This doesn't include visitors or tourists, people employed or having a pension-age benefit-income needing help with mobility etc. Of disabled people that could 'automatically' receive a Blue Badge only around half apply, so we need other provision too such as taxis/community transport or drop off points. Blue Badge spaces are supposed to be where amenities/activity are as this helps us be in the centre of community. With the proposed TRO we will be able to buy goods, go to specialist traders and the optician's. Often a Blue Badge user will carry out several nearby tasks as Gardner Street is an 'all-in-one' environment. Here we can park, have access to friendship and shared activity/culture - before January it was a place where people had come for years and was part of a safe routine. This TRO would help recreate some equity with how non-disabled people organise their lives. As most Blue Badge holders are assessed by being unable to walk over 50m it was obvious Regent Street was too far away to park. When Gardner Street is open currently, the full length of the road is for continuous loading and unloading only. The proposed TRO also partly redresses the strange situation of being told that disabled drivers would be able to use Gardner Street outside of the current hours of 11am - 5:00pm, but the removal of Gardner Streets two Blue Badge spaces then made this impossible to park and use the street at all. This incongruity belongs to the same 'group- think' that generated the unsound Equalities Impact Assessment - and indicates a lack of inter-department thinking regarding disability and mobility. The proposed TRO needs to bring back more than one Blue Badge space: Ideally there would be more than the two Blue Badge spaces reinstated as Loading Bays can be used only for 'pre-ordering'. Most Blue Badge holders are only able to walk from 0 - 50 metres, having at least both Blue Badges spaces means there's one at each end. The reasons why they were placed there originally haven't changed. The Blue Badge space indicated is near Infinity foods, The Dorset and other cafes are close, the bay is near both opticians and equally will serve myself, disabled people and residents at this end of Street. The other Blue Badge space once served the Komedia/South end. The Komedia's building (venue, cinema and restaurant) are all fully accessible - so to not have a Blue Badge space directly outside makes a mockery of the Komedia's 'accessibility status'. I know a number of people that have turned up believing the Blue Badge space is there and have had to go home immediately. This does not make for a welcoming Accessible City. Further, I would say all venues that are fully accessible should have Blue Badge space outside their main entrance. The proposed TRO needs to include drop off points to help those without Blue Badges: Drop off points on the street when it is open and at the ends if possible when closed would allow disabled people using taxis (or friends/family/community vehicles) to facilitate their own mobility directly from door to destination. Other issues the TRO processes have brought up (as TRO's consultations need to be accessible):

- BHCC and [REDACTED] discussion/giving feedback/resolving issues, why not use them more. They need to be involved from the start of any process and then continuously consulted.
- BHCC could outline a well thought-through advocacy route for older or disabled people and 'not-heard-from' groups to comment. This could help those unable to comment due to disability, feeling alienated, not understanding the process or not wishing to put in the public domain specific personal/medical situations. The advocacy route could de-personalise comments and maybe give numbers of people concerned. The Accessible City Strategy states: 'If diverse voices do not have equal power in accessing the council or key spaces/groups, it is critical to intentionally include and diversify any groups the council creates and ensure we are reaching out and working to platform diverse voices.'
- State example's of the reasonable adjustments available e.g. be able to copy/paste/add in an extra comment; say you're poorly and have one very short comment; to put in group comments from discussions and still be counted as an individuals; having group comments if people aren't able to write. It needs to be recognised - people aren't all able to use digital media or social media, mobile phones, have



