



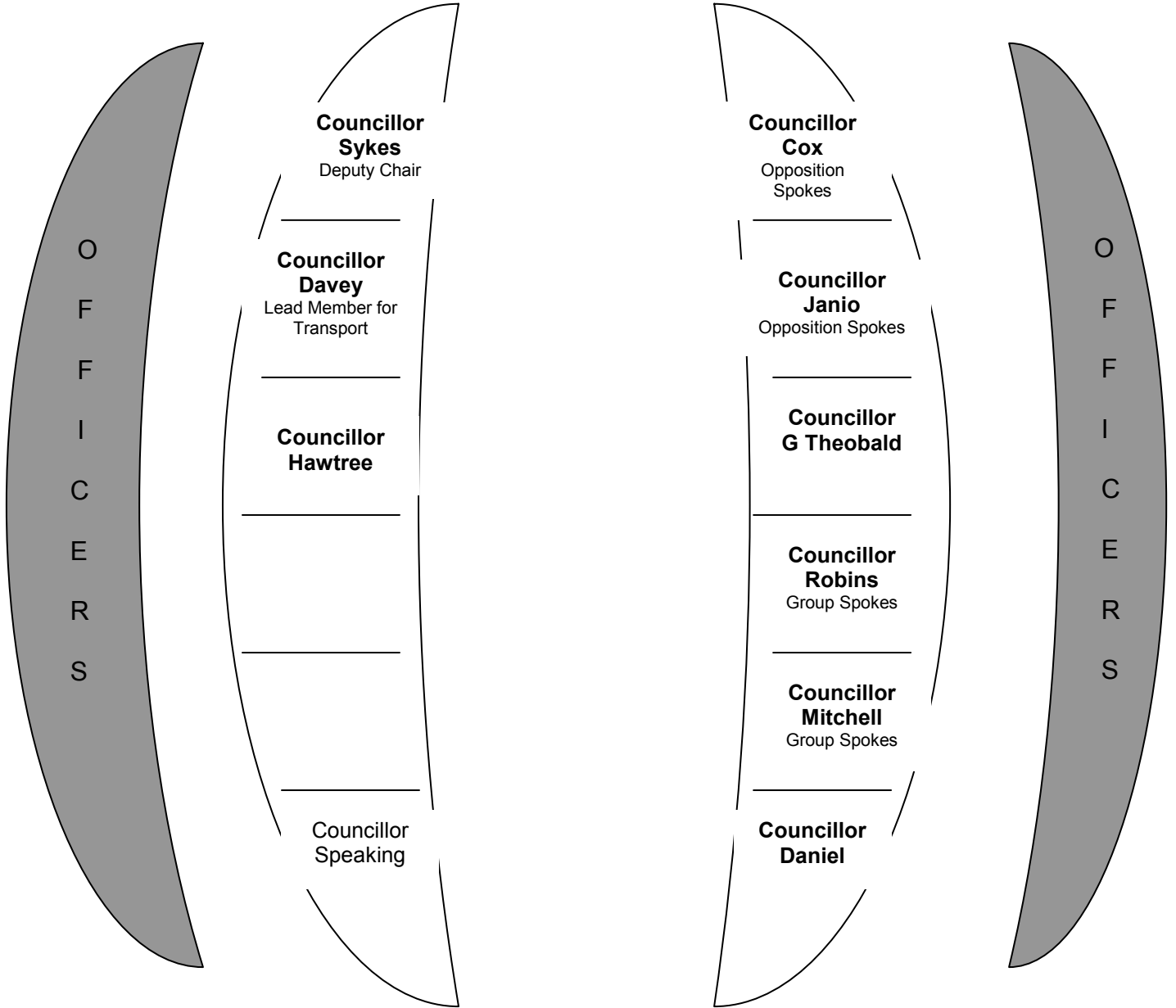
Brighton & Hove
City Council

Environment, Transport & Sustainability Committee

Title:	Environment, Transport & Sustainability Committee
Date:	4 March 2014
Time:	4.00pm
Venue	Council Chamber, Hove Town Hall
Members:	Councillors: West (Chair), Sykes (Deputy Chair), Cox (Opposition Spokesperson), Janio (Opposition Spokesperson), Mitchell (Group Spokesperson), Robins (Group Spokesperson), Daniel, Davey, Hawtree and G Theobald
Contact:	John Peel Democratic Services Officer 01273 29-1058 john.peel@brighton-hove.gov.uk
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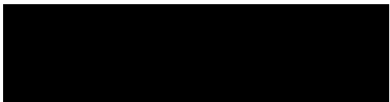
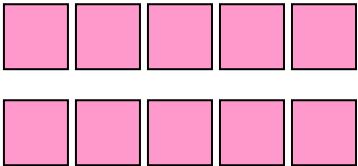
Democratic Services: Environment, Transport & Sustainability Committee

Legal Officer	Executive Director Environment, Development & Housing	Councillor West Chair	Democratic Services Officer
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Public Speaker	Public Speaker
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Public Seating



Press

AGENDA

PART ONE

Page

78. PROCEDURAL BUSINESS

- (a) **Declarations of Substitutes:** Where councillors are unable to attend a meeting, a substitute Member from the same political group may attend, speak and vote in their place for that meeting.
- (b) **Declarations of Interest:**
 - (a) Disclosable pecuniary interests not registered on the register of interests;
 - (b) Any other interests required to be registered under the local code;
 - (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

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

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

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

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and on-line in the Constitution at part 7.1.

79. MINUTES

1 - 20

To consider the minutes of the meeting held on 14 January 2014 (copy attached).

Contact Officer: John Peel

Tel: 29-1058

80. MINUTES OF THE PREVIOUS MEETING OF THE CITY SUSTAINABILITY PARTNERSHIP (FOR INFORMATION) 21 - 26

Minutes of the previous meeting held on 22 January 2014 (copy attached).

81. CHAIRS COMMUNICATIONS

82. CALL OVER

- (a) Items (86 – 96) will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) Those items not reserved will be taken as having been received and the reports' recommendations agreed.

