Brighton & Hove City Council

PLACE OVERVIEW & SCRUTINY ADDENDUM

6.00PM, TUESDAY, 6 OCTOBER 2026

HOVE TOWN HALL COUNCIL CHAMBER

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Subject: Deputations from members of the public

Date: 6th October 2026

A period of not more than fifteen minutes shall be allowed at each ordinary meeting of the committee for the hearing of deputations from members of the public. Each deputation may be heard for a maximum of five minutes following which the committee Chair shall speak in response. It shall then be moved by the Chair and voted on without discussion that the spokesperson for the deputation be thanked for attending and its subject matter noted.

One deputation has been received for the 6th October 2026 call-in meeting. The spokesperson is entitled to speak for 5 minutes.

1 Subject of Deputation

Red Route on Western Road

2 Supported by

Catherine Lane

James Rock

Alison Connor

Marie Dhont,

Bee McKeevar

Rachel Davidson

Dean Davidson

3 Summary of deputation

"Fines after fines after fines."

These are the words of Azem Gashi. He was talking about Archipelagos Gyros, his restaurant on Lewes Road, after the Red Route came. He says he lost between 20 to 30% of his turnover. A few people lost their jobs. Azem also owns two restaurants on Western Road. Today he does not know whether they can survive a Red Route there.

Paul Sankey was a butcher on Lewes Road for 14 years. He says that when the red lines came, his takings fell and suppliers refused to deliver. He says that is why he lost his business. He went bankrupt.

Amir Khan's family has run Taj on Western Road for three generations. Their shop on London Road is gone. Amir says the Red Route there contributed directly to its closure.

Those are three voices. We have heard many more, and we can put every one of them before you.

Now a Red Route is coming to Western Road, and to 185 businesses.

Once was a lesson. Twice would be a choice. Why has the decision making process completely failed to include a consideration of the inevitable economic impact? The loss of jobs? Why apply the most drastic parking enforcement option, when the Cabinet report never weighed anything less?

On 17th September, Cabinet resolved that the purpose of this scheme is "to reduce congestion in the area to allow for improved bus reliability." We share that aim. Nobody on Western Road defends illegal parking. We want the rules enforced. The report records 2,315 vehicles that drove away before a ticket could be issued. That grace period exists because loading is allowed on yellow lines. The report does not say how many of those drivers were simply making a delivery or collecting something heavy. A Red Route would ban that too.

Section 4 of the report sets out the alternatives Cabinet considered. There are only two: do nothing, or make the scheme permanent from the start. Stronger enforcement is not among them. Nor are clearer kerbside markings to prevent loading in any particular locations where congestion is an issue. The lightest tools were never weighed. The heaviest is being reached for first.

The traders would welcome working with the council on any other solution except double red lines and 24 hour camera enforcement.

Unlike some other Red Routes, Western Road has no rear access. This scheme gives us ten loading bays, for nearly a kilometre of shopfront. The report says some businesses will be around 70 metres from the nearest bay.

Health and safety guidance flags carrying goods more than 10 metres as a risk. The Brewery Logistics Group, whose members deliver to pubs and bars on this street, has said. Kegs weigh up to 200 kilograms. It says this scheme leaves its drivers with "an impossible choice": obey the Red Route and breach health and safety rules, or obey those rules and get a fine. In its words: "This is not a theoretical concern. It is an operational certainty."

Section 122 of the Road Traffic Regulation Act requires the council to have regard to reasonable access to premises. Seventy metres, carrying a side of meat or a barrel of beer, is not reasonable access.

Members, Red Routes have a cost, and we know who pays it.

The British Heart Foundation shop on Lewes Road tells us its profits fell from £75,000 a year to £35,000. People bringing furniture to donate to a heart charity were fined £70 for stopping outside. That shop is now closing.

We are told this is an 'experiment'. A shop that has closed as the result of an experiment stays closed. Ask Paul. Ask Amir.

We believe a Red Route will close many of the 185 businesses on Western Road. Please do not carry out a live experiment on the jobs of everyone who works on this street without first trying everything else. These are real people. Some will lose everything.

Please send the decision back. That is not a vote against your colleagues in Cabinet. It gives them the chance to get this right.

This council's own plan says: "We continue to listen closely to our city's residents and businesses." Today, we are asking you to listen. Western Road is now closed for resurfacing. No Red Route can operate there until it reopens, so a pause costs the city nothing. Let us use that time well. The traders of Western Road will work with you and share our trading figures to show the impact of no kerbside stopping caused by the roadworks, so that the council can carry out the economic impact assessment the Chamber of Commerce and BIDs have asked for before deciding to implement this scheme.

Subject: Deputations from members of the public

Date: 6th October 2026

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1 Subject of Deputation

SPEECH IN SUPPORT OF THE PLANNED RED ROUTE ALONG WESTERN ROAD

2 Supported by

Nigel Perkins

Peter Elvidge

Alec Horner

Graham Mulliner

Suzie Kitson

Stephen Thomas

David Nash

3 Summary of deputation

Due to the Climate Emergency that we all face, it is even more important that we take all possible steps to encourage means of transport which have the lowest carbon emissions created per person per kilometre travelled.

Buses have a much lower impact on the environment in terms of carbon emissions per kilometre travelled per person. Red Routes always help to make bus services more efficient and hence more attractive to the travelling public.

As the Red Route is subject to an Experimental Traffic Order, the Council will be able to make changes before it is made permanent. Following a 6 week consultation period, closing on 4th January 2026, residents and businesses were able to make their views known. Feedback from the consultation confirmed that there was significant support for the plan. The Council also made changes to the number of loading bays and disabled parking spaces in response to the feedback.

As with the 2 other Red Routes, we are confident that the Council will continue to deal with the concerns of residents and businesses before they are made permanent.

It would be a terrible shame to lose this opportunity of a Red Route just when the road has finally been re-surfaced. We believe that the Council complied with established procedures before the cabinet made the decision to introduce a red route along part of Western Road.

Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 28

Subject: **Call-in: Update report on Western Road Resurfacing Works and Red Route**

Date of meeting: **6th October 2026, 5.30pm**

Report of: **Chair of Place Overview & Scrutiny Committee**

Contact Officer: **Name: Natalie Sacks-Hammond**

Email: Natalie.sacks-hammond@brighton-hove.gov.uk

Ward(s) affected: Brunswick & Adelaide; Regency;

Key Decision: No

For general release

Note: Urgency

By reason of the special circumstances below, and in accordance with section 100B(4)(b) of the 1972 Act, the Chair of the meeting has been consulted and is of the opinion that this item should be considered at the meeting as a matter of urgency.

Note: Reasons for urgency

The special circumstances for non-compliance with Part 3E - Access to Information Procedure Rule 6 and Section 100B(4) of the Local Government Act 1972 (as amended) were that the matter required determination within 7 working days and it was not reasonably practicable to give five clear working days' notice. The meeting was therefore convened at shorter notice in accordance with Rule 6.2, with agenda and reports made available from the time of convening.

1. Purpose of the report and policy context

1.1 To set out the call-in request and relevant supporting material in relation to a decision taken by Cabinet on 17th September 2026 on Item 57 Update Report on Western Road Resurfacing Works and Red Route

2. Recommendations

Having regard to the grounds for call-in and the information supplied in response:

2.1 To determine that the challenge to the decision called-in should be taken no further and the decision may be implemented; or

2.2 To determine that the decision called-in is contrary to the policy framework or contrary to or not wholly in accordance with the budget framework and that it should therefore be referred to full Council. In such a case the Committee must set out the nature of its concern to full Council; or

2.3 To refer the decision called-in back to Cabinet for reconsideration. In such a case the Overview & Scrutiny Committee must set out the nature of its concerns for Cabinet.

3. Context and background information

3.1 Part 3C1 of the Council's Constitution (Overview and Scrutiny Procedure Rules) includes a procedure under which decisions taken by Cabinet may be "called-in" for further consideration.

3.2 The decision called-in is the decision made by Cabinet on 17th September 2026 in relation to Item 57 Update Report on Western Road Resurfacing Works and Red Route. A copy of the decision notice is attached as Appendix 9. An extract of the draft minutes of the Cabinet meeting held on 17th September 2026 is attached as Appendix 8.

3.3 The decision has been called in by Councillors Ollie Sykes (Green), Marina Lademacher (Green), Pete West (Green), Steve Davis (Green), Ellen McLeay (Green), Bruno De Oliveira (Green), Chloe Goldsmith (Green), Alistair McNair (Conservative), Anne Meadows (Conservative), Carol Theobald (Conservative), Emma Hogan (Conservative), Ivan Lyons (Conservative), Mark Earthey (Brighton & Hove Independent Party) and Sameer Bagaeen (Independent). The Call-in notice setting out the grounds for call-in is attached as Appendix 10.

4. Call-in Procedure

4.1 Call-in is the process by which an Overview & Scrutiny Committee can recommend that a decision made (in connection with Executive functions) but not yet implemented be reconsidered by the body which originally took the decision.

4.2 Call-in may only be used where one of the following grounds has been given as a reason for call-in:

- insufficient consultation with stakeholders prior to the decision;
- the absence of sufficient evidence on which to base a decision;
- the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework;
- the action is not proportionate to the desired outcome;
- a potential human rights challenge, failure to consider the public sector equality duty or not in accordance with or which undermines the Council's corporate parenting responsibilities; 8
- insufficient consideration of legal and financial advice;
- the decision was a key decision and not labelled as such

4.3 An Overview & Scrutiny Committee examining a decision which has been called-in does not have the option of substituting its own decision for that of the original decision. The Overview & Scrutiny Committee may only determine whether or not to refer the matter back to the original decision-making body (or, in specific circumstances, full Council) for reconsideration.

4.4 In accordance with the procedures for the call-in of items, a member of Cabinet Member has been invited to provide information at the meeting to assist the Committee to reach its conclusions.

4.5 A representative of the members who have requested the call-in has also been invited to the meeting and is invited to address the meeting.