access to computers; some people need others to help them and the short time period can make this impossible; need others to interpret if someone doesn't use written or spoken words as part of their language. BHCC needs to realise age or disability is a real lived situation and as a group we are unable act as non-disabled people can, and not recognising this is ableism and disablism. Mobility is a vital practical and ethical issue and road/pavement/transport issues massively affect us. Many of us get repeatedly left out of all such conversations. • BHCC word's need to always endorse the desire and need to have disabled people within every aspect of our city. BHCC could publicly state that there will always be a percentage of Brighton's population that need access to and use privately owned vehicles in all parts of the city - and that this is necessary to an equitable society, it's not 'an added-on option'. • There is no traffic/mobility strategy concerning mobility-disabled people for the city (let alone in the North Laine). Bit-by-bit individual decisions are taken that severely affect older or disabled peoples mobility - whether this is road, pavement or business use of public space. These decisions tend to favour non-mobility-disabled people/people that are not older citizens. As mobility-disabled people are the amongst the most disproportionately negatively effected why aren't we being designed in, we need to be named in the cities reports. There isn't the data on us, and especially for housebound or bedbound people. We aren't placed in the administrative and strategic environment where we have the moral and legal opportunity to be considered as everyone else. We need vehicles as mobility aids. • For the Accessible City Strategy to provide a clear and consistent mechanism to connect BHCC departments of Traffic/Highways and Disability Inclusion Officers. Equality Impact Assessment's need to be used as a proper tool for investigating a situation, finding solutions and they need to be reviewed and signed off properly. • Provide a clear mechanism for disabled people/carers/friends to tell BHCC about the failure of road changes. The Formal Complaint process is unnecessarily gruelling, punishing and obstructive. BHCC need to acknowledge that they are in a position of power and should not be leaning on this power when receiving criticism. There needs to be a simple advertised feedback process - not through local councillors or other hierarchical procedures - where residents can easily let BHCC know that changes have made a mess of their lives. BHCC need to listen, act responsibly and not be dismissive.

## Object

Gardner Street is a narrow pedestrian-centred shopping and cafe street. It's much nicer without cars driving down it and parked there. Cafes could start putting tables out on the street!



Object	The current street prohibits motor traffic and should be maintained as such. With improved design there could be better access for those using wheeled access eg wheelchairs, pushchairs and bikes as well as allowing space for cafes to put out tables and chairs. There could also be limited vehicular use every morning, but having vehicular use for several days a week would be a retrograde step and discourage locals and tourists using the street and businesses being supported.
Support	Keep the road free from cars for as much as possible. Business can use the road for stalls, chairs and tables, and so on.
Support	I am in support of the reopening of Gardner Street for Mondays - Thursdays. This means that a disabled resident will be able to get to their medical appointments and leave and return to their home on these days at least. Please can you add another disabled parking bay further along the street for me to use. A drop off/pick up point would also be helpful as sometimes disabled people use a taxi or are dropped off by someone else and they need to be dropped off outside their destination. I would at the very least like to be able to access Gardner Street during the evenings if I'm not able to during the daytime on the Friday, Saturday Sunday or Bank Holidays. If the road doesn't open until 9pm that will stop me from being able to enjoy Gardner Street in the same way as others can. I'd like to be able to meet friends for an early evening meal. For this reason, a 5pm or a 7pm at the latest reopen would be a more acceptable compromise. Please will you make an exception for Christmas Day and Boxing Day so that the road can remain open, so that the disabled resident can be collected, and enjoy this special time with their family or friends. When the road is closed, It is important that bicycles and scooters don't use this road and come into conflict with people. During the periods of closure, please will you improve enforcement, so that uninterrupted pavement access and dropped kerbs (which need improvement as they're not safe for wheelchair users) can be kept properly free of tables, chairs or traders racks and stands. Thank you.
Object	This road is a key part of the network for people who ride or would like to ride bicycles in the city centre. It's vital to retain passage for these people on bicycles 24/7 so that they can ride safely and easily through North Laine. There is no publicly-owned and managed route nearby that permits people riding bicycles to travel south from North Road to Church Street. The only other possible low-motor traffic route is via Jubilee Street which is neither publicly owned nor managed. Therefore this TRO should not affect all vehicles and should be amended to only prohibit driving. Otherwise it would be increasing the danger of serious injury to people who ride bicycles by requiring them to find routes that are more hazardous as they carry much higher volumes of motor traffic. It is a significant safety issue so this TRO cannot be permitted to progress.

Object	<p>I strongly object to the closure of Gardner Street to vehicles until 9pm and see no reason for the road to be closed between 6pm-9pm. As a resident, this would be extremely inconvenient and the only beneficiary of this change would be The Dorset pub as all the shops and cafes close at 6pm. This is an excessive restriction for residents that benefits so few. I understand that the disabled person's freedoms are currently limited due to the present restrictions but this does not seem like a sensible solution - they may well gain some freedom during the week but at the weekend they would be even more limited in their ability to leave the house. I have no objection to the road being closed to vehicles between 11am-6pm but these added hours in the evening are completely unnecessary.</p>
Object	<p>I've been running a Cafe for over 10 years and after consulting with customers and other traders in the street, they all agree that it's much better to leave the street closed during the week. From the customers: Most think it's confusing to have some days open and others closed, also dangerous because customers will walk in the street regardless. They also prefer the cafe life style that they would expect in the North Laines area, they say it doesn't make sense to close the street during the week. From the Traders: This has been the most difficult last few years for everyone, especially small businesses. The street being close all week has been a life line to us. Lots of them are holding on hoping to make it through the coming winter and the extra trading the street closures has given us, has been vital. Please revisit this plan because there are other options, for example leaving the loading bays clear from North Road end to the bike bays, that would give access 24 hrs a day to anyone that end of the street.</p>