83. PUBLIC INVOLVEMENT 27 - 44

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

- (a) **Petitions:** To receive any petitions presented by members of the public.
 - (i) 20mph limit in the Hollingbury and Braybon area- Hugh Woodhouse
- (b) **Written Questions:** To receive any questions submitted by the due date of 12 noon on the 25 February 2014.
 - (i) Dyke Road Park proposals- Mavis Aldridge
 - (ii) Dyke Road Park proposals- Jason Brooks
- (c) **Deputations:** To receive any deputations submitted by the due date of 12 noon on the 25 February 2014.
 - (i) Dyke Road cycling and pedestrian improvements- Janet King
 - (ii) Safety Concerns - Dyke Road pedestrian and cycle facilities proposals- Alison Heal
 - (iii) Creation of new Residents Parking Zone E- Peter Meekings
 - (iv) Request that Preston Drove, Stanford Avenue and Surrenden Road are included in the 20mph Speed Limit programme in Brighton and Hove (Phase 2)- Becky Reynolds

84. ITEMS REFERRED FROM COUNCIL

45 - 46

- (d) **Petitions:** To receive petitions referred from Full Council.
- (i) 20mph limit on Preston Drove, Stanford Avenue and Surrenden Road- Becky Reynolds
 - (ii) Dyke Road pedestrian and cycle lane plans- Councillor Bennett
 - (iii) Postpone enforcement on Elm Grove until substantially more safe and legal parking is created- Tanya Richardson

85. MEMBER INVOLVEMENT

47 - 50

To consider the following matters raised by Members:

- (e) **Petitions:** To receive any petitions
- (f) **Written Questions:** To consider any written questions;
- (g) **Letters:** To consider any letters;
- (i) Speed limits on Stanford Avenue, Preston Drove and Surrenden Road- Councillors Jones, Kennedy, Littman
 - (ii) Speed limits on Surrenden Road- Councillor Shanks
- (h) **Notices of Motion:** to consider any Notices of Motion referred from Full Council or submitted directly to the Committee.

ENVIRONMENT & SUSTAINABILITY MATTERS

86. ADOPTION OF ALLOTMENT STRATEGY

51 - 170

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Jan Jonker
Ward Affected: All Wards

Tel: 29-4722

87. OFFICIAL FEED AND FOOD CONTROLS SERVICE PLAN 2014/15

**171 -
198**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Nick Wilmot
Ward Affected: All Wards

Tel: 29-2157

88. HEALTH AND SAFETY SERVICE PLAN 2014-15 **199 - 216**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Roy Pickard Tel: 29-2145
Ward Affected: All Wards

TRANSPORT & PUBLIC REALM MATTERS

89. BRIGHTON AND HOVE 20MPH LIMIT PHASE 2 - OBJECTIONS TO SPEED LIMIT ORDERS **217 - 274**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Emma Sheridan Tel: 293862
Ward Affected: All Wards

90. DYKE ROAD PED & CYCLE FACILITIES: OBJECTIONS TO TRO

Report of the Executive Director of Environment, Development & Housing (copy to follow).

Contact Officer: Abby Hone Tel: 29-0390
Ward Affected: Hove Park; Preston Park; Withdean

91. AREA E PARKING SCHEME - PRESTON PARK STATION NORTH TRAFFIC ORDER CONSULTATION **275 - 302**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Charles Field Tel: 29-3329
Ward Affected: Withdean

92. WISH WARD RESIDENT PARKING SCHEME CONSULTATION. **303 - 324**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Charles Field Tel: 29-3329
Ward Affected: Wish

93. PROPOSED AMENDMENTS TO VERGE & FOOTWAY PARKING RESTRICTIONS **325 - 342**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Owen McElroy *Tel:* 29-0368
Ward Affected: North Portslade; Patcham

94. PRESTON PARK TRIANGLE INFORMAL CONSULTATION **343 - 388**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Owen McElroy *Tel:* 29-0368
Ward Affected: Preston Park; Withdean

95. NORTON ROAD CAR PARK ~ SUNDAY TARIFF **389 - 392**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Austen Hunter *Tel:* 01273 292245
Ward Affected: Central Hove

96. BAND OF INTEREST AFFECTING PROPERTIES IN CHEAPSIDE **393 - 398**

Report of the Executive Director of Environment, Development & Housing (copy attached).

Contact Officer: Andrew Renaut *Tel:* 29-2477
Ward Affected: St Peter's & North Laine

97. ITEMS REFERRED FOR FULL COUNCIL

To consider items to be submitted to the 27 March 2014 Council meeting for information.

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

ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE

The City Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public. Provision is also made on the agendas for public questions to committees and details of how questions can be raised can be found on the website and/or on agendas for the meetings.

The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fifth working day before the meeting.

Agendas and minutes are published on the council's website www.brighton-hove.gov.uk. Agendas are available to view five working days prior to the meeting date.

Meeting papers can be provided, on request, in large print, in Braille, on audio tape or on disc, or translated into any other language as requested.

For further details and general enquiries about this meeting contact John Peel, (01273 29-1058, email john.peel@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

Date of Publication - Monday, 24 February 2014

BRIGHTON & HOVE CITY COUNCIL
ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE

4.00pm 14 JANUARY 2014

COUNCIL CHAMBER, HOVE TOWN HALL

MINUTES

Present: Councillor West (Chair), Councillor Sykes (Deputy Chair), Cox (Opposition Spokesperson), Janio (Opposition Spokesperson), Mitchell (Group Spokesperson), Robins (Group Spokesperson), Daniel, Davey, Hawtree and Wealls

Other Members present: Councillors Hyde, Mears

PART ONE

59. PROCEDURAL BUSINESS

59(a) Declarations of substitutes

59.1 Councillor Wealls declared that he was in attendance as substitute for Councillor Theobald.

59(b) Declarations of interest

59.2 Councillor Mitchell declared a non-pecuniary interest in Item 73 as she had chaired meetings of the Brighton & Hove Estates Conservation Trust who leased some properties located in Stanmer Park.

59.3 Councillor West declared a non-pecuniary interest in Item 73 as he was a Trustee of the Brighton & Hove Estates Conservation Trust and represented Brighton & Hove City Council on the South Downs National Park Authority.

59.4 Councillor Sykes declared a non-pecuniary interest in Item 76 as he was currently employed by the Environment Agency and had previously viewed the flood risk management strategy in that capacity.

59.5 Councillor Cox declared a non-pecuniary interest in Item 67 due to his current role as secretary for Brighton & Hove Cricket Club who leased pitches from Brighton & Hove City Council.

59.6 Councillor Janio declared a non-pecuniary interest in Item 67 as his wife currently held a traders permit.

59(c) Exclusion of press and public

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

59.8 **RESOLVED-** That the press and public not be excluded.

60. MINUTES

60.1 **RESOLVED-** That the minutes of the previous meeting held on 26 November 2013 are approved as the correct record.

60.2 With reference to item 57.27 of the minutes of the special meeting held on 11 December 2013, Councillor Hawtree stated that Councillor Janio description of him being a “straw chewing agrarian” be added to the minutes.