5. Community engagement and consultation

5.1 The committee is referred to the original Cabinet report at Appendix 1.

6. Financial implications

6.1 The report sets out the call in process. As such there are no direct financial implications to this report.

6.2 The Committee is referred to the original Cabinet report at Appendix 1

Name of finance officer consulted: Craig Garoghan Date consulted (dd/mm/yy): 29/09/2026

7. Legal implications

7.1 Call-in is a process by which Overview and Scrutiny Committees can recommend that an executive decision made but not yet implemented be reconsidered by the decision-maker. Call-in does not provide for the Overview and Scrutiny Committee to substitute its own decision. That person or body can only be asked to reconsider any particular decision once.

7.2 The Council's Overview & Scrutiny Procedure Rules set out that six members of the Council, including members from at least two political groups, or at least one political group plus independent members(s) are required to call in a Key Decision of the Executive, which has been taken but not implemented, citing at least one of the reasons set out at paragraph 4.2 above. The call-in request in this case has been assessed by the Council's Chief Executive and the Monitoring Officer as complying with the Overview & Scrutiny Procedure Rules.

7.3 The legal implications of the substantive decision are as indicated in the report appended.

Name of lawyer consulted: Katie Kam Date consulted (29/09/2026):

8. Risk implications

8.1 The Committee is referred to the original Cabinet report at Appendix 1.

9. Equalities implications

9.1 There are no direct equality implications to this report. The Committee is referred to the original Cabinet report at Appendix 1.

10. Sustainability implications

10.1 There are no direct sustainability implications to this report. The Committee is referred to the original Cabinet report at Appendix 1.

11. Health and Wellbeing Implications:

11.1 There are no direct health and wellbeing implications to this report. The Committee is referred to the original Cabinet report at Appendix 1.

12. Conclusion

12.1 The Committee are invited to consider the call-in request and the information supplied in response and to determine their response in accordance with the Overview and Scrutiny Procedure Rules.

Supporting Documentation

1. Appendices

1. 17th September 2026 Cabinet report on Item 57 Update report on Western Road Resurfacing Works and Red Route and it's appendices
2. 17th September 2026 Cabinet decision record
3. Extract from the draft minutes of the 17th September 2026 Cabinet meeting
4. Call-in request

Brighton & Hove City Council

Cabinet

Agenda Item 57

Subject: **Update Report on Western Road Resurfacing Works and Red Route**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Corporate Director Operations**

Lead Officer: **Name: Corporate Director- Operations**

Contact Officer: **Name: Charles Field**

Email: charles.field@brighton-hove.gov.uk

Wards affected: Brunswick & Adelaide; Regency;

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 On 20 March 2025 Cabinet approved the design and implementation of a Red Route in Western Road between Holland Road and Montpelier Road. This report seeks permission to proceed with the Experimental Traffic Regulation Order (ETRO) for Western Road and requests that Cabinet notes the need for resurfacing programme for this section of Western Road. This is aligned with the Council Plan objective to 'Make it easier for people to move around the city'

1.2 The Council has subsequently received a Pre-Action Protocol letter and responded, both letters are included in Part 2 of the report. This report provides Cabinet with more detailed information about the primary aim of the scheme, to reduce congestion and improve bus reliability along this key transport corridor. Cabinet is also asked to note the considerations made with reference to the issues highlighted in the Pre-Action Protocol letter and is seeking a fresh new decision from Cabinet in light of this additional information.

2. Recommendations

2.1 Cabinet notes the issues raised in the Pre-Action Protocol (PAP) correspondence, the updated Equality Impact Assessment, and the nature and scope of the proposed monitoring in relation to the primary aim of the scheme. The primary aim or purpose of the scheme is to reduce congestion

in the area to allow for improved bus reliability during the experimental period.

2.2 Cabinet agrees to the implementation of the Experimental Traffic Regulation Order for Western Road between Holland Road and Montpelier Road should proceed, having reviewed this additional information.

2.3 Cabinet notes the resurfacing programme for this section of Western Road.

3. Context and background information

Resurfacing Works

3.1 The council is progressing a major carriageway reconstruction and resurfacing scheme on Western Road between Holland Road and Montpelier Road. The scheme is required due to the condition of the existing carriageway and will involve substantially more work than a conventional resurfacing project, including excavation and reconstruction of the underlying road structure together with associated drainage and highway works.

3.2 The route is one of the city's busiest transport corridors, carrying significant volumes of traffic, public transport, deliveries and pedestrian activity. The works will result in a much more durable surface and reduce the need for future repairs.

3.3 Ground investigations and trial holes are being undertaken to confirm the existing road construction and inform the final engineering design. Subject to the completion of the necessary approvals and permits, construction is currently programmed to commence on 28 September 2026 and is expected to take approximately 45 days.

3.4 Delivering the scheme before the winter period will help prevent further deterioration of the carriageway and reduce the need for reactive maintenance.

3.5 Due to the scale of the reconstruction, significant traffic management arrangements will be required during construction. Detailed planning is underway with key stakeholders, including public transport operators, to minimise disruption and maintain access wherever possible.

Red Routes

3.6 In April 2024 Red Routes were introduced in London Road, Preston Road and Lewes Road primarily to improve bus services and tackle anti-social parking along key routes into and out of the city.

3.7 Monitoring of those routes has noted improvements in bus reliability as a result of reduced congestion and reductions in bus passenger injuries and reductions in road traffic collisions.

3.8 Bus journey times and network reliability can be adversely affected by vehicles stopping on double yellow lines and by loading activity occurring in unsuitable locations.

3.9 On 20 March 2025 Cabinet approved the design and implementation of a Red Route in Western Road between Holland Road and Montpelier Road.

3.10 On 26 May 2026 the Cabinet Member for Transport & City Infrastructure approved the implementation of an Experimental Traffic Regulation Order (ETRO) for the scheme, following completion of the detailed design process and public engagement.

3.11 The proposed Red Route introduces dedicated loading bays, disabled parking provision and camera-enforced double red line restrictions intended to improve the movement of traffic while maintaining access to businesses and services. Camera enforcement is not an automated process and PCNs are not issued automatically. Trained Enforcement Officers actively monitor restrictions, review any potential contraventions and capture evidence. Before a PCN is issued, the recorded evidence is reviewed and verified by a second authorised officer to ensure the contravention has been correctly identified and that sufficient evidence exists to support enforcement action. Western Road is one of the busiest transport corridors in the city and accommodates a high frequency of bus services alongside significant retail, hospitality, servicing and pedestrian activity.

3.12 The ETRO process enables the Council to monitor impacts in real-world conditions and make amendments where appropriate before any decision is made regarding the introduction of a permanent Traffic Regulation Order.

3.13 Following publication of that decision, the Council received Pre-Action Protocol (PAP) correspondence included in Part 2 of this report from representatives of the Western Road Community Group challenging the proposed implementation of the ETRO, A summary of the issues raised can be found in appendix 5

3.14 The Council instructed external Counsel and issued a formal response to the matters raised in that correspondence.

3.15 This report updates Cabinet on the issues raised through the PAP process, provides an update on equalities and implementation arrangements and seeks approval to proceed with the Experimental Traffic Regulation Order.

Statutory Purposes

3.16 The proposed measures will be implemented through an Experimental Traffic Regulation Order (ETRO), which allows the scheme to operate for up to 18 months, with a statutory six-month period following implementation during which formal objections and representations can be submitted and considered before any decision is taken on whether the measures should be made permanent. The ETRO is made under section 9 Road Traffic

Regulations Act for purposes under s1 Road Traffic Regulations Act 1984 only. Specifically, to reduce congestion created by long term parking issues and thereby improve bus journey times through this critical bus corridor through which up to 700 buses per day travel in both directions). Evidence of the congestion is demonstrated by the number of calls received by our enforcement contractor (almost one per week) complaining about large numbers of vehicles parked on double yellow lines in this short stretch of road and requesting that immediate enforcement action be taken. This is despite one of the highest rates of on foot enforcement visits in the city with a total of 705 visits from April 2026 to the beginning of August 2026.

3.17 As explained in 6.2 of this report the cost to the authority of addressing this long running congestion issue and thereby improving bus reliability includes the provision of additional staff and associated costs which largely outweighs any potential incidental income in the longer term. The objective is to improve compliance with the restrictions and improve traffic flow. Experience with previous red routes and other enforcement schemes has followed a similar pattern.

3.18 The budgeted provisional assessment of additional net income that would be raised is £50k from the introduction of this scheme. This should be viewed in the context of the overall council parking surplus from permits, enforcement, on street parking etc. of £22.5m in 2024-25 (see published parking annual report). The PAP Letter has (incorrectly) argued that a dominant purpose of the proposed scheme is to raise revenue. For the reasons set out in this report that is not correct, but the historical matters that letter relies upon to support a suggestion that now the dominant purpose remains revenue raising are dealt with further in appendix 6. The proposals include an approach that when enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking

Section 122 Road Traffic Regulation Act 1984 Balancing Duty

3.19 In exercising its powers under the Road Traffic Regulation Act 1984, the Council must, pursuant to section 122, secure the expeditious, convenient and safe movement of vehicular and other traffic, including pedestrians, whilst having regard to factors including access to premises, local amenities, the effect on the wider road network and environmental considerations. Officers have reviewed the Western Road Experimental Traffic Regulation Order (ETRO) proposal against those statutory requirements. The general need to and benefits of enhancing bus provision through faster, more reliable, and safer services is well established in national guidance running from Bus Back Better in 2021 to current 2026 guidance, as well as through the BSIP adopted by the Council in 2021 and the 2025 refresh. It should be noted that Brighton & Hove is recognised as having one of the highest per person levels of bus use in England, outside London.

Road Safety Evidence

3.20 The Council acknowledges that Western Road has different characteristics to those corridors where Red Routes have previously been introduced in the city and that collision data does not identify incidents specifically attributable to vehicles loading or stopping at the kerbside. However, the objectives of the proposed ETRO are not limited solely to collision reduction. The scheme is intended to improve bus reliability, reduce congestion, improve traffic flow and address obstructive stopping activity on a corridor that accommodates high levels of bus movements, servicing activity, pedestrian activity and general traffic.