## Equality Impact and Outcome Assessment (EIA) Template - 2019

**EIAs make services better for everyone and support value for money by getting services right first time.**

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups<sup>2</sup>. They help us make good decisions and evidence how we have reached these decisions<sup>3</sup>.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age<sup>13</sup>) or use the hyperlinks ('Ctrl' key and left click).

**For further support or advice please contact:**

- BHCC: Communities, Equality and Third Sector Service, EDI Team – email: [Equalities@Brighton-Hove.gov.uk](mailto:Equalities@Brighton-Hove.gov.uk)
- CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)

### 1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed<sup>4</sup>.

<b>Title of EIA<sup>5</sup></b>	Gardner Street Traffic Regulation Order	<b>ID No.<sup>6</sup></b>	EEC57
<b>Team/Department<sup>7</sup></b>	Traffic management, Transport		
<b>Focus of EIA<sup>8</sup></b>	<p>Following a petition received and presented to the Environment, Transport and Sustainability (ETS) committee, the businesses of Gardner Street requested a change of hours on the current road closure every day, they have requested more space to install tables and chairs for their customers. Alongside this and more importantly a disabled resident with a blue badge has been made housebound from the current restrictions in place which is preventing them from attending essential appointments and carrying out daily routines.</p> <p>The advertised Traffic Regulation Order (TRO) will:</p> <ul style="list-style-type: none"> <li>• Amend the current road closure in place which operates 11am – 5pm, The new proposed road closure to all vehicles including cyclists will operate Fri – Sun and Bank holidays 11 am – 9 pm. These proposed times have been informed by discussion with the businesses and the disabled resident to seek an adjustment that appropriately balances the positive and negative impacts of</li> </ul>		

the change on all stakeholder (the timings will also be subject to comments received via the TRO formal consultation).

- Reintroduce a time limited disabled bay for blue badge holders on Gardner Street to utilise during the unrestricted hours. The 11 disabled bays from recently implemented from the previous TRO will remain in Regent Street plus one personal Disabled Parking Bay (location?). This is to facilitate blue badge holders to access the local amenities.

During the pandemic special measures were implemented in Gardner Steet which allowed blue badge holders access at all times via an Experimental Traffic Regulation Order (ETRO), this was possible due to limited tables and chairs installed in the carriageway for the businesses due to social distancing measures. Since social distancing measures have been lifted, the volume of customers is too great to allow blue badge access during the road closure, when the ETRO expired it was also highlighted that there were issues for blue badge holders who were unsure how to access the street and disabled bays being obscured by tables and chairs, the street was reverted to its previous restriction that was in place for over 10 years ( Fri – Sun and bank holidays 11-5 pm) ,

In addition to this there is a concern for road safety having vehicles enter a closed road with customers using the seating installed in the carriageway, making it impractical to protect pedestrians and wheelchair users if a vehicle required access.

## 2. Update on previous EIA and outcomes of previous actions<sup>9</sup>

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
11 time-limited disabled bays were created in Regent Street for blue badge holders to visit the local amenities, this was a 450% increase on the previous disabled bay provision.	The disabled bays are in continuous use by blue badge holders on a daily basis, this shows the initial concerns of them not being accessible to many have been addressed, but not for the housebound resident.	Continue to monitor the use of the bays, to ensure they are not being abused by non-blue badge holders.  Review demographic data at ward or where possible lower super output area (LSOA) to compare city-data with local neighbourhood data to check for any disproportionate impacts by protected characteristics of each ward.