60.3 Councillor Robins stated that item 57.24 incorrectly used the word *limits* on sentence seven and should be removed. Furthermore, Councillor Robins requested that *per annum* be removed from sentence eight as this was not the correct definition.

60.4 **RESOLVED-** That the minutes of the previous special meeting held on 11 December be approved as the correct record subject to the above amendments.

61. MINUTES OF THE PREVIOUS MEETING OF THE CITY SUSTAINABILITY PARTNERSHIP (FOR INFORMATION)

61.1 **RESOLVED-** That the minutes of the previous meeting of the City Sustainability Partnership held on 21 November 2013 be noted.

62. CHAIRS COMMUNICATIONS

62.1 The Chair provided the following communications:

“Last month saw the launch of WARPit, a website that council staff can use to redistribute resources such as furniture, fixtures and fittings and stationery. All items are free, so WARPit can make significant savings on purchasing. It also avoids waste disposal costs, stops usable items going for disposal and reduces carbon emissions.

The site launched a month ago and already has over 100 members, saved over a tonne of CO₂ and £1880.

Congratulations to Deputy Head, Nigel Watson who has been awarded the national Modeshift Award for his ‘Contribution to Sustainable Travel to School’. Nigel, together with the Good Life Reps, have worked hard to encourage more families to walk, scoot

and cycle to school and as a result are also the first school in the city to achieve a Silver STARS award for reducing the number of people driving to school through their [School Travel Plan](#). They also achieved the Sustrans 'Gold Bike It' Award earlier this year. The council was awarded an Honourable Mention in the World Green Building Council's Government Leadership Awards. This was for our planning guidance which highlights the opportunities to grow food in buildings, such as on rooftops, balconies and walls. A number of initiatives around in the city have been contributing to achieving our One Planet City objectives. Case studies have been developed to example how each of the 10 One Planet principles are being met. One example offered is the partnership proposal developed by the Saltdean Lido CIC which is seeking to employ carbon and cost efficient energy solutions, sustainable water and site waste management measures.

Other case studies cover development of a fair trade film by pupils of Cottismore school; the range of benefits and achievements of the Level redevelopment including the highly sustainable new café Velo; and the on-going great achievements of the Harvest project which has been named 'best community food growing project' in the Local Food Awards.

I will ask officers to circulate to members the full list of case studies as I can't do justice to those achievements here.

And finally, I would like to offer members the opportunity to join with me in congratulating staff and our contractors Wettons for their tremendous achievements in scooping so many awards at the Loo of the Year Award. As one officer remarked to me, "we wiped the floor at the award ceremony", taking awards for toilets in crematoriums and historic buildings, and for our public toilets. We become the premier league winners, the championship league winners, and overall Loo of the Year Award winners 2013. This tremendous achievement was complemented by the recognition of individual high standards attained in our 34 inspected public loos, 18 of which received 18 platinum and 16 gold awards.

Well done and thank you to everyone that has contributed to this success; it is very important and reassuring to residents and visitors to know they can depend on our high quality services".

63. CALL OVER

63.1 The following items on the agenda were reserved for discussion:

- Item 67: Fees & Charges 2014/15
- Item 68: Low Emission Zone- Central Brighton
- Item 69: Old Town Transport Plan
- Item 72: Vogue Gyratory Improvements
- Item 73: Stanmer Park- Permission to consult on Master Plan in preparation for Heritage Lottery Fund grant application

63.2 The Democratic Services Officer confirmed that the Items listed above had been reserved for discussion; and that the following reports on the agenda with the recommendations therein had been approved and adopted:

- Item 70: 'The Common Room' (Ann Street/Providence Place) Results of public consultation and next stages

- Item 71: Surrey Street loading bay Traffic Regulation Order
- Item 74: East Brighton Park proposals for a controlled parking scheme
- Item 75: Introduction of Licence Scheme with charges for fitness trainers using public green spaces
- Item 76: Brighton Marina to River Adur flood and coastal erosion risk management strategy

64. PUBLIC INVOLVEMENT

(a) Petitions

(i) Coach parking Roedean- Victor Mower

- 64.1 The Committee considered a petition signed by 159 people requesting the council to implement a Traffic Regulation Order banning HGV's and coaches except for access on The Cliff, Cliff Road, Cliff Approach, Roedean Crescent, Roedean Way, Roedean Vale and Roedean Heights due to noise and air pollution, obstructions, safety concerns and overall negative impact of the above on the area.
- 64.2 The Chair provided the following response:
- “Officers dealing with Coach parking facilities and local issues are aware of the concerns of residents and are looking at the options available. When the matter was raised by councillors last year I visited with officers to look at the situation. I know that Officers have also met with representatives of the local resident association and I am sympathetic to the concerns of residents.
- We will be considering the wider issue of Coach Parking across the City as part of the next Local Transport Plan. That plan is being developed this calendar year and public views on a range of transport questions facing the city will be very helpful to developing the approaches the plan will set out. The plan will be open to public consultation before being agreed by members of the committee”.
- 64.3 Councillor Cox stated that he did not believe the response provided was adequate. Councillor Cox added he did not accept that displacement would necessarily arise and that residents had made a simple, reasonable request of the Committee to examine problems associated with coach parking in a distinct area. Councillor Cox moved a motion to call for an officer report on the matter.
- 64.4 Councillor Wealls formally seconded the motion.
- 64.5 Councillor Mitchell stated that she supported the motion which would help clarify matters and perhaps provide a potential way forward on a long-running issue.
- 64.6 The Chair stated that whilst he was sympathetic to the request, the Committee had to be conscious of the workload of officers in requesting a report.
- 64.7 Councillor Davey stated that the authority did not have the power to prohibit coach parking in the area and therefore would need input on the issue from Sussex Police.

- 64.8 The Chair stated his preference for a report that would inform the wider Local Transport Plan 4 (LTP4) as the issue of coach parking provision needed to be addressed through that process.
- 64.9 The Deputy Head of Law clarified that the Committee could call for a report on the matter however, unless there was a clear, urgent need to do so, that report was not formally required to be submitted to the next meeting of the Committee, particularly the if full information could be gathered in that timeframe.
- 64.10 Councillor Mitchell stated that she agreed the issue of potential coach parking sites should be examined as part of the LTP4 process however; the request identified in the petition was to consider a ban on specific streets which was a different matter and a report should be brought back to the Committee.
- 64.11 Councillor Janio requested that the motion for a report to be brought back to the Committee be put to the vote.
- 64.12 The Chair called an adjournment to the meeting at 16.28.
- 64.13 The Chair resumed the meeting at 16.33.
- 64.14 The Chair stated that he had been provided procedural clarification on the matter and requested agreement from the Committee that an officer report on the specific request in the petition be submitted to the Committee once that information was available.
- 64.15 **RESOLVED-** That the Committee call for an officer report on the matter.