Whilst the Council has considered evidence from existing Red Routes elsewhere in the city, officers do not rely on those outcomes as direct predictors of the impacts on Western Road. Rather, they provide evidence that Red Route interventions are capable of delivering transport and road safety benefits in heavily trafficked urban corridors. The purpose of the ETRO is to establish whether those benefits can be achieved in the specific circumstances of Western Road and to gather corridor-specific evidence before any decision is taken regarding a permanent order. Given the significant reduction in collision data in previous red route schemes it does appear reasonable to assume that reducing congestion through providing dedicated bays could have a positive effect in Western Road.

Ability of the Scheme to Achieve its Objectives

3.21 The Council acknowledge that the proposed scheme does not prohibit all stopping activity along Western Road. The scheme includes bus stops, loading bays and disabled bays in order to maintain access to businesses, services and public transport.

The purpose of the scheme is therefore not to eliminate all stopping activity or all potential hazards. Rather, it is intended to manage kerbside activity within designated locations and reduce instances of obstructive or inappropriate stopping that contribute to congestion and delay. Reducing unregulated stopping activity whilst maintaining controlled provision for essential uses is consistent with the Council's duties under section 122 and represents a proportionate approach to balancing competing demands on limited highway space.

Footfall Evidence

3.22 It is recognised that changes in footfall are influenced by a wide range of factors including economic conditions, seasonal variation, development activity, weather and wider changes in travel behaviour. It is therefore not possible to attribute any change in footfall solely to the introduction of a Red Route.

For this reason, there is no reliance on claims that a Red Route will necessarily increase footfall on Western Road. Rather, evidence from other corridors indicates that slightly increased footfall has occurred following implementation of Red Routes, although the precise contribution made by

the schemes cannot be isolated. Footfall impacts remain uncertain and will require monitoring as part of the experimental period.

Air Quality Evidence

3.23 It is recognised that air quality outcomes are similarly affected by a range of factors, including traffic composition, vehicle technology, wider transport trends and background environmental conditions, as well as a potential reduction in engine idling.

Red Routes alone are not necessarily responsible for changes in air quality observed elsewhere in the city. However, reducing unnecessary congestion and improving traffic flow are generally recognised as factors capable of contributing to improved air quality. The evidence available from existing corridors provides some indication of potential benefits, but the specific effects on Western Road cannot be determined in advance and should therefore be assessed through the monitoring arrangements associated with the ETRO.

Economic Impacts

3.24 The importance of Western Road as a significant retail, leisure and commercial destination is acknowledged and concerns regarding potential impacts on independent businesses, servicing activity and customer access are noted.

The scheme has been developed with regard to these considerations through engagement with businesses, site assessments and review of loading requirements. It is recognised that Western Road contains a concentration of businesses that rely on front-of-premises servicing and that the corridor differs from some other locations due to limited rear servicing opportunities. The provision of new loading bays supports continued accesses to businesses for servicing.

These factors are of significance within the section 122 balancing exercise. However, they are balanced against the objectives of improving bus reliability, reducing congestion and improving traffic flow along one of the city's busiest transport corridors in line with the Council Plan objective of ‘Making it easier for people to move across the city’. The ETRO process has been selected specifically because it enables economic impacts to be monitored in operation and allows adjustments to be made if evidence demonstrates that modifications are required. As with previous red routes footfall will be monitored during this experimental period.

Traffic Displacement and Conservation Areas

3.25 Concerns regarding the potential displacement of parking and servicing activity into adjacent residential streets, including streets within or adjoining the Brunswick Town Conservation Area and around Brunswick Square are recognised.

Potential displacement effects have been considered during development of the proposal. Some degree of behavioural change may occur following implementation, but the scale and significance of any displacement cannot be reliably determined in advance. Accordingly, monitoring of adjacent streets will form part of the assessment of the ETRO. In addition to this and to mitigate, increased Civil Enforcement Officer presence in those streets will take place during the experimental scheme and on an ongoing basis to dissuade any displacement effects.

Loading Bay Provision

3.26 The adequacy of loading provision has been a key consideration in the design of the scheme. The location and size of proposed loading bays has been informed by site visits with Road Safety officers, stakeholder engagement and consultation feedback. The maximum distance between the proposed loading bays and a business is approximately 70 metres. Although it should be noted that the ability to deliver is currently sometimes hampered by inappropriate parking.

Concerns regarding loading provision in the western section of the corridor are noted and that loading requirements vary between businesses throughout the day. For this reason, information about the frequency and size of vehicle deliveries was gathered as part of the Your Voice consultation. Loading bay occupancy and utilisation will form a specific part of the monitoring programme during the experimental period.

The ETRO process provides flexibility to amend the location, size or operation of loading bays where monitoring evidence demonstrates that changes are required. It is considered that the proposed loading arrangements provide an appropriate starting position for an experimental scheme whilst retaining sufficient flexibility to respond to operational experience.

Overall Section 122 Assessment

3.27 The uncertainties and concerns identified in relation to safety evidence, economic effects, displacement, loading provision, air quality and footfall are noted. Having considered the matters above it is considered that the factors identified in section 122 of the Road Traffic Regulation Act 1984 have been appropriately balanced against the potential benefits and the requirements of Section 122 satisfied. Based on previous red route schemes, the council reasonably expects reduced congestion, improved bus reliability and associated benefits.

The nature of these uncertainties identified in this report support the use of an Experimental Traffic Regulation Order rather than weigh against it, as the ETRO process allows the Council to gather Western Road-specific evidence, monitor impacts, engage with stakeholders and make modifications where necessary before determining whether any arrangements should become permanent.

4. Analysis and consideration of alternative options

4.1 The option of not proceeding with the Experimental Traffic Regulation order in Western Road was considered. However, based on the areas where red routes have been introduced there are significant potential benefits to relieving congestion in the Western Road area, such as improved road safety and bus journey times.

4.2 The option of implementing a permanent Traffic Regulation Order from the outset was considered. The learning from the introduction of Red Routes in Lewes Road and London Road using Experimental Traffic Regulation Orders has shown that engagement with businesses and disabled groups is necessary after the Red Route has been implemented and this can require rapid adjustments to the initial design of the scheme, which are much more easily facilitated through the Experimental Traffic Regulation Order process.

5. Community engagement and consultation

5.1 Consultation on the design of the scheme was held at LAT meetings and the Cabinet Member for Transport & City Infrastructure. Meetings were also held on the scheme design with the Disabled Car User Advisory Group.

5.2 Over 4,700 leaflets were sent to residents in the area inviting them to comment on the proposed red route between 24 November 2025 – 4 January 2026. 1,032 responses were received and a summary of their feedback can be found in appendix 1

5.3 Fifty per cent of respondents said they believed the red route would improve safety, 53 per cent said it would speed up bus journeys and 56 per cent felt it would help keep traffic moving. People with disabilities and Blue Badge holders were concerned about access. More disabled bays will be introduced on both Western Road and its side streets. We will be monitoring the use of these bays continuing to engage with disabled groups. Businesses asked for more loading bays and some raised concerns that business could be negatively affected by the red route with a decline in footfall.

6. Financial implications

6.1 As with any introduction of new enforcement schemes across the city there is likely to be a short-term spike in the Penalty Charge Notice income, however this would be a short-term impact only and cannot be quantified. Any additional income received will be reported to Cabinet through the revenue TBM reports.

6.2 As noted above, the primary aim of the Western Road scheme is to reduce congestion, not revenue generation. Although a short-term increase in income is expected this is largely offset by the cost of cameras and enforcement staff. Experience of the introduction of previous red routes

indicates that compliance with the new restrictions improves quickly resulting in a fall in Penalty Charge Notices issued after the initial peak. Therefore, overall impact of this scheme on parking budgets has been budgeted at £50k annually as part of the savings exercise for 26/27

6.3 The tendered value of Western Road resurfacing works is £988,431 and will be covered by the Highways maintenance Block funding awarded by the Department for Transport (DfT). This has no budgetary impact on the council as a result

Name of finance officer consulted: David Wilder Date consulted 26/8/2026:

7. Legal implications

7.1 The Council has powers under sections 9 and 10 of the Road Traffic Regulation Act 1984 ("RTRA 1984") to make an Experimental Traffic Regulation Order ("ETRO") for the purposes of carrying out an experimental scheme of traffic control, to test proposed traffic management measures. The proposed ETRO would introduce Red Route restrictions along Western Road on an experimental basis, which will enable the Council to assess the effectiveness of the measures in reducing congestion and thereby improve bus journey times.

7.2 In exercising its powers, the Council must have regard to its duties under section 122 of the RTRA and the report sets out in detail these considerations and comes to an overall assessment and conclusion that the ETRO is justified. The Council must also have regard to its network management duty under section 16 of the Traffic Management Act 2004 to secure the expeditious movement of traffic on its road network and facilitate the movement of traffic on other authorities' networks; the proposed ETRO seeks to secure the expeditious movement of traffic along this section of its road network. The Council must have regard to equality considerations under section 149 of the Equality Act 2010 (the Public Sector Equality Duty); section 9 of the report sets out how the Council has paid due regard to these considerations.

7.3 The Council must ensure that the statutory consultation and notification requirements are fully complied with and that all representations received are properly considered as part of any subsequent decision-making process.

Name of lawyer consulted: Katie Kam Date consulted (19 08 2026):

8. Risk implications

8.1 There is a risk that businesses along the route area could be less able to receive their deliveries. Although the area is already suffering from significant congestion which can hamper deliveries. Ten loading bays have been included in the scheme design, with a total of 140 meters of loading space to meet these needs based on the required size of delivery vehicle.

The Experimental Traffic Regulation Order process together with engagement with businesses allows for rapid changes to the size and location of loading bays.

8.2 There is a risk that parking activity can be displaced to side streets. To mitigate this Civil Enforcement Officers will be deployed to patrol side streets along the red route area.