## 3. Review of information, equality analysis and potential actions

Groups to assess	What do you know <sup>10</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>11</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>12</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>13</sup> ? All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<b>Age<sup>14</sup></b>	Brighton & Hove has a resident population of 276,300 people. Including; <ul style="list-style-type: none"> <li>- 41,600 children aged 0 to 15 years.</li> <li>- 200,100 working age adults aged 16 to 66.</li> <li>- 34,600 older people aged over 66.</li> </ul> An estimated 8.6% of	Commenting online for the TRO isn't accessible for all, especially those without access to email platforms.	Accessibility needs to be significantly improved to provide more than one way for residents to provide comments on TROs, with inclusive adjustments for time-frame provided for those who are older, disabled and have English as an additional language.	We currently advise that comments can be made to the proposed TRO via the online portal, email or letters sent to the TRO team at Hove Town Hall.  Offer support to those with low digital skills by promoting initiatives to increase Digital Inclusion such as Good Things Foundation, Citizen's online and Age UK's phone based digital support.  Get customer satisfaction data

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>adult population in Brighton and Hove have either never used the internet or have not used it within the last three months.</p> <p>An estimated 16% of the adult population in Brighton and Hove lack the five 'Basic Digital Skills' (Managing information; Communicating; Transacting; Problem-solving; and creating).</p> <p>See additional action identified in section 2 of this EIA.</p>			<p>from different age groups and engage with age-related community groups to learn about their barriers and ideas for solutions/mitigations.</p>
<b>Disability<sup>15</sup></b>	<p>51,000 (22%) of adults in the city have two or more long term health conditions</p> <p>19,000 (8%) of adults in the city have mental and physical disabilities</p> <p>There are c.13,500 blue badge holders in the city</p>	<p>The current road closure prevents access to all vehicles during the hours 11am – 5pm everyday. This includes visitors, residents and blue badge holders.</p> <p>The new proposed hours Fri - Sun and bank holidays 11am - 9 pm will allow residents</p>	<p>Disabled residents have stated that they have been unable to leave home without direct access to a Disabled Parking Bay.</p> <p>Some disabled visitors and blue badge holders to the street have advised that they enjoy using the street during the restricted hours, the lack</p>	<p>Reinstate a time limited disabled bay for general blue badge holder use outside restricted hours. This will enable the resident to utilise the space for appointments and day to day tasks out of the restricted hours.</p> <p>This would ensure access for blue badge holders to use the disabled bay and access would not be impeded.</p>

Groups to assess	What do you know <sup>10</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>11</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>12</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>13</sup> ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>There are c. 6,900 disabled concessionary bus pass holders in the city.</p> <p>More than one in 20 residents say their day-to-day activities are 'limited a lot' due to a long-term health problem or being disabled.</p> <p>The resident of Gardner Street does not qualify for a disabled bay under the current council policy, due to not having a vehicle registered to their address.</p> <p>See additional action identified in section 2 of this EIA.</p>	<p>with blue badges to make use of the time limited disabled bay outside the hours of restriction. This will also allow the affected resident to attend personal appointments during the unrestricted hours.</p> <p>Network changes can be confusing and need to be communicated clearly to all considering neurodivergence. Flat surfaces and dropped kerbs are important and more accessible for all people, especially those using mobility aids</p> <p>Signage and barriers need to be more inclusively and accessibly designed to enable all people, especially those who are older, living with sight loss or visual</p>	<p>of motor vehicles makes their experience more enjoyable and easier to access the amenities, it also allows those who require them to use the dropped kerbs to access either side of the street with ease.</p> <p>If interventions are not designed and operated with an inclusive design mindset, they can affect everybody's safety and ability to navigate the environment, especially those who are disabled, parents with children, pregnant people, wheelchair users, those with different mobility requirements.</p> <p>Disabled people are currently not provided the same level of information and are disproportionately impacted.</p> <p>Obstructions on the highway and footway and</p>	<p>Engage with local disability groups to update them on changes to the network. Network changes need to be communicated clearly and more accessibly to all considering neurodivergence, older, those experiencing sight loss and/ or visual difficulties and English as an additional language.</p> <p>Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		<p>difficulties to see changes and be able to navigate safely.</p> <p>Some disabled people have carers visiting them at home, need a car and additional mobility aids to enable them to live a basic quality of life, and need to park nearby.</p> <p>Limited access to disabled bays.</p>	<p>the condition of the pavements/roads put disabled road users disproportionately at greater risk.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others can assist disabled people.</p> <p>As per all our gated streets, the emergency services have keys to open these if they require access. Emergency services have advised on streets such as this they advise they would use other methods to access a member of public .</p>	
<b>Gender reassignment<sup>16</sup></b>	7.21% of people aged 16 years and over in Brighton and Hove identify as a different gender than that registered at birth.	No disproportionate impact identified due to lack of specific data and no specific consultation with this	There may be a potential impact for disabled trans/non-binary people not being able to access events in the area, including at The Komedia.	The Komedia have disabled access via Regent Street, additional disabled bays have been provided so the events are more accessible for those with blue badges. There may be impacts for other venues in the