65. ITEMS REFERRED FROM COUNCIL

(a) Petitions

(i) **20mph limit on Medina Terrace, King's Esplanade and St Aubyn's South-Councillor Hawtree**

- 65.1 The Committee received a petition signed by 121 people requesting the speed limit on Medina Terrace, King's Esplanade and St Aubyn's South be reduced to 20mph in order to increase road safety and also to improve their alignment with several cycle path junctions. The petition had been referred from the meeting of Full Council on 12 December 2013.

- 65.2 The Chair provided the following response:

"It is planned to incorporate and carry out an assessment of St Aubyn's South as part of the next phase (Phase 3) of the City-wide 20mph Speed Limit Programme. The results of data collection and analysis will be included in a wider public consultation before the results are presented to a future Environment Transport & Sustainability Committee before any decision is taken to change existing speed limits".

- 65.3 **RESOLVED-** That the petition be noted.

(ii) Parking in Grenadier, Hangleton- Councillor Janio

65.4 The Committee received a petition signed by 140 people requesting council officers to design and implement a more robust parking system in the Grenadier area of Hangleton. The petition had been referred from the meeting of Full Council on 12 December 2013.

65.5 The Chair provided the following response:

“I visited this location last week with a council officer to meet with Councillors Janio and Barnett, the local ward councillors, and see first-hand the problems that are being experienced.

I’m glad to report that we will be carrying out some works very soon to alleviate any confusion over where to park. The bays on the west side of Applesham Avenue, including the loading bay, will be re-marked as the lines are currently quite faded; the loading bay will have a new sign, showing its times of operation between 8 a.m. and 6 p.m; a new disabled bay will be installed on the west side of Applesham Avenue, with correct markings and signage. This means that disabled bays will be on both sides of the Parade/Queen’s Parade, offering better access to all the shops for those with mobility issues.

As a new bay is being created, the disabled bay east of the zebra crossing on Queen’s Parade will be removed, to free space up for other parking but the disabled bay nearest to the junction will be retained.

Both disabled bays will be limited to a 3-hour maximum stay.

I am aware that Councillor Barnett has already been dealing with Tesco’s on the issue of their delivery lorries staying for long periods of time in the loading bay and am sure that keeping up this pressure on the shop will help.

However, targeted enforcement will now take place in this area, particularly aimed at delivery lorries or other vehicles that overstay on limited parking/loading bays.

Parking enforcement has also been alerted to the problem of cars parking over driveways, and ward councillors have been given the enforcement hotline number to report this for a rapid response.

Together I believe these initiatives will go some way to help improve a difficult situation which comes about as a result of ever increasing parking pressure”.

65.6 **RESOLVED-** That the petition be noted.

66. MEMBER INVOLVEMENT**(a) Petitions****(i) Brunswick Place taxi rank- Councillor Sykes**

66.1 Councillor Sykes submitted a petition signed by 14 people that requested the council to address noise disturbance, pollution from idling engines and road safety associated with the taxi rank on Brunswick Place.

66.2 **RESOLVED-** That the petition is received by the Committee.

(i) Written Questions**(i) Driving and parking on the pavement- Councillor Cox**

66.3 Councillor Cox presented the following question:

“Ward councillors continue to receive complaints about cars being driven and parked on the pavement –in particular outside St Peter’s Church in Portland Road, and on the Kingsway outside the front of the King Alfred. This practice causes fear amongst vulnerable people using the footpath, and damages the pavement itself, causing trip hazards and expense to the Council.

It is widely believed parking and driving on the pavement is illegal. The Police advise that enforcement action can only be taken by parking wardens. The Council Parking Service advise that enforcement action can only be taken by the Police.

What action do the Council intend to take to deal with this matter?”

66.4 The Chair provided the following response:

“Parking and driving on the footway can be a nuisance and is dealt with under specific legislation where enforcement action can only be carried out by the appropriate agency. Broadly vehicles being driven on or causing obstruction by parking across the footway are dealt with by the Police under powers operated by them within The Road Safety Act 1984, The Road Traffic Act 1988 and Construction & Use Regulations 1988.

Where vehicles are parked on the footway next to waiting restrictions such as double yellow lines at junctions then the Council’s Parking Service can issue Penalty Charge Notices.

In reality the Council works very closely with Sussex Police colleagues and often has to adopt a joined up approach to enforcement where these issues are not straight forward and boundaries are blurred in specific locations. A good recent example of this was the joint enforcement undertaken in Elm Grove.

In the case of Portland Road and King Alfred the Council will continue to deal with parking infringements within its existing powers. The public can also report anti-social parking obstruction or driving issues to Sussex Police directly through Operation Crackdown via their website www.operationcrackdown.org with specific details of the vehicle or incident or alternatively on the phone number 01243 642222 during office hours and speak to an operator.

I too am concerned about the problems caused by driving and parking on the footway and verge, and appreciate that this is a concern shared by many other members and residents. I do think more needs to be done to tackle this.

I am therefore asking officers to set up a cross party working group to include a representative from Sussex Police to discuss the issues of verge and footway parking on the city, possible solutions whether they are site or area specific or citywide, and the impact of the two pilot verge parking schemes now operating”.

(ii) Safety on the junction of Church Road/New Church Road and Sackville Road/Hove Street- Councillor Hawtree

66.5 Councillor Hawtree presented the following question:

“Over Christmas, there was another collision- and terrible injury- at the junction of Church/New Church Road and Sackville Road/Hove Street.

This junction has long been problematic. It is neither an easy one for pedestrians in general nor for drivers who are turning right.

In the latter case, some make a bolt for it in that interval while the light is amber returning to red.

As councillor for one of the wards which meet at this junction, I should like this to be studied as part of the next Local Transport Plan, popularly known as LTP4, which will run from 2015, with preliminary work undertaken this year”

66.6 The Chair provided the following response:

“Councillors and officers are naturally very sorry to learn of the road traffic collision on Christmas Day which, according to media reports, resulted in an injury to a taxi vehicle driver and a teenage passenger and its sympathies are with those involved.

The Council has a statutory duty under Section 39 of the Road Traffic Act 1988 to study road accidents and take such measures as appear to be appropriate to prevent them from occurring. (Road Traffic Act 1988 Section 39)

To ensure that the Council's resources are targeted in the most cost effective manner, officers use police road collision reports and consider collision trends over statistically robust time periods to avoid reacting to individual cases.