9. Equalities implications

9.1 Officers held three meetings with the Disabled Car User Advisory Group specifically on the red route proposals. The group highlighted that the introduction of a red route could negatively impact disabled people's access to Western Road, including attending healthcare and other appointments, undertaking everyday shopping/leisure, receiving deliveries.

9.2 These meetings have helped informed the location of disabled bays along the red route and their location close to health facilities as well as an even distribution along the area (see appendix 3). On Western Road a 3-hour maximum stay in disabled bays to prevent long term parking and improve access to these bays is proposed. As with Lewes and London Road red routes drivers and taxis will be able to drop off disabled passengers along the red route. In Upper Market Street a new disabled bay is being introduced close to the WellBN Brunswick clinic. In addition to this a further 4 disabled bays are being proposed along Western Road.

9.3 An EIA has been prepared which considers the feedback from the Disabled Car User Advisory Group meetings and the feedback from the Your Voice consultation. The aim of the red route is to relieve congestion and improve bus journey times including for disabled bus passengers.

9.4 The main positives identified in the EIA are:

- Ease of traffic flow and designated bays allows for safer roads with clearer sight lines for traffic
- 7,000 disabled people in the city have free bus passes and rely on buses to travel safely and easily around the city, and bus reliability is expected to improve.
- Red routes, loading and disabled bays provide for enough time for carers to pick up and drop off disabled clients • Improved traffic flow benefits emergency vehicle access
- Clearer road layout improves safety for people with visual impairment

9.5 The main negatives identified in the EIA are:

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.

- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Changes to restrictions could limit access by Blue Badge holders with severe mobility issues to some locations within the scheme area.
- May impact those requiring door-to-door transport services
- Could affect those who need frequent rest stops due to mobility issues

9.6 Mitigations to address these negative impacts are being put in place as set out at paragraph 9.2. Overall, it is recognised that Blue Badge holders can currently experience difficulties accessing shops in the area due to the number of bus stops, pedestrian crossings and the volume of vehicles parked on yellow lines under the current restrictions. The proposed change in the restrictions will provide new disabled bays solely for the use of Blue Badge holders to access the area although it is acknowledged that they will not always be sufficiently close to shops or may be occupied. The scheme should however benefit disabled bus passengers through more reliable bus services in this busy transport corridor and throughout the city.

In conclusion, it is acknowledged that the proposed scheme may have some negative impacts for certain groups, but has sought to minimise these through engagement, design changes, mitigation measures and ongoing monitoring. Having balanced these impacts against the anticipated benefits of improved bus reliability, traffic flow, road safety and accessibility for public transport users amongst others, the Council considers that the overall impact is positive and that any remaining adverse impacts are justified and proportionate in the context of the wider public benefits the scheme is intended to deliver.

10. Sustainability implications

10.1 Experience from the Lewes and London Road red routes shows that they can reduce congestion along the route and make the area more attractive for cyclists and other forms of active travel. Improvements to bus reliability have also been observed, which encourages more sustainable forms of travel with the aim of improving air quality in the area.

11. Health and Wellbeing Implications:

11.1 The purpose of the red route is to relieve congestion and make the area safer for drivers, bus passengers and cyclists, which can also encourage active travel. Air quality improvements have been observed in areas where other red routes have been introduced.

12. Conclusion

12.1 Following the March 2025 Cabinet decision to approve the design and implementation of a red route in Western Road officers have now completed the design of the scheme based on feedback from pre-engagement and the Your Voice survey. As part of the Experimental Traffic Regulation Order

process amendments to the design shown in appendix 4 can be made promptly as part of further public engagement.

12.2 Experience following the introduction of red routes in other areas of the city has shown there can be benefits in terms of road safety and bus reliability without negatively affecting footfall in the area.

Supporting Documentation

1. Appendices

1. Consultation and Engagement Summary
2. Equality Impact Assessment
3. Disabled bay location plan
4. Western Road ETRO Plan
5. Summary of Pre-Action Protocol letter and response
6. Chronology

2. Background documents

1. Cabinet Report: Red Routes, 20 March 2025.
2. Cabinet Member Decision Report: Permission to Proceed with Experimental Traffic Regulation Order for Western Road Red Route, 26 May 2026.
3. Bus Service Improvement Plan programme documentation.
4. Council Plan 2023-2027
5. City Transport Plan 2035
6. Local Cycling and Walking Infrastructure Plan

Western Road Red Route - Your Voice consultation report 2026

Background

A Red Route is proposed for implementation on Western Road, from Holland Road to Montpelier Road. This is proposed under an Experimental Traffic Regulation Order (ETRO) following the same process as the Red Route's on London/Preston Road and Lewes Road. This consultation is to gather feedback on the proposals and initial design.

Methodology

Brighton & Hove City Council sent an information leaflet to addresses directly on Western Road and the surrounding area of the proposed changes. This leaflet included a detailed map of the proposed changes, and frequently asked questions. People were asked to go online to complete the consultation survey. This was also promoted on the Council website, Facebook, X & LinkedIn. People could also request a paper copy of the questionnaire with a pre-paid envelope to return. The consultation ran from 24 November 2025 – 4 January 2026.

Results

A total of 1,032 responses were received.

Questions asked and answers are as follows:

- How are you responding to the consultation?

Respondent type	Amount
A business owner or manager	32
A local resident	937
A stakeholder or on behalf of an organisation	11
A visitor	52

- **What do you mainly use the area for?**
  This was a multiple choice question

Activity	Amount
To visit friends and family	281
To visit a place of worship	29
To sit in the gardens	128
To get from A to B	675
I work here	141
For leisure	581
To shop	704
Other	110

‘Other’ was a free form box, common answers are below:

- I live here / in the area
- To visit essential services (GP, chemist, dentist, opticians, hearing clinic, laundrette)
- Commuting and travelling through
- Dropping off friend/family
- School run

- **How many deliveries do you receive per day?**
  This was answered by 29 business owners or managers, 2 local residents and 1 as a stakeholder or on behalf of an Organisation.

Delivery frequency	Amount
A few times per week	12
Once per day	2
More than once per day	18

- **What size is the delivery vehicle?**
  Multiple choice question

Vehicle type	Amount
Transit Van	21
Luton Van	12
7.5 Lorry	10
HGV	8
Articulated lorry	6
Car	8
Don’t know/not sure	2

- **Do you think the proposal will improve safety for:**

Road user type	Yes amount	Yes %	No amount	No %	Not sure amount	Not sure %
Pedestrians	543	52.6%	412	39.9%	34	3.3%
Cyclists	560	54.3%	367	35.6%	45	4.4%
Disabled people	487	47.2%	400	38.8%	72	7.0%
Drivers	462	44.8%	413	40.0%	73	7.1%
Bus Users	524	50.8%	383	37.1%	144	14.0%

- **Do you think the proposals will?**

Improvement statement	Yes amount	Yes %	No amount	No %	Not sure amount	Not sure %
Improve bus journey times	542	52.5%	375	36.3%	65	18.7%
Keep the traffic moving	581	56.3%	358	34.7%	135	4.4%
Improve loading capacity for deliveries	324	31.4%	476	46.1%	156	15.1%

Common themes

Respondents were then asked if they had any further comments on the proposals, there was a free form text box to give further feedback. These have been grouped by common themes and are detailed below. 792 respondents left further comments, 76.7%.

Comment Themes	Amount
Will adversely affect businesses	201
Road or pavement currently feels dangerous with illegal parking & high congestion	102
Proposals will increase displacement to side roads / have an effect on resident parking bays	58
Where do businesses /loading park/ not enough loading bays	52
Enforce existing rules instead	50
Hope this improves cycling safety / general road safety	50
Adverse effect on blue badge holders / person with a disability / vulnerable people	41
Looks great / should have happened years ago	38
Where do customers park? Needs short term customer parking	38
Needs more parking / more parking should be in side roads	36
Stop pavement parking	23
Ensure its correctly enforced	19
Hopes this will improve bus journey times / Bus currently takes too long	19
Extend the Red Route	15
Poor road condition / Needs resurfacing	14
Irrelevant comments	13
Hope this improves air quality / poor air quality currently	12
Concern on speeding / 20mph needs to be enforced	12
Needs light controlled crossings /bottom Brunswick place	11
Time of day flexibility for bay use /24 hour route not needed	11
Special needs for this business	10
Use DYL's instead of single/ DYL's instead of red route	8
Would like a cycle lane	7
Traffic would move faster and feel more dangerous / cause more congestion / more air pollution	7

Observed criminal and illegal activity	5
Concern on amount of loading bays (too many)	4
Consultation trust / disappointed in questions	4
CCTV concern / privacy	4
Project team to be aware of comment	4
Where do visitor's park	3
Stronger fines needed	3
Infrastructure comment (bollards, pavements)	3
Too much residents parking	2
Include a bus lane / bring back bus stop	2
Alternative parking solutions	2
Only useful Montpelier to Norfolk Square	1

Equalities and demographic questions & information

Do you want to answer the following equalities monitoring questions?	Amount
Yes	567
No	465

What is your age	Amount
18-24	14
25-34	76
35-44	94
45-54	137
55-64	137
65-74	81
75-85	21
85+	1
Prefer not to say	3

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Amount
Yes, a lot	45
Yes, a little	78
No	425
Prefer not to say	18

Are you a carer?	Amount
Yes	46
No	506
Prefer not to say	13

Is the gender you identify with the same as your sex registered at birth?	Amount
Yes	535
No	7
Prefer not to say	19

How would you describe your ethnic origin?	Amount
Asian / Asian British: Chinese	1
Asian / Asian British: Indian	3
Asian / Asian British: Other	5
Black / Black British: African	3
Black / Black British: Caribbean	3
Mixed: Any other mixed / multiple ethnic background	5
Mixed: Asian and White	7
Mixed: Black African and White	1
Mixed: Black Caribbean and White	3
Other ethnic group, please describe	1
Other Ethnic Group: Arab	4
White: English, Welsh, Scottish, Northern Irish, British	434
White: Gypsy or Irish Traveller	1
White: Gypsy or Irish Traveller	9
White: Other	57
Prefer not to say	22

What is your religion or belief?	Amount
Agnostic	16
Atheist	56
Buddhist	8
Christian	96
Hindu	1
Jain	1
Jewish	4
Muslim	4
Pagan	2
Other philosophical belief	10
Other religion or belief, please describe	16
Prefer not to say	24

Brighton & Hove City Council

General Equality Impact Assessment (EIA) Form

Support:

An EIA toolkit, workshop content, and guidance for completing an Equality Impact Assessment (EIA) form are available on the EIA page of the EDI Internal Hub. Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	Red Route – Western Road
Directorate:	City Services
Service:	Parking Services
Team:	Parking Projects
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – EEC51 Red Routes Experimental

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Flora McLeod, Senior Parking Projects Officer
Accountable Manager:	Peter Turner, Senior Parking Projects Manager
Additional stakeholders collaborating or contributing to this assessment:	James Ingle, Parking Projects Support Officer

3. About the activity

Briefly describe the purpose of the activity being assessed:

After the public consultation and successful implementation of the Experimental Traffic Regulation Order (ETRO) Red Routes on Lewes Road and London Road, the Parking Projects team received a number of emails supporting the scheme and asking for further red routes within the city. This equality impact assessment will grow as the project progresses and following our public consultation.