<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
	<p>Statistics are not available for those under 16.</p> <p>See additional action identified in section 2 of this EIA.</p>	population cohort.		<p>area.</p> <p>Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.</p>
<b>Pregnancy and maternity<sup>17</sup></b>	<p>There are estimated to be 64,300 women of childbearing (aged 15-44 years) resident in the city.</p> <p>See additional action identified in section 2 of this EIA.</p>	Disproportionate levels of difficulty created for pregnant people and those with buggies, wheelchair users, older people with wheel-based mobility aids to navigate the street	<p>Barriers created cross the road easily/ obscured by tables and chairs.</p> <p>If interventions are not designed and operated with an inclusive design mindset, they can affect everybody's safety and ability to navigate the environment, especially those who are disabled, parents with children, pregnant people, wheelchair users, those with different mobility requirements.</p>	<p>Additional dropped kerbs will be installed for pushchairs, those using mobility aids, and wheelchair users to utilise the open space more accessibly.</p> <p>Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.</p>
<b>Race/ethnicity<sup>18</sup></b> Including migrants, refugees, and asylum seekers	19.5% of the city's population are from Black and Racially Minoritised groups, 80.5% are White British.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	Information on network and access changes may not be fully accessible for people who have English as an additional language or have different levels of	Share information about the transport changes with local groups for wider dissemination to different communities, especially those with English as an additional language as they are

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
	<p>8.3% of the population do not speak English as their preferred or first language.</p> <p>See additional action identified in section 2 of this EIA.</p>		<p>literacy and English skills.</p> <p>Lived experiences of people with Black and Racially Minoritised backgrounds are often under-represented in engagements and consultations so we have limited knowledge of disproportionate impacts, especially where disability is an intersection.</p>	<p>disproportionately impacted in terms of awareness and impact.</p> <p>Improve and conduct comprehensive and timely consultation with under-represented people from across protected characteristics.</p> <p>Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.</p>
<b>Religion or belief<sup>19</sup></b>	<p>There is no data to suggest this group is affected by this change.</p> <p>See additional action identified in section 2 of this EIA.</p>	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.
<b>Sex/Gender<sup>20</sup></b>	In 2021 there was estimated to be 141,000 female (51%) and 135,400 male (49%) and residents in the city.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
<b>Sexual orientation<sup>21</sup></b>	<p>Around 189,745 people (80.6%) identified as straight or heterosexual.</p> <p>Around 25,247 people (10.6%) identified with an LGB+ orientation.</p> <p>The remaining 20,375 people (8.7%) did not answer the question.</p> <p>The proportion of residents aged 16 and over in Brighton &amp; Hove identifying with an LGB+ orientation (10.6%) is three time higher than seen in both the South East (3.1%) and England (3.1%).</p> <p>The proportion of residents aged 16 and over in Brighton &amp; Hove identifying with an LGB+ orientation (10.6%) is the highest proportion seen in any upper tier authority in England.</p>	<p>Unable to access disabled bays for the Komedia when the road is closed. We are unaware of access limitations for any other venues where this population cohort may also be disproportionately impacted.</p>	<p>Unable to attend cultural shows/ films/ events at relevant venues of choice in the area.</p> <p>There may be a potential disproportionate impact for disabled LGBTQIA+ people not being able to access events and venues in the area, especially those held at the Komedia.</p>	<p>The Komedia have disabled access via Regent Street, additional disabled bays have been provided so the events at this location are more accessible for those with blue badges.</p> <p>Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
	See additional action identified in section 2 of this EIA.			
<b>Marriage and civil partnership<sup>22</sup></b>	Only a third of Brighton & Hove residents (33%, 77,241 people) aged 16 or older are married or in a civil partnership.  See additional action identified in section 2 of this EIA.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.
<b>Community Cohesion<sup>23</sup></b>	Disability groups, Cycling groups, and Environmental activists.  See additional action identified in section 2 of this EIA.	Disability groups and Cycling groups require the street to be accessible at all times.  Environmental activists wish for the road to be closed to ensure better air quality and improved city centre.	The road will need to remain open, and no table and chairs would be able to be installed on the highway. This would be against the wishes of many businesses, some residents and some road users.  The resident who holds a blue badge would continue to be housebound affecting their quality of life. This could also impact other blue badge holders	Review comments received to the TRO.  Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			looking to visit the area.	
<b>Other relevant groups<sup>24</sup></b>	No other relevant groups identified based on the area statistics.  See additional action identified in section 2 of this EIA.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.
<b>Cumulative impact<sup>25</sup></b>	No cumulative impacts identified based on the area statistics.  See additional action identified in section 2 of this EIA.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	No disproportionate impact identified due to lack of specific data and no specific consultation with this population cohort.	Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.
<b>Assessment of overall impacts and any further recommendations<sup>26</sup></b>				
<p>The proposed road closure Fri – Sun and Bank holiday 11 – 9pm will restrict access to any Blue Badge holders who cannot travel the 50m+ from the current bays to the nearest bays in Regent Street. Many blue badge holders have commented that they cannot gain access to the Komedia for showings and events; The Komedia have made provisions to make the event space accessible for all and has rear disabled access allowing blue badge holders to utilise those spaces in Regent Street. The council have worked closely with businesses and traders to ensure the dropped kerbs are clear of tables and chairs at all times, and this is monitored by an enforcement officer on a regular basis.</p> <p>The advertised TRO has a 21-day consultation period where the public can comment to these proposals, it was also sent to key stakeholders with includes emergency services &amp; disability groups. This was also advertised online and via social media platforms. A hard copy of the TRO notice was also hand delivered to the residents and business of Gardner Street.</p> <p>Generally, local businesses are supportive of the proposed TRO.</p>				