In accordance with our agreed approach officers will investigate the reported collision at this location within the rolling programme of investigations and will bring forward any proposed measures considered likely to prevent this type of occurrence being repeated at this location, to a future meeting of Environment, Transport & Sustainability Committee for consideration”.

67. FEES AND CHARGES 2014/15

67.1 The Committee considered a report of the Executive Director of Environment, Development & Housing that set out the proposed fees and charges for the service areas covered by the Committee for 2014/15.

67.2 Councillor Robins referred to the proposed changes to London Road car park tariffs which had a minimal increase and asked if it would not be more straightforward to retain the existing charges for the benefit of clarity as the proposals appeared unnecessarily complex.

67.3 The Head of Transport replied that the key factor in the proposals was to reduce over occupancy which had become a significant factor at the car park.

67.4 Councillor Wealls noted the new tariffs at Regency Square car park and asked if they might be prohibitive to those people arriving at 4pm to check in at hotel accommodation and staying overnight.

67.5 The Head of Transport stated that it was proposed to introduce the new tariff as there was an overlap between the evening rate and overnight rate in the existing system. The Head of Transport added that there would be a marginal reduction in the overall charge for an overnight stay under the proposed new fee.

- 67.6 Councillor Hawtree requested more information on the cultivation licence, a function he would like to see more of and for confirmation that visitor permit charges were increased from £1 to £2 in 2008.
- 67.7 The Head of Transport confirmed that there had been an increase in visitor parking permit charges in 2008 from £1 to £2 and explained that the cultivation licence put in place a robust regime of insurance as offices were mindful of objects on verges or other highway green space that may cause damage to vehicles.
- 67.8 Councillor Cox formally moved a motion to add an additional recommendation as shown in bold italics below:

2.3 That scaffolding charges are only increased in line with the inflation rate of 2.5%

- 67.9 Introducing the amendment, Councillor Cox stated that the increase of 9.1% had been justified on the basis that it brought the charge up to the average level charged by other authorities across the country. However, Councillor Cox believed this did not account for the overall impact of other charges made by the authority such as traders permits and parking charges that were amongst the highest in the country and a detriment to local businesses. Councillor Cox stated that that a 9.1% rise in scaffolding licence charges would place further burden on traders and was an unnecessary tax.
- 67.10 Councillor Janio formally seconded the motion.
- 67.11 The Head of Transport stated that the amendment was not unreasonable and could be implemented by officers if passed.
- 67.12 The Chair clarified that the amendment would increase the existing charge by £1.37 rather than the £5 proposed in the report.
- 67.13 Councillor Sykes stated that the increase in the cost of traders permits had only brought the authority in line with the charges made by neighbouring authorities and therefore, he did not believe there was sound justification to the motion.
- 67.14 Councillor Janio stated that he believed any increase imposed on traders had a significant impact.
- 67.15 The Chair then put the motion to the vote with the following outcome:
- For: 3
Against: 4
Abstentions: 3
- 67.16 Therefore the motion was not carried.
- 67.17 **RESOLVED-** That Committee approves the proposed fees and charges for 2014/15 as set out within the report and its appendices.

68. LOW EMISSION ZONE - CENTRAL BRIGHTON

- 68.1 The Committee considered a report of the Executive Director of Environment, Development & Housing that set out the results of the investigation into the introduction of a Low Emission Zone (LEZ) as requested by the Committee in July 2013 and proposals for implementation in Brighton & Hove.
- 68.2 Councillor Cox referred to paragraph 7.5 of the report that outlined the risk of public inquiry if objections were received from the bus companies to the Traffic Regulation Order (TRO) advertised by the Traffic Commissioner. Councillor Cox asked for further clarification on the matter and if the risk of a Public Inquiry was low particularly in view of the letter of support received by the Committee from the Chief Executive of Brighton & Hove Bus Company.
- 68.3 The Policy & Development Manager clarified that the financial implications of a Public Inquiry in the event of objections from a bus operator would be a potential cost of £20,000 to the authority. However, there had been extensive discussions with the local bus companies to reduce that risk as far as possible. The Policy & Development Manager added that should there be any objections to the TRO from a bus company, there would be opportunity to present these to Committee for consideration.
- 68.4 The Chair stated that it was indicated in the report and in the letter received from the Chief Executive of Brighton & Hove Bus Company that the proposals had the support of local bus companies.
- 68.5 Councillor Robins stated that he was unsure why the target for implementation had been set at 2015 as he understood that stipulation had been removed from the recommendations of the report previously received by the Committee.
- 68.6 Councillor Davey stated that he recalled that the Committee had made a commitment that work, including discussions with relevant partners begin and that a report on that matter and possible implementation be brought back to the Committee later in the year. Councillor Davey stated that the investigation and discussion was now complete allowing the Committee an opportunity to consider the report.
- 68.7 Councillor Wealls stated that his expectation was that with a third of buses operating in the proposed LEZ area Euro 5 compliant, that there would be a corresponding drop in emissions. However, as the table on page 53 of the agenda demonstrated, there had in fact been a 30% rise in that area over the past five years.
- 68.8 The Senior Technical Officer stated that the graph provided highlighted ambient concentrations of nitrogen dioxide levels rather than tailpipe data so would not highlight the impact of cleaner bus technology alone. The Policy & Development Manager added that the intention was for officers to gather tailpipe data which would help with identifying specific measures with regard to reducing emission levels.
- 68.9 Councillor Wealls stated that he was requesting clarification on expectations for a LEZ as the graph appeared to provide evidence that an improvement in bus technology over the past five years had not produced the expected improvement in air quality.