The focus of this EIA is to ensure that all impacts relating to the listed below groups are identified and considered within the scope of the project, funding availability and realistic ability to mitigate. This will include accessibility to loading and parking provisions, how to reduce concerns with exemption information and unfair penalisation.

What are the desired outcomes of the activity?

Objective 1: To reduce congestion and make travel easier and safer for all road users. A Red Route on Western Road is anticipated to reduce congestion through CCTV monitoring and issuing Penalty Charge Notices (PCNs) to nuisance loading and stopped vehicles.

Objective 2: To help the city work towards its carbon net zero objectives by reducing emissions and improving air quality as outlined in the corporate plan (Source: Brighton & Hove City Council plan 2023 to 2027). Prohibition of stopping directly reduces obstructions caused dangerous loading and nuisance parking through strict enforcement helping to reduce emissions from congested traffic and improving air quality. This is especially important as Western Road is a Low Emissions Zone.

Which key groups of people do you think are likely to be affected by the activity?

Age, Disability, Expatriates, Migrants, Asylum Seekers, Refugees, and Carers

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Pre-engagement consultation

An online pre-engagement consultation was carried out to collect feedback on the initial design for the proposed Red Route. Leaflets containing the design and supporting information were distributed to households and businesses within the affected area, promoting the consultation and signposting

residents to the online survey. The design materials were also made available on the *Your Voice* platform. This platform has been tested for accessibility and ongoing improvements are made where necessary.

To support accessibility and inclusion, respondents were offered the option to request paper surveys by telephone, which could be returned by post via a pre-paid envelope. The option for the leaflet to be printed in other languages, formats such as easy read, large print, Braille or BSL was explained on the leaflets. In person requests were not explicitly offered at this time however we expect to meet residents and businesses through request throughout the project. Attendance to the Disabled Car User Advisory Group meetings (as outlined below) are held online via zoom at the request of the meeting organiser as this format best suits the accessibility needs of the group.

Analysis of the pre-engagement consultation feedback has been completed and due to be presented to members at Informal Cabinet. Once reviewed, the findings will be incorporated into this Equality Impact Assessment to inform the understanding of potential impacts on groups with protected characteristics.

Disabled Car User Advisory Group (DCUAG)

- **4 June 2025** – Red Routes Special
- **26 September 2025** – Red Route Workshop (Part 1)
- **7 October 2025** – Red Route Workshop (Part 2)
- Regular attendance at the bimonthly DCUAG meetings to provide project updates and listen to concerns.

During these sessions, officers presented the proposals and gathered feedback. The group highlighted that the introduction of a red route could impact disabled people's access to Western Road, including attending healthcare and other appointments, undertaking everyday shopping/leisure, receiving deliveries, and potential increases in taxi costs.

Across the two workshop meetings, officers shared visual maps of the existing Western Road layout and invited comments on suitable locations for disabled parking bays.

Constructive input from the group informed the decision to apply a maximum stay of three hours for all disabled bays along the proposed route. This measure aims to prevent long stay blue badge parking and improve availability for those who need access most.

Western Road Local Action Team (LAT) group

4 June 2025 – Western Road LAT Meeting
Officers attended this meeting to support Councillors in responding to residents and businesses concerns regarding the proposed Red Route. Discussions focused on how the proposals might affect businesses, including impacts on trading, access for customers, and receiving deliveries.

10 September 2025 – Western Road LAT Meeting: Red Route Workshop
Officers facilitated a workshop with residents and businesses, providing printed maps of the existing street layout and inviting feedback on preferred locations for loading and disabled bays. Officers also explained where restrictions must be applied, near crossings, bus stops, and junctions.

Officers will continue to attend DCUAG and LAT meetings throughout the project. Should the Red Route be implemented, this engagement will continue during the first six months of the Experimental Traffic Regulation Order.

Equalities data from the consultation:

Out of 1,032 participants 567 agreed to answer the equalities monitoring questions. The questions and answers follow below.

What is your age?	Responses
18 - 24	14
25 - 34	76
35 – 44	94
45 – 54	137
55-64	137
65 - 74	81
75 – 85	21
85+	1
Prefer not to say	3

A total of 564 responses were received across a range of age groups:

- 14 respondents were aged 18 to 24
- 76 respondents were aged 25 to 34
- 94 respondents were aged 35 to 44
- 137 respondents were aged 45 to 54
- 137 respondents were aged 55 to 64
- 81 respondents were aged 65 to 74
- 21 respondents were aged 75 to 85
- 1 respondent was aged 85 and over
- 3 respondents preferred not to say

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Responses
Yes, a lot	45
Yes, a little	78
No	425
Prefer not to say	1

Respondents were asked whether their day-to-day activities are limited by a health problem or disability lasting, or expected to last, at least 12 months:

- 45 respondents said their activities are limited a lot
- 78 respondents said their activities are limited a little
- 425 respondents said their activities are not limited
- 1 respondent preferred not to say

Are you a carer?	Responses
Yes	46
No	506
Prefer not to say	13

Respondents were asked whether they are a carer:

- 46 respondents said they are a carer
- 506 respondents said they are not a carer
- 13 respondents preferred not to say

Is the gender you identify with the same as your sex registered at birth?	Responses
Yes	535
No	7
Prefer not to say	19

Respondents were asked whether the gender they identify with is the same as their sex registered at birth:

- 535 respondents said Yes
- 7 respondents said No
- 19 respondents preferred not to say

How would you describe your ethnic origin?	Responses
Asian / Asian British: Chinese	1
Asian / Asian British: Indian	3
Asian / Asian British: Other	5
Black / Black British: African	3
Black / Black British: Caribbean	3
Mixed: Any other mixed / multiple ethnic background	5
Mixed: Asian and White	7
Mixed: Black African and White	1
Mixed: Black Caribbean and White	3
Other ethnic group, please describe	1
Other Ethnic Group: Arab	4
White: English, Welsh, Scottish, Northern Irish, British	434
White: Gypsy or Irish Traveller	1
White: Other	57
Prefer not to say	22

Respondents were asked to describe their ethnic origin:

- 1 respondent identified as Asian or Asian British: Chinese
- 3 respondents identified as Asian or Asian British: Indian
- 5 respondents identified as Asian or Asian British: Other
- 3 respondents identified as Black or Black British: African
- 3 respondents identified as Black or Black British: Caribbean
- 5 respondents identified as Mixed: any other mixed or multiple ethnic background
- 7 respondents identified as Mixed: Asian and White

- 1 respondent identified as Mixed: Black African and White
- 3 respondents identified as Mixed: Black Caribbean and White
- 1 respondent selected other ethnic group (not specified)
- 4 respondents identified as Arab (Other ethnic group)
- 434 respondents identified as White: English, Welsh, Scottish, Northern Irish or British
- 1 respondent identified as White: Gypsy or Irish Traveller
- 57 respondents identified as White: Other
- 22 respondents preferred not to say

What is your religion or belief?	Responses
Agnostic	16
Atheist	56
Buddhist	8
Christian	96
Hindu	1
Jain	1
Jewish	4
Muslim	4
Pagan	2
Other philosophical belief	10
Other religion or belief, please describe	16
Prefer not to say	24

Respondents were asked about their religion or belief:

- 16 respondents identified as agnostic
- 56 respondents identified as atheist
- 8 respondents identified as Buddhist
- 96 respondents identified as Christian
- 1 respondent identified as Hindu
- 1 respondent identified as Jain
- 4 respondents identified as Jewish
- 4 respondents identified as Muslim
- 2 respondents identified as Pagan
- 10 respondents identified as having another philosophical belief
- 16 respondents selected another religion or belief (not specified)
- 24 respondents preferred not to say

The equality monitoring data presented above is self-reported and based on consultation responses only therefore may not be fully representative of all affected groups. Ongoing engagement of the proposed scheme will support the identification and management of any equality-related impacts as the project progresses. This will include continued engagement the DCUAG, alongside any other communication with residents, visitors and businesses through emails, meetings, on-site visits where appropriate, and LAT meetings.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered "NO" to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Gathering equalities data for road users is limited, as road use is transient and anonymous, and personal data on protected characteristics cannot be captured through observational or traffic data. This EIA therefore uses a combination of local demographic data and engagement with representative groups to identify and assess potential impacts on protected groups.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

• Regular review of feedback from affected groups • Monitor traffic flow and air quality improvements • Track public transport reliability • Review accident statistics • Assess impact on local businesses • Regular consultation with stakeholder groups

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
  - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
  - **Consider a wide range (including but not limited to):**
    - Population and population groups
      - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
    - Census and local intelligence data

- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: people who may be housebound, those under 16, young adults, with other intersections.	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

As identified in the 2021 census, the majority of Brighton and Hove City's population is aged 16-66 years of age, with:

- 15% under 16 years old
- 72% being 16 - 66 years old.
- 10% being 67- 84 years old.
- 2% being 85 or older.