Groups to assess	What do you know <sup>10</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>11</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>12</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>13</sup> ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
<p>The Leader, Chair of the Transport Committee, and the Chair of the Equalities and Human rights Committee have liaised with the impacted disabled resident on Gardner Street and have assured that she is ok with the proposed TRO as a compromise.</p>				

#### 4. List detailed cu and/or community feedback that informed your EIA

<b>Title</b> (of data, research, or engagement)	<b>Date</b>	<b>Gaps in data</b>	<b>Actions to fill these gaps: who else do you need to engage with?</b> (add these to the Action Plan below, with a timeframe)
Meeting with the local businesses and stakeholders, ward councillors and businesses and disabled residents.	18 <sup>th</sup> July 23	N/A	N/A
We need to acknowledge the limits and impact of not having an equalities breakdown of consultation responses and investigate how future consultations can gather and analyse equalities data so that we can better understand how proposals will impact on people with protected characteristics.	TBC	Equalities data	Further engagement to be undertaken with the Traffic Regulation Order team, data protection, information, and governance team, and our legal department to address actions and comments in Section 2 of this EIA.
Feedback from Traffic regulation comments received	1 <sup>st</sup> September 23	N/A	N/A
Census 2021 data	August 23	N/A	N/A
Current BHCC Corporate Plan	2023	N/A	N/A
Developing a new transport plan for Brighton & Hove, BHCC	2021	N/A	N/A

## 5. Prioritised Action Plan<sup>27</sup>

Impact identified and group(s) affected	Action(s) planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
Blue badge holders	Continue to monitor the use of the bays, to ensure they are not being abused by non-blue badge holders.	Bays be kept clear for blue badge holders	No complaints, bays to be utilised are accessible	Ongoing, duration of TRO
All	Review demographic data at ward or where possible lower super output area (LSOA) to compare city-data with local neighbourhood data to check for any disproportionate impacts by protected characteristics of each ward.	Data reviewed and cross-checked with ward and LSOA data.	Data insights developed and reviewed for impact as part of post-implementation TRO monitoring.	Ongoing, duration of TRO
All	Continuously collect feedback post implementation, reviewing and monitoring it to inform any future TRO amendments, and to ensure continued accessibility.	Feedback collected, reviewed, and relevant actions implemented, or gaps addressed.	Report of review and monitoring produced and shared as part of performance monitoring.	Ongoing, duration of TRO and post-implementation
All, especially Age	Offer support to those with low digital skills by sharing initiatives to increase Digital Inclusion such as Good Things Foundation, Citizen's online and Age UK's phone based digital support.  Get customer satisfaction data from different age groups and engage with age-related community groups to learn about their barriers and ideas for solutions/mitigations.	Residents have increased awareness of additional places of digital support and services.  Customer satisfaction data received, and impact analysed.	Future data schemes are informed by more robust and diverse intersectional customer feedback across all protected characteristics.	Ongoing, duration of TRO and post-implementation