- 68.10 The Policy & Development Manager stated there were other factors that had contributed to the increase in nitrogen dioxide levels including several cold winters and an increase in other background levels. The Policy & Development Manager stated that evidence showed more widespread use of Euro 5 buses would certainly be an improvement on the current Euro 2 buses used.
- 68.11 Councillor Davey stated that the expectations were that the proposals would contribute to a much wider package of measures to reduce poor air quality. Councillor Davey added that if the proposals were accepted, there would be opportunity for the Committee to assess the impact of a LEZ sometime next year when the scheme was in place and more data and evidence was available. Councillor Davey claimed that the proposals were an opportunity to the Committee to make a real benefit to the city with one of the most successful bus services in the country. Furthermore, it would meet the objective to increase public transport services as well as road safety and air quality.
- 68.12 Councillor Mitchell welcomed the report adding her praise for Brighton & Hove Bus Company who she believed deserved enormous credit for supporting and eventually implementing the proposals which would involve significant work. Councillor Mitchell added that she was aware that local taxi companies were also willing to enter discussions on licensing measures to reduce emissions that should also be welcomed. Councillor Mitchell expressed her hope that discussions might eventually also include HGV operators. Councillor Mitchell supplemented that she was pleased tailpipe emission data would be collected and hope the results of that study would be reported when available.
- 68.13 The Chair re-iterated the comments made by Councillor Mitchell in acknowledging the credit due to Brighton & Hove Bus Company for their work and commitment.
- 68.14 Councillor Cox stated his praise for Councillor Davey for the work he had put into a potential scheme that had seen a positive result. Councillor Cox added his praise for Brighton & Hove Bus Company and for central government who had provided £750,000 to support the introduction of cleaner bus technology. Councillor Cox supplemented that he certainly did not expect a rise in fares associated with the introduction of Euro 5 buses as that would be counter-productive to efforts to reduce emissions in the city. Councillor Cox noted his support for the exemption of rural bus services from the scheme and expressed his hope that the measures might lead to consideration for alternative bus routes, in particular along the seafront.
- 68.15 Councillor Robins enquired if enforcement would be similar to the scheme in London that used photo recognition of number plates.
- 68.16 The Policy & Development Manager stated that the proposed scheme would be enforced by the council's CCTV network. Any issues would first be brought to the bus operator's attention for appropriate action. In the event of persistent non-compliance the matter could be reported to the Traffic Commissioner who can issue fines for failure to comply with the Traffic Regulation Condition.
- 68.17 Councillor Sykes welcomed the proposals that would be one of a number of measures used to improve air quality levels. Councillor Sykes noted that the cities air quality

standard currently contravened EU regulations and there was an urgent need to undertake such measures to become compliant and avoid significant financial penalty.

- 68.18 Councillor Janio stated his agreement that there was an urgent need to introduce measures to improve air quality in the city. Councillor Janio stated that he disagreed that air quality should be assessed on tailpipe data alone and that other variables should also be accounted for. Councillor Janio enquired as to what other measures were being considered.
- 68.19 The Chair stated his agreement with Councillor Janio's comments adding that there would be a series of measures in addition to an LEZ brought to Committee over the next few years. The Chair asked that officer briefings be offered to assist Members with specific questions.
- 68.20 Councillor Daniel requested that the comments made by Councillor Janio be addressed as they were pertinent to the debate.
- 68.21 The Senior Technical Officer stated that there was currently a high level of work being undertaken assessing the wide number of contributors to poor air quality. The Senior Technical Officer added that transport emissions were central to this noting that background levels of nitrogen dioxide taken in the Pavilion Park measured 25 hg/m3 whilst the key transport corridor of North Street, which was only a short distance away, measured 75hg/m3.
- 68.22 **RESOLVED-**
1. That the Committee declares a Low Emission Zone in Castle Square, North Street and Western Road as far as the junction with Holland Road, with the aim of ensuring that all Public Service Vehicles to meet, as a minimum the Euro 5 emissions standard by 1 January 2015, with only licensed exemptions to this requirement as set out in this report.
 2. That officers are authorised to further consult with bus operators, DEFRA and the Department for Transport with a view to making an application to the Traffic Commissioner for a Traffic Regulation Condition to establish the regulatory framework for the Low Emission Zone
 3. That the Committee notes that officers will consult with taxi drivers on a range of specific proposals and initiatives to reduce taxi emissions for the consideration of the Licensing Committee.

69. OLD TOWN TRANSPORT PLAN

- 69.1 The Committee considered a report of the Executive Director of Environment, Development & Housing that summarised the report of the Planning Inspectorate that was received following a Public Inquiry into the Old Town Transport Plan proposals and outlined recommendation to move the project forward.
- 69.2 Councillor Mitchell stated that she had found the report recommendations extremely confusing. Councillor Mitchell clarified that the Committee were requested to proceed

with the advertisement of a TRO for East Street even though the Planning Inspector had stated their concerns for an increase in traffic flow through Little East Street. Councillor Mitchell supplemented that there was no reference to any consultation for the introduction of safety measures in Little East Street intended to mitigate any increase in traffic flow nor were there any plans. Councillor Mitchell stated that had she had huge reservations about approving the closure of East Street without viewing or considering the proposed safety measures for Little East Street beforehand. Councillor Mitchell supplemented that her group could not support the proposals without any indication of local support or demonstration of cause and effect on Little East Street. Councillor Mitchell added that she was unclear why the Committee were requested to approve the TRO for Prince Albert Street when the recommendations clearly set out that further monitoring of Ship Street was necessary before implementation. Councillor Mitchell stated that timescales for implementation were extremely tight and suggested that the report be deferred to the meeting on 29 April 2013 so that a fuller picture of the measures could be considered.

- 69.3 Councillor Robins stated that he had been provided a briefing on the Plan that had bore no relation to the report currently being considered. Councillor Robins clarified that he understood only two small areas were being considered for implementation with the remainder subject to further monitoring.
- 69.4 The Project Manager stated that the Planning Inspectorate had not agreed with the benefits the council had put forward for the closure of Prince Albert Street and had not been convinced about the potential increase in rat-running east to west through the Old Town area. Therefore, it was recommended that the Order be postponed and reviewed in order to assess any impact of the implementation of the Ship Street closure and for further monitoring.
- 69.5 Councillor Mitchell expressed her belief that, on the basis of the recommendations of the Planning Inspectorate, a temporary TRO for Ship Street should be used to monitor rat running through Old Town rather than permanent closure.
- 69.6 The Chair stated that the Committee has passed the majority of the proposals for the Old Town area some time ago and the report outlined minor alterations after consideration by the Planning Inspectorate.
- 69.7 Councillor Mitchell clarified that her group had not supported the previous report as they had been concerned about the cost of a Public Inquiry.
- 69.8 Councillor Cox stated that there had been a different proportionality to the Committee when the item had previously been considered and approved and clarified that he had voted against the proposals. This was on the basis that the cost of a Public Inquiry could not be justified, that he had believed the money available should have been diverted to other more worthy schemes such as the Brighton Station Gateway project whilst funding for more comprehensive pedestrianisation of the Laines was sourced. Furthermore, Councillor Cox added that the Planning Inspectorate had dismissed half of the proposals in the original Old Town scheme meaning the changes were somewhat minimal. However, Councillor Cox agreed that no vehicle should be permitted access to the Laines without a specific purpose for being there.

- 69.9 Councillor Robins stated that he did not agree there were significant instances of rat running in the area as there were not significant benefits to doing so. Furthermore, Councillor Robins stated that he believed the Laines currently worked well as a shared space.
- 69.10 Councillor Davey stated that the proposals had now been through two public consultations and a Public Inquiry and all had come to the conclusion that closing the North Street/Ship Street junction would be beneficial. Councillor Davey stated that the proposals were a start in a series of long-term improvements in the area. Councillor Davey stated that the council had opportunity to apply for significant funding from the Local Economic Partnership via its Strategic Economic Plan and would put forward a series of bids, one of which would be for long-term, sustained improvements to the Old Town area so that it may fulfil its potential. Councillor Davey indicated that a high number of traders in the area were urgently requesting vehicle restrictions and for investment and had, along with the public, made that view clear in the consultation. Councillor Davey welcomed the proposals as a means to make a start on improving the area to the benefit of the city.
- 69.11 Councillor Hawtree welcomed the proposals noting that its historic layout and design was not suited to a large amount of traffic. Councillor Hawtree stated that from experience, he believed many pedestrians assumed that the area was already pedestrianised and concurred with the statement made by Councillor Davey that a start had to be made on long-term improvements.
- 69.12 Councillor Janio stated that he was in generally in favour of the recommendations although was grateful for further clarification as the report had been very unclear. Councillor Janio stated that he usually did not support piecemeal measures but, from his experience as a pedestrian in the Laines area, he believed that something had to be done.
- 69.13 **RESOLVED-**
1. That, the Committee requests the Executive Director Environment, Development & Housing re-advertise the following Order with the modifications described in section 3 of this report:
 - BRIGHTON & HOVE (EAST STREET)(PROHIBITION OF DRIVING) ORDER 20**and that the Committee notes that any representations or objections will be brought back for consideration to a future Committee.
 2. That the Executive Director Environment, Development & Housing reviews the following Order:
 - BRIGHTON & HOVE (PRINCE ALBERT STREET)(PROHIBITION OF DRIVING) ORDER 20**after the implementation of the Ship Street / North Street closure Order (referred to at recommendation 2.3) and brings back any proposals in relation to this Prince Albert Street Order to a future Committee.

3. That, having taken account of all duly made representations and objections, the Committee approves the following Order and authorises the Executive Director Environment, Development & Housing to request the authorisation of the Secretary of State:

- BRIGHTON & HOVE (SHIP STREET)(PROHIBITION OF DRIVING AND ONE-WAY TRAFFIC) ORDER 20**

4. That, having taken account of all duly made representations and objections, the Committee approves the following Order and authorises the Executive Director Environment, Development & Housing to request the authorisation of the Secretary of State:

- BRIGHTON & HOVE (OLD TOWN)(WEIGHT RESTRICTION) ORDER 20**

70. 'THE COMMON ROOM' (ANN STREET/PROVIDENCE PLACE) – RESULTS OF PUBLIC CONSULTATION AND NEXT STAGES

70.1 RESOLVED-

1. That the committee notes the results of the public consultation and resulting revisions to the plans for permanent improvements to Ann Street/Providence Place.
2. That the committee approves the Ann Street/Providence Place Implementation Plans (appendix 2 of this report) as forming the basis for realising a phased series of improvements to the area, commencing later this year.

71. SURREY STREET LOADING BAY TRAFFIC REGULATION ORDER

71.1 **RESOLVED-**That, having taken account of all duly made objections and representations, the Committee approves the following order:

- Brighton & Hove Various Controlled Parking Zones Consolidation Order 2008 Amendment Order No.X 201X

72. VOGUE GYRATORY IMPROVEMENTS

72.1 The Committee considered a report of the Executive Director of Environment, Development & Housing that outlined revised proposals for the improvements to the Vogue Gyratory that formed part of the Lewes Road Improvement Scheme. The Principal Transport Planner stated that design work had been carried out in conjunction with a key stakeholder advisory group comprising of cyclists, bus users, bus companies and car users.

72.2 The Chair expressed his gratitude to the Principal Transport Planner; Robin Reed, who would be moving to the private sector in the near future. The Chair stated that Robin

had made a tremendous impact on transport and infrastructure in the city and his expertise would be greatly missed.

- 72.3 Councillor Mitchell stated her thanks to Robin Reed and wished him well in future pursuits. Councillor Mitchell asked if the northbound left turn up Hollingdean Road was deemed safe when it cut across a cycle lane and regarding access to Bear Road arriving eastward from Hollingdean Road as there was no legible turn.
- 72.4 The Principal Transport Planner explained that the problem of turns going across cycle lanes was an established problem across the city and the country. He explained that the original proposals had separate phased signalling however, modelling had demonstrated that this would cause significant delays for other users. It was therefore intended to use thorough and careful design to minimise the conflict including using bright colours and markings on the road and methods to ensure that cyclists were in clear view of other roads users using the left turn. With regard to access to Bear Road via Hollingdean Road, the Principal Transport Planner stated that there would be a lane marked and clear markings would be used to make it as visible as possible.
- 72.5 Councillor Wealls asked if any discussions had taken place with the businesses currently occupying the Gyratory about possible re-location.
- 72.6 The Principal Transport Planner confirmed that discussions had taken place although it was clear that those businesses did not wish to give up the location, particularly the petrol station. Furthermore, he understood other developers had identified the area meaning there would be competition for the location should it become available.
- 72.7 Councillor Robins stated his concern for cyclists safety regarding the left turn into Hollingdean Road across the cycle lane. Councillor Robins asked if there was any other possible design to eradicate the risk of accidents.
- 72.8 The Principal Transport Planner stated that the speed limit on the road was currently 20mph meaning traffic in the area was relatively slow and reduced the risk of serious injury should an accident occur. Furthermore, the design would focus on high visibility to ensure the conflict was minimised. In addition, the Principal Transport Planner stated that the existing design had potential conflict for cyclists across the Gyratory. The proposals would minimise that area of conflict from around 200-300 metres to the left turn on to Hollingdean Road which was around 30 metres.
- 72.9 Councillor Davey stated that the Vogue Gyratory had been a problem for many, many years adding that he believed the proposals represented the best option in very difficult circumstances, particularly for northward journeys. Councillor Davey stated that the left hook turning was not uncommon but needed to be made as safe as possible. Councillor Davey welcomed the installation of a new bus stop, improved access for pedestrians and for car drivers as the proposals would make the Gyratory easier to navigate. Councillor Davey expressed his gratitude to officers for finding a solution to a decades old problem.
- 72.10 Councillor Cox stated his agreement with Councillor Davey that there were definite positive aspects to the proposals. Councillor Cox added that he had concerns for the left hook turn across the cycle path and the turn into Sainsbury's used by refuse and

delivery vehicles. Councillor Cox supplemented that he had recently cycled through the Gyratory and had found it very unsafe. Councillor Cox recognised that the proposals represented the best option but requested that, if approved, the scheme be monitored very carefully.

- 72.11 Councillor Daniel welcomed the improvements the proposals and the benefit it would bring for pedestrian access. Councillor Daniel asked if any consideration had been given to merging the cycle path at the left turn to Hollingdean Road with the pedestrian crossing located at the turn.
- 72.12 The Principal Transport Planner explained that such measures were considered but were not taken forward due to the risk that the type of cyclist using the lane would disregard a longer route and join the carriageway causing safety concerns for car users, buses and themselves.

72.13 RESOLVED-

1. That the Committee notes the results of the 2012 public consultation reported at the Transport Committee meeting on 2nd October 2012 and approves the revised improvements to the Vogue Gyratory.
2. That Committee authorises officers to proceed with advertising the formal Traffic Regulation Order (TRO) for changes to the Vogue Gyratory. Should any objections be raised then they will be heard at a future meeting of the Environment, Transport and Sustainability Committee where final approval would need to be given to proceed with implementation.

73. STANMER PARK – PERMISSION TO CONSULT ON MASTER PLAN IN PREPARATION FOR HERITAGE LOTTERY FUND GRANT APPLICATION

- 73.1 The Committee considered a report of the Executive Director of Environment, Development & Housing that summarised the progress made on the Master Plan for restoration and improvement works of Stanmer Park to date, set out the proposed governance arrangements to oversee delivery of the Plan and sought permission to consult on the Plan.
- 73.2 Councillor Sykes asked if the SDNPA could be offered temporary accommodation as should the bid be successful, the time-scale for the start of works would not be until 2017.
- 73.3 The Chair added that the current accommodation was in a very poor condition and he would be highly disappointed if the SDNPA were forced to move to different accommodation for that reason.
- 73.4 The Head of Strategy & Projects clarified that there would be further discussions about possible opportunities for interim arrangements.
- 73.5 Councillor Davey stated that Stanmer Park was unique and residents were fortunate to have such a location close to the city. Councillor Davey added that although there were

superb transport links to the area, it required investment and he hoped the bid would be successful.

73.6 Councillor Mitchell stated that she fully supported the proposals and expressed her hope that the vision for Stanmer Park could be realised.

73.7 Councillor Janio stated his support for the proposals and asked if there was a timetable for further reports on the issue to be submitted to the Committee as work progressed.

73.8 The Head of Strategy & Projects clarified that there would be a report submitted to the Committee subsequent to the consultation and before submission of the HLF grant application.

73.9 Councillor Wealls asked if the current rental income could be used to borrow capital for re-development.

73.10 The Head of Strategy & Projects clarified that although opportunities to generate income from the land were been examined for the future, the current rental income of £105,000 was not sufficient to use for borrowing or investment.

73.11 **RESOLVED-**

1. That Committee notes the progress made to date on the Stanmer project
2. That Committee grants permission to consult on a Master Plan for Stanmer Park
3. That Committee approves the proposed governance arrangements for the management of the project through to submission of the funding bid.

74. EAST BRIGHTON PARK PROPOSALS FOR A CONTROLLED PARKING SCHEME

74.1 **RESOLVED-** That the Committee authorises the Executive Director Environment, Development & Housing to consult on proposals to implement a controlled parking scheme in East Brighton Park.

75. INTRODUCTION OF LICENSE SCHEME WITH CHARGES FOR FITNESS TRAINERS USING PUBLIC GREEN SPACES

75.1 **RESOLVED-** That the Committee –

1. Agrees the introduction of a licence scheme, effective from 1st April 2014, for commercial fitness trainers that use public green spaces owned or managed by the council, as specified in paragraph 3.5 and in accordance with the main conditions set out in Appendix 1.

2. Authorises the Executive Director Environment, Development & Housing to implement the scheme and, as and when required, revise the scheme to ensure it continues to operate effectively, efficiently and lawfully.
3. Approves the licence charges for the scheme, as set out in Appendix 2.
4. Instructs the Executive Director Environment, Development & Housing to review the scheme licence charges annually and to submit any proposal for amendment to the Committee for approval.

76. BRIGHTON MARINA TO RIVER ADUR FLOOD AND COASTAL EROSION RISK MANAGEMENT STRATEGY

76.1 RESOLVED-

3. That the Committee notes the results of the recent public consultation on a long list of options for the Brighton Marina to River Adur flood and coastal erosion risk management strategy.
4. That the Committee agrees that a further round of public consultation is carried out on the proposed, preferred options for the Brighton Marina to River Adur flood and coastal erosion risk management strategy, set out in Appendix 2, and the results reported back to a future committee meeting in early 2014 for consideration and agreement.

77. ITEMS REFERRED FOR FULL COUNCIL

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

The meeting concluded at 7.00pm

Signed

Chair

Dated this

day of

Notes of City Sustainability Partnership Meeting – 22 January 2014

Committee Room 1, Brighton Town Hall, Bartholomew Square, Brighton, BN1 1JA

Present:

Public Services:

Becca Melhuish, University of Brighton
Mark Brunet, Blatchington Mill School
Susie Vernon, Sussex Community NHS Trust

Community and Voluntary Sector:

Cat Fletcher, Community Works (CF)
Chris Todd, Community Works. Chair (CT)
Robert Stephenson, Community Works
Roger Carter, Brighton & Hove Wildlife Forum (RC)
Vic Borrill, Food Partnership, Vice Chair (VB)

Business Sector:

No attendees.

Brighton & Hove City Council:

Councillor Ollie Sykes (OS)
Councillor Pete West (PW)
Councillor Tony Janio (TJ)
Dean Austyn, Performance Analyst (DA)
Jeremy Dresner, Carbon Management Project Officer
Sarah Jones, administrator and note taker (SJ)
Thurstan Crockett, partnership manager (TC)

Observers

Conor Moloney, BioRegional
Henry Unwin, BioRegional
Siobhan Wilson, Fairtrade Steering Group (SW)

Presenter

Rachel Espinosa, Re-Consult (RE)

1. Introductions and Apologies

- 1.1 Chris Todd welcomed the new members to the Partnership.
- 1.2 Apologies were received from Zoe Osmond, University of Brighton; Nick Hibberd and Geoff Raw, Brighton & Hove City Council; Damian Tow, Sustainable Energy Working Group; and Will Clark, Sussex Community NHS Trust.

2 Minutes and Actions