Positives

- By being able to enforce no parking along Red Routes carriageway obstructions will be reduced providing a safer environment for road users of all ages.
- Improvement of journey times and reliability will positively impact all age groups
- Local air quality can be improved through reduced idling emissions supporting improved/sustained health of all ages - Improved air quality particularly benefits older people and young children who are more vulnerable to respiratory issues.
- More reliable bus services benefit older people who are more dependent on public transport

Negatives

- Lack of understanding of how Red Routes work with no stopping and the use of loading bay maybe harder to understand for older people who are more used to previous road conditions
- May impact elderly people being dropped off/picked up by family/carers

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 19.5% of Brighton and Hove's population are disabled under the Equality Act:
- 8% experience day to day activities being limited a lot.
- 11.5% experience day to day activities being limited a little.
- There are 13,255 Blue Badge holders in Brighton and Hove.
- There are 8,894 disabled bus pass holders.

Disability age standardised - Census Maps, ONS

Positives

- Ease of traffic flow allows for safer roads
- Local air quality can be improved through reduced idling emissions
- Some disabled people rely on carers to travel safely and easily around the city.
- Loading bays allow stopping providing enough time for carers to pick up and drop off disabled clients
- Improved traffic flow benefits emergency vehicle access
- Better air quality benefits those with respiratory conditions
- Clearer road layout improves safety for people with visual impairments

Negative

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.
- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Relining works could cause disruption and works vans could be blocking spaces which could be used by Blue Badge holders.
- May impact those requiring door-to-door transport services, especially those who are housebound and rely on cars for everyday activities.
- Could affect those who need frequent rest stops due to mobility issues

What inclusive adjustments are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

- Any consultation will be sent with an option to have the text in Braille, by phone, option for postal engagement and Your Voice, with a reasonable amount of time given for all responses. There will also be a number that anyone wishing to respond to the consultation can request a paper copy of the questions.
- Identify disabled parking bay provision on nearby side roads. - Completed along with a study showing a 50m radius between each proposed disabled bay in the Red Route design and on adjoining side streets.

• Meet with disability groups (Disabled Car Users' Group [DCUG], BADGE & Possability People) to discuss the Red Route and any issues they may have and specific needs and explore mitigations to reduce any disproportionate negative impacts • Include our consultation findings and mitigation plans in a review and update of this EIA • Blue Badge holders can be picked up or dropped off, so long as the vehicle is not parked. We will use discretion in cases where, for example, a wheelchair is being taken out of a vehicle. • Implement clear signage • When enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This protected characteristic was consciously considered as part of this assessment. Based on the nature of the proposal, available local demographic data, engagement undertaken to date, and the fact that the restrictions apply universally to all road users, no evidence has been identified at this stage to indicate a disproportionate negative impact compared with the general population. This position will be kept under review as the project progresses.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This group was considered as part of the assessment, and no evidence has emerged from available data or engagement to suggest a disproportionate negative impact at this stage. Impacts will continue to be reviewed as monitoring and engagement progress.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 88.1% of households have all adults with English as their main language.
- 5.4% of households have at least one adult with English as their main language.
- 1% of households have at least one person aged 3-15 with English as their main language but no adults.
- 5.4% of households have no people that have English as their main language. Census ONS
- 20% of residents were born outside of the UK. Council Plan 2023 to 2027.pdf

Positives

- Ease of traffic flow allows for safer roads
- Local air quality can be improved through reduced idling emissions

Negatives

- New restrictions being introduced can be anxiety inducing due to uncertainty around the changes and rules
- Non translated materials can cause anxiety, frustration, and information to not be conveyed fully

- Individuals who do not use English as their main language could be excluded if consultation materials are not appropriately translated
- Lack of consultation time could lead to exclusion for minority groups

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- As of 15/10/2024 there are 3205 active Professional Carers Permits issued by Brighton & Hove City Council. These are permits issued by Brighton and Hove City Council to allow Professional Carers to park in any controlled parking zone within Brighton and Hove.
- Drivers with a valid blue badge can pick up and drop off on a Red Route.
- 1 in 12 residents provide unpaid care.

Positive

- Ease of traffic flow improves road safety and allows for safer roads
- Local air quality can be improved through reduced idling emissions
- Loading bays allow stopping providing enough time for carers to pick up and drop off people who are being cared for

Negative

- Potential for lack of loading and unloading spaces for carers to be able to drop off the person being cared for
- Potential for lack of disabled bays making it difficult for those with disabilities and for carers
- Having enough time in loading bays for carers to pick up or drop off cared for people in loading bays
- Loading bays not being close enough to the destination for those needing to be cared for

Mitigating action for negative impact

Discretion is used when monitoring activity on a Red Route and will be used to make a case-by-case decision on whether a ticket is issued.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 4.3% of the population of Brighton and Hove are deprived in 3 dimensions according to the Census 2021 data.
- 36.2% of the households in Brighton and Hove are economically inactive according to the Census 2021 data.

Positive

- Ease of traffic flow and designated bays allows for safer roads with clearer line of sight of traffic
- 7,000 disabled people in the city have free bus passes and rely on buses to travel safely and easily around the city, and bus reliability is expected to improve.
- Red routes, loading and disabled bays provide for enough time for carers to pick up and drop off disabled clients
- Improved traffic flow benefits emergency vehicle access
- Clearer road layout improves safety for people with visual impairment

Negative

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.
- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Changes to restrictions could limit access by Blue Badge holders with sever mobility issues to some locations within the scheme area.
- May impact those requiring door-to-door transport services
- Could affect those who need frequent rest stops due to mobility issues

Mitigating Action for negative impact

- When enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.

- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
  - People being housebound due to disabilities or disabling circumstances
  - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
  - People experiencing homelessness
  - People on a low income and people living in the most deprived areas
  - People facing literacy, numeracy and/or digital barriers
  - Lone parents
  - People with experience of or living with addiction and/ or a substance use disorder (SUD)
  - Sex workers
  - Ex-offenders and people with unrelated convictions
  - People who have experienced female genital mutilation (FGM)
  - People who have experienced human trafficking or modern slavery

- Residents, business owners, traders and visitors will be impacted by the changes a Red Route brings. Though these impacts will be felt more or less by certain groups outlined in this assessment.
- Safer walking and cycling routes, along with improved public transport networks will provide alternatives to increasingly unaffordable car ownership.
- Overall vehicle access to Western Road could be impacted due to changes in ability to stop on the roadside.
- Work with representative groups in the city to understand transport and travel issues/concerns for protected groups and key local groups.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

- Conduct accessible and inclusive consultation and engagement on the Red Route proposal by 21/10/2025 and update this EIA with consultation findings to inform decision making at 15/12/2025 meeting.
- Contact disability groups BADGE, Possibility People and Disabled Car Users Group when consultation is carried out to consult over the Red Route in Western Road and better understand the impacts of the proposed project on disabled people. - Completed 24.11.2025
- Ensure those who English is not their first language have access to consultation for the Red Routes. This will be measured in replies received from those who do not use English as their first language or do not speak English or from different ethnic backgrounds. We will measure this at the end of consultation.
- Include our consultation findings and associated mitigation plans in a review and update of this EIA. Updated in section 4 as of 15/04/2026.
- The proposed Red Route would be implemented under an Experimental Traffic Regulation Order (ETRO) which means that changes can be made quickly in response to feedback, when

appropriate, much quicker than a formal Traffic Regulation order. The first 6 months of the ETRO will be another consultation period where we will be recording feedback.

- During the first few weeks of enforcement of the proposed Red Route there will be extra provision of Civil Enforcement Officers patrolling side roads off Western Road to discourage displacement or new anti-social parking.
- Monitor and review the location, availability, and time limits of proposed disabled and loading bays along and adjacent to Western Road. The project team have gathered feedback from the DCUG on the ideal time limit for disabled bays on Western Road which has informed the design. This will continue to be monitored throughout the project and into the ETRO period.Ahead of implementation project team to arrange clear and informative information via comms explaining the upcoming changes, loading arrangements and new disabled provision. To also include the enforcement approach in this. This information to be accessible and able to be provided in alternative formats when required. This information will also be relayed at the DCUAG meetings.
- Continue structured engagement with disability and carer representative groups to identify access issues, test mitigations, and inform adjustments during the experimental phase. At least one project officer to join the DCUG meetings by monthly and respond to queries/concerns as well as complete any actions for the team. This will be continued during the ETRO period.
- Review this Equality Impact Assessment using feedback, monitoring data, and engagement findings to assess whether mitigation measures remain effective. EIA to be regularly updated with oversight and input from the Equalities team. This is to be continued through the ETRO process.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Western Road Project team plan

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	**X**
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

Throughout this EIA it has become clear that there is a need for Red Route specific consultation. Consultation will be required to allow the local population to address any concerns with the Red Routes and so that people will be aware of new restrictions in the area. Publicity will also be required to make the wider public aware of the new Red Routes, the restrictions loading/disabled bays. Overall, the project will have a positive impact on the area, improving road safety and air quality by reducing idling emissions. This is in line with the council's commitment to be a Carbon Neutral City by 2030.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Flora McLeod, Senior Parking Projects Officer	29/04/2026
Accountable Manager:	Peter Turner, Senior Parking Projects Manager	29/04/2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service,

Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and HEad of Service level approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Zofia Danin	11-Jun-2026
EDI Manager:	Lindsey Pearce	29-Jul-2026

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

= A 50 metre radius from each disabled parking space

Proposed Loading Bay

Red Route

Existing Disabled Bay

Proposed Disabled Bay

N

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Project : Western Road Red Route	PARKING PROJECTS	Scale : NTS	Brighton & Hove City Council
	TRANSPORT	Date : APR26	
Title : Red Route Disabled Bay Radius		Drawn : JE	
		Drawing Number : B&H/PPT/WRS001	

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Western Road Survey

N

Parking Design & Implementation

Brighton & Hove City Council

Project Title:

Western Road Red Route

Project Title:

Western Road Red Route
A0

Brighton & Hove City Council

Scale:	Original Drawing Size:	Date Drawn:
nts	A0	---
Drawn:	Checked:	Approved:
JE	---	---
Drawing status:	Drawing Number:	Rev:
INPRGS	BH/WRRRA0-01	---

Appendix 5

Summary of issues raised in the Pre-Action Protocol Letter and the Council's response.

Issue Raised	Response	Notes
Predetermination and Improper Purpose	Restate purpose in cabinet report to track congestion and improve bus journey times. This expectation is based on evidence from the implementation of sufficiently comparable previous red route schemes and is consistent with national and local policy on improving bus service provision. The long term expected net income is budgeted to be £50k annually, on an ongoing basis following a short-term spike from PCN issue. The use of an ETRO for Western Road is justified in line with the statutory provisions because it enables the Council to test the effectiveness of the proposed red route in a complex and heavily used urban environment, collect evidence on actual impacts, consider feedback from affected stakeholders, and make quick changes where necessary before deciding whether a permanent Traffic Regulation Order should be introduced. The proposals include warning letters and a period of non-enforcement to address potential early spiking of PCN liability during the initial weeks of the scheme.	Experience with the previous schemes shows a short-term spike in PCN income followed by a fall as compliance improves. £50k net surplus income on an ongoing basis is minimal in relation to the overall parking surplus of £23m.
Failure to consult fairly	There is no statutory duty to consult prior to the ETRO. Officers and Cllr Muten have carried out pre-engagement on the design of the scheme as well as the Your Voice consultation. The statutory consultation of the ETRO starts when the scheme is in place for a period of 18 months. The earlier informal consultation complied with legal requirements.	The consultation shows that a small majority of respondents felt that the proposals would improve safety and bus reliability.
Failure to discharge the Section 122 balancing duty	The Council considers that the section 122 balancing exercise strongly supports implementation of the Western Road ETRO. The primary aim is to improve bus journeys, alongside associated benefits including reduced congestion, improved road safety and more reliable public transport services. The proposed areas for stopping and loading have been designed in conjunction with the Council's Road Safety department and many visits with them have occurred during the design phase. It is a proper conclusion from previous experience and the information available to the Council that	Experience with previous red routes has shown a reduction in congestion and collisions, improved bus reliability and a small increase in footfall.

	introducing a scheme can be expected to increase materially and over time levels of footfall and improve materially and over time air quality as a result of reductions in congestion. The Council is content that issues in relation to access can be addressed by appropriate relaxations of the red route (in relation, for example, to disabled users) and the provision of disabled parking bays and loading bays. In short, the section 122 balance is amply met in this case. The Council considers that it favours the implementation of the ETRO so that a full evaluation of its impacts can take place	
Failure to discharge the public sector equality duty	The cabinet report explains that the EIA is a live document which will continue to be updated, and that the Council has had proper regard to its duties under section 149 of the Equality Act 2010. It states that improving public service provision, while making appropriate allowances and adjustments for disabled people and others who need to access the area, can positively advance equality. The Council highlights engagement and feedback from disabled action groups, which informed the provision of additional disabled parking bays along the route to ensure access to services within a 50-metre radius and will be monitored during the ETRO period.	There are exemptions for passengers to be dropped off on a red route.
Breech of legitimate expectation	The ETRO statutory scheme provides for a formal statutory consultation. That process has not yet started. there will be a further opportunity to be heard during the ETRO operation, should the scheme be made, with the benefit of stakeholders, as well as the Council, being able to fully evaluate the scheme in operation.	The ETRO provides an opportunity to rapidly adjust bays e.g. to improve access as required.
Misclassification as a non-key decision	The Cabinet Member Decision was classed as a non-key decision as it was to approve the plan to start the scheme whereas the key decision to design and implement the scheme was taken in March 2025.	By going back to Cabinet as key decision and including the consultation and other information this legal point is fully met.
Apparent bias	This is being addressed by the cabinet report being an officer report presented by the Corporate Director, rather than lead cabinet member report, and a fresh decision being taken by cabinet as a whole.	

Appendix 6: Project Chronology

2020 onwards

The Western Road corridor between Holland Road and Montpelier Road has experienced persistent issues associated with obstructive and antisocial parking, particularly around areas subject to waiting restrictions. The issue of poor parking has had an ongoing negative impact on bus journey times at this key pinch point and throughout the city. The route forms a key transport corridor carrying approximately 80 to 100 bus movements per hour at peak times or around 700 per day, together with significant pedestrian, servicing and general traffic activity. Enforcement activity has remained amongst the highest in the city. There are almost weekly complaints from members of the public to the city's enforcement line about large numbers of vehicles parked on double yellow lines in the area. In response there were 470 visits from enforcement officers from August 2025 to the end of March 2026 and 705 visits from April 2026 to the beginning of August 2026. During 2025/26, 684 Penalty Charge Notices were issued alongside 2,315 recorded Vehicles Driven Away during the observation period before a Penalty Charge Notice could be issued.

June 2021 (Local Transport Plan 5)

The Environment, Transport & Sustainability Committee approved the vision, key outcomes and principles for the development of the Council's fifth Local Transport Plan, now known as Our City Transport Plan 2035, and authorised public engagement on future transport priorities. The emerging plan identified objectives including increasing public transport use, improving road safety, reducing congestion, improving air quality, supporting active travel and creating a safe, inclusive and integrated transport network. The objectives of the Red Route programme support the delivery of these wider transport priorities.

22 June 2021 (Committee)

The Environment, Transport & Sustainability Committee under the previous administration considered the Network Management Action Plan. The Action Plan included proposals to introduce experimental Red Routes on strategic routes within the city together with additional traffic management and enforcement measures.

22 July 2021 (Policy and Resources Recovery Sub-Committee)

Committee agrees to the funding of £770,000 for additional staff to work in the Traffic Control Centre from 2022/23. This is to resource a Red Route trial, development of the LTP5 and the 2030 transport vision, CCTV enforcement of Mandatory cycle lanes, upcoming Moving Traffic Regulation powers, CCTV enforcement of Bus Lanes. As well as supporting the enforcement of a wider Ultra Low Emission Zone and Liveable (car free) City Centre. However, not all of these projects were progressed before the end of the term of the previous administration.

March 2022 (Local Cycling and Walking Infrastructure Plan)

The Environment, Transport & Sustainability Committee approved the Local Cycling and Walking Infrastructure Plan (LCWIP). The LCWIP identified opportunities to improve conditions for walking and cycling across the city and was developed using collision data, traffic data, area studies and consultation evidence. One of the objectives of the Red Route programme is to reduce obstructive parking in cycle lanes and on key transport corridors, improving safety and reducing conflicts between cyclists and parked vehicles. The objectives of the Western Road Red Route are consistent with the wider active travel and network management priorities set out in the LCWIP.

May 2023 (Brighton & Hove City Council election)

New Labour administration majority.

5 December 2023 (Committee)

The Transport & Sustainability Committee considered the outcomes of consultation on the Lewes Road, London Road and Preston Road Red Routes and approved progression to the Experimental Traffic Regulation Order stage for those schemes.

April 2024 (Implementation)

Experimental Red Routes were introduced on Lewes Road, London Road and Preston Road. The schemes were funded through the Department for Transport Bus Service Improvement Plan (BSIP) and were introduced primarily to improve bus reliability, reduce congestion and tackle antisocial parking on key transport corridors.

August 2024 (Case Study)

Transport for the Southeast (TfSE) published a case study on Brighton & Hove City Council's Red Route programme through its Centre of Excellence knowledge sharing platform. The case study highlighted the objectives of the scheme, including improving bus reliability, reducing congestion, tackling antisocial parking and supporting the efficient operation of key transport corridors. The publication provided external recognition of the Council's approach and shared lessons learned with transport authorities across the Southeast

April 2024 to March 2025 (ETRO Consultation period)

2025 (Our City Transport Plan 2035)

The Council continued development of Our City Transport Plan 2035, (LTP 5). The draft plan includes objectives to increase public transport use, deliver a safe and integrated transport system, promote active travel, reduce emissions and improve network efficiency. The objectives of the Western Road Red Route align with these wider strategic transport priorities.

20 March 2025 (Cabinet)

Cabinet considered the Red Routes Update report, reviewed monitoring data relating to bus passenger safety, air quality in London and Lewes Road. Cabinet approved the design and implementation of a Red Route on Western Road between Holland Road and Montpelier Road.

4 June 2025 (Brunswick & Adelaide LAT)

The proposed Western Road Red Route was discussed at the Brunswick & Adelaide Local Area Transport Meeting where local issues relating to access, loading, parking and operation of the corridor were considered.

Spring to Autumn 2025

Detailed design work commenced for the Western Road Red Route, including site surveys, traffic management design development, loading bay assessments, disabled parking assessments, engagement with transport operators, engagement with enforcement services, accessibility stakeholder engagement and scheme development.

10 September 2025

A Western Road Red Route map workshop was held with Local Area Transport representatives to review loading arrangements, parking provision, traffic management proposals and operational aspects of the proposed scheme.

24 November 2025 to 4 January 2026

A public consultation on the proposed Western Road Red Route was undertaken through the Council's Your Voice platform. More than 4,700 consultation leaflets were distributed to properties within the scheme area and surrounding streets. Your Voice Consultation on the proposal received 1,032 responses.

Headline figures
50% of respondents felt it would make the area safer
53% felt it would speed up bus journey times
56% felt it would keep traffic moving

January to May 2026

Consultation responses were reviewed and taken into account in the final scheme design. Further engagement took place with Brighton & Hove Buses, Stagecoach, Sussex Police, NSL, Cycling UK, Bricycles, Local Area Transport groups, ward councillors, businesses and residents.

24 April 2026 (Press release on existing Lewes & London Road Red Routes)

Following 2 years of implementation of the existing Red Routes a review was undertaken of the data available to assess the impact of the Lewes and London Road red route schemes. This identified improvements in bus reliability, reductions in bus passenger injury

incidents, reductions in collisions, improvements in air quality indicators and increased footfall within monitored locations.

12 June 2026

The Cabinet Member for Transport & City Infrastructure considered the report Permission to Proceed with Experimental Traffic Regulation Order for Western Road Red Route. The decision considered the consultation results, reviewed the completed scheme design, considered the Equality Impact Assessment and approved implementation of the Experimental Traffic Regulation Order.

Summer 2026

Implementation planning commenced for the Experimental Traffic Regulation Order, including Traffic Order preparation, signage and lining design, enforcement arrangements, communications planning and coordination with the planned Western Road resurfacing and reconstruction programme.

July to August 2026

Detailed planning commenced for the Western Road resurfacing and reconstruction scheme covering the section of Western Road between Holland Road and Montpelier Road. The project formed part of the Council's planned highway maintenance programme and involved substantially more extensive works than a standard resurfacing scheme due to the condition of the carriageway and the extent of reconstruction required.

August 2026

Trial holes, ground investigations and structural testing were undertaken to better understand the construction of the road and the load-bearing capacity of the underlying carriageway structure.

August 2026 (Construction Methodology)

A preferred traffic management approach based on a full road closures was identified as the safest and most efficient construction methodology for undertaking the reconstruction works.

August 2026 (Bus Diversions)

Planning commenced for bus diversion routes and wider traffic management arrangements associated with the resurfacing programme. Proposed diversion routes were developed in partnership with bus operators and transport stakeholders.

August 2026 (Business Engagement)

Initial engagement commenced with businesses regarding the resurfacing programme, including deliveries and servicing, loading arrangements, access to premises, customer access and measures to mitigate the impact of construction activity on businesses.

28 September 2026 to approximately 12 November 2026 (Planned)

Subject to weather conditions and unforeseen construction issues, the Western Road reconstruction and resurfacing programme is scheduled to commence on 28 September 2026 and continue for approximately 45 days. The works are expected to include utility investigations, carriageway reconstruction, drainage repairs, resurfacing, ironwork adjustment and temporary traffic management arrangements.

Autumn 2026 (Anticipated)

Subject to completion of all necessary legal and operational requirements, the Western Road Experimental Traffic Regulation Order is anticipated to be implemented. The programme is expected to include installation of road markings and signage, camera enforcement arrangements, an initial warning period before full enforcement commences, monitoring of loading bay usage, disabled parking provision and traffic flow, together with ongoing engagement with businesses, residents and accessibility groups throughout the experimental period.

Additional Meetings Featuring Red Route Agenda Items

Disabled Car User Advisory Group

The meetings listed below included either dedicated Red Route discussions or Red Route updates as part of the wider agenda. See report for details.

- 4 June 2025
- 26 September 2025
- 7 October 2025
- 22 October 2025
- 17 December 2025
- 4 February 2026
- 25 March 2026
- 17 June 2026
- 12 August 2026

Bus network operation meetings

Attended meetings where Red Routes were discussed, and updates given.

- 6 March 2025
- 3 April 2025
- 1 May 2025
- 5 June 2025
- 4 September 2025
- 2 October 2025
- 13 November 2025
- 4 December 2025
- 8 January 2026

- 5 February 2026
- 5 March 2026
- 2 April 2026
- 7 May 2026
- 4 June 2026
- 6 August 2026

BRIGHTON & HOVE CITY COUNCIL

CABINET

10.30am 17 SEPTEMBER 2026

COUNCIL CHAMBER, HOVE TOWN HALL

DRAFT MINUTES

Present: Councillor Sankey (Chair) Taylor (Deputy Chair), Alexander, Allen, Daniel, McGregor, Muten, Robins, Rowkins and Williams

PART ONE

57 UPDATE REPORT ON WESTERN ROAD RESURFACING WORKS AND RED ROUTE

57.1 Councillor Muten left the chamber for consideration of this item, in accordance with his earlier declaration of interest.

57.2 Cabinet considered the updated report, the published addendum, the public questions and deputations received, the Pre-Action Protocol correspondence, the updated Equality Impact Assessment and the proposed monitoring arrangements. Officers explained that the proposed Experimental Traffic Regulation Order (ETRO) would allow the Red Route to operate in real-world conditions before any decision on permanence, with evidence and feedback gathered throughout the experimental period. The scheme included 10 dedicated loading bays and additional disabled parking provision, with locations reviewed by road-safety officers and capable of being amended as the experiment progressed.

57.3 Officers advised that Western Road carried around 700 bus movements each day and continued to experience persistent obstructive stopping and parking despite existing restrictions and a high level of enforcement. They referred to more than 1,100 enforcement visits over the previous year, 684 Penalty Charge Notices and more than 2,300 occasions on which vehicles left before a penalty could be issued. Officers also corrected an error in the consultation appendix concerning the number of respondents recorded as "not sure" to one of the questions.

57.4 Councillor Taylor questioned officers in detail about the practical difference between the existing restrictions and the proposed Red Route. Officers confirmed that taxis and other vehicles would continue to be able to pick up and set down passengers, but that parking on the existing double yellow lines for shopping or other purposes was already prohibited. They explained that current enforcement required Civil Enforcement Officers to record vehicles and observe them for a period before taking action; where a number of vehicles were present this was resource intensive, and drivers could move away and return once officers had passed.

57.5 In response to questions about businesses and deliveries, officers explained that engagement had informed the proposed 10 loading bays, including the location of bays and the types and frequency of deliveries. They stressed that the advantage of an ETRO was its flexibility, unlike a permanent Traffic Regulation Order, bays and other elements could be moved, extended or otherwise altered quickly in response to evidence and experience during the experimental period. The use and location of loading bays, traffic flow and the operation of the corridor would therefore be kept under review.

57.6 Members discussed the concerns raised by businesses and residents and the potential impact on trade. Officers advised that monitoring would include business footfall and vacancy information, alongside transport and traffic data. They referred to anonymised mobile-phone footfall data used on existing Red Route corridors and said the same type of information would be available for Western Road. Engagement with businesses would continue before the ETRO was advertised and throughout the experimental period so that unintended effects could be identified and, where appropriate, the scheme adjusted.

57.7 Councillor Rowkins asked about current and proposed loading and disabled parking provision. Officers confirmed that there were no dedicated loading bays on the relevant section at present and that 10 would be introduced. They also advised that existing disabled bays in the adjoining side roads, together with proposed provision, would give approximately 20 disabled spaces in the area. Officers emphasised that engagement with disabled people and representative groups would be central to reviewing the scheme and that changes could be made during the ETRO.

57.8 Councillor Williams asked that the review consider the practical accessibility of disabled bays, including whether locations in side roads were suitable for people who could not easily manage gradients. Officers agreed that this was precisely the type of feedback to be tested with disability groups. Councillor Robins also highlighted the needs of disabled bus passengers, noting that obstructive loading or parking could prevent buses from reaching the kerb, and members discussed the need to balance the requirements of disabled motorists, disabled public-transport users, pedestrians, businesses and other road users.

57.9 Members reflected on the strong public campaign both for and against the proposal. Councillor Daniel said she had examined the issue closely and considered that the proposal was principally about making enforcement of existing restrictions more effective, while retaining lawful loading and passenger access. The Chair noted the extent to which the scheme had already evolved in response to feedback and emphasised the need for continued engagement, monitoring and adjustment. She considered that the existing level of unlawful stopping created safety and accessibility problems and that any scheme should seek to meet the needs of businesses, residents, disabled people and bus users while improving the operation of the corridor.

57.10 **RESOLVED:**

1) Cabinet notes the issues raised in the Pre-Action Protocol (PAP) correspondence, the updated Equality Impact Assessment, and the nature and scope of the proposed monitoring in relation to the primary aim of the scheme. The primary aim or purpose of the scheme is to reduce congestion in the area to allow for improved bus reliability during the experimental period.

2) Cabinet agrees to the implementation of the Experimental Traffic Regulation Order for Western Road between Holland Road and Montpelier Road should proceed, having reviewed this additional information.

3) Cabinet notes the resurfacing programme for this section of Western Road.

57.11 Councillor Muten returned to the meeting following determination of the item.

The meeting concluded at Time Not Specified

Signed Chair

Dated this day of

Decision:

1. Cabinet notes the issues raised in the Pre-Action Protocol (PAP) correspondence, the updated Equality Impact Assessment, and the nature and scope of the proposed monitoring in relation to the primary aim of the scheme. The primary aim or purpose of the scheme is to reduce congestion in the area to allow for improved bus reliability during the experimental period.

2. Cabinet agrees to the implementation of the Experimental Traffic Regulation Order for Western Road between Holland Road and Montpelier Road should proceed, having reviewed this additional information.

3. Cabinet notes the resurfacing programme for this section of Western Road.

The undersigned request that the published Decision on Item 57 in Cabinet of 17th September 2026 (Update Report on Western Road Resurfacing Works and Red Route) be called in as set out in the Council Constitution Overview and Scrutiny Procedure Rules, on the following grounds:

- 13.1.2 the absence of sufficient evidence on which to base a decision.

The reasons for use of these grounds for call-in are as follows:

- No Western Road-specific evidence supports the scheme's stated primary objective.
- The report's summary of the consultation was partial, and no written comments including those from businesses were provided.
- The loading provision is not tested against the council's own evidence of demand.
- The economic effect of the scheme is to be assessed only after it is in place.

We hope this provides sufficient basis on which to call this item in for consideration at a meeting of Place Overview and Scrutiny Committee.

Best wishes

Alistair McNair

Anne Meadows

Carol Theobald

Emma Hogan

Ivan Lyons

Ollie Sykes

Marina Lademacher

Pete West

Steve Davis

Ellen McLeay

Bruno de Oliveira

Chloe Goldsmith

Mark Earthey

Samer Bagaeen