Disability, Disabled LGBTQIA+ people, Pregnant people, Wheelchair, and mobility aid users	Additional dropped kerbs will be installed for pushchairs, those using mobility aids, and wheelchair users to utilise the open space more accessibly.	Dropped curbs have been installed as identified and intended.	Future data schemes are informed by more robust and diverse intersectional disabled customer feedback across all protected characteristics.	Ongoing, duration of TRO and post-implementation
All, team/ wider learning action	Review the accessibility of communications to residents about network change information and share information about the transport changes with local groups for wider dissemination to different communities, especially those with English as an additional language as they are disproportionately impacted in terms of awareness and impact.	Easily understood communication for all residents.  Diverse residents across various communities of identities are reached and informed intentionally.	Customer feedback and monitoring reports	Within 2 years post-implementation of revised Gardner Street TRO
Race/ Ethnicity intersecting with disability, LGBTQIA+, disability, faith.	Improve and conduct comprehensive and timely consultation with under-represented people from across protected characteristics.	Feedback from under-represented groups collected and used to inform future network changes	Feedback mechanism and strong consultation links established with all diverse communities of identities.	Within 2 years post-implementation of revised Gardner Street TRO
All, team/ wider learning action	Review the consultation process and equalities data monitoring requirement and impacts of data gaps so that we can better understand how proposals will impact on different people with protected characteristics and intersections of identities.	Further engagement undertaken with the Traffic Regulation Order team, data protection, information, and governance team, and our legal department.	Have an equality monitoring data collection approach.  Internal engagement completed and results of review implemented.	Within 2 years post-implementation of revised Gardner Street TRO

**EIA sign-off:** (for the EIA to be final an email must be sent from the relevant people agreeing it or this section must be signed)

**Staff member completing Equality Impact Assessment:** Russell McMillian, Senior Traffic Engineer & David Fisher, Highway Regulation Manager

**Date:** 06-Sep-23

**Directorate Management Team rep or Head of Service/Commissioning:** Andrew Westwood, Head of Traffic Management

**Date:** 06-Sep-23

**CCG or BHCC Equality lead:** Sabah Holmes (Equality, Diversity, and Inclusion (EDI) Manager)

**Date:** 11-Sep-23

## Guidance end-notes

<sup>1</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

### <sup>2</sup> Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people in relation to their 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

**The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:**

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
  - Remove or minimise disadvantages suffered by people due to their protected characteristics
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
  - Tackle prejudice

- 
- Promote understanding

<sup>3</sup> EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

<sup>4</sup> **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

**Do you need to complete an EIA?** Consider:

- Is the policy, decision or service likely to be relevant to a specific group or groups (eg: older people)?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

<sup>5</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

<sup>6</sup> **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

<sup>7</sup> **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

<sup>8</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>9</sup> **Previous actions:** If there is no previous EIA or this assessment is of a new service, then simply write 'not applicable'.

<sup>10</sup> **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?<sup>10</sup>
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#> ) and national ones where they are relevant.

<sup>11</sup> **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
  - (a) consult when proposals are still at a formative stage;

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- (b) explain what is proposed and why, to allow intelligent consideration and response;
  - (c) allow enough time for consultation;
  - (d) make sure what people tell you is properly considered in the final decision.
  - Try to consult in ways that ensure all perspectives can be considered.
  - Identify any gaps in who has been consulted and identify ways to address this.

<sup>12</sup> Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
  - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
  - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  - If there is negative differential impact, how can you minimise that while taking into account your overall aims
  - Do the effects amount to unlawful discrimination? If so the plan must be modified.
  - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

<sup>13</sup> Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

<sup>14</sup> **Age:** People of all ages

<sup>15</sup> **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

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<sup>16</sup> **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

<sup>17</sup> **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

<sup>18</sup> **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

<sup>19</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

<sup>20</sup> **Sex/Gender:** Both men and women are covered under the Act.

<sup>21</sup> **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

<sup>22</sup> **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

<sup>23</sup> **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

<sup>24</sup> **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

<sup>25</sup> **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

<sup>26</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

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<sup>27</sup> **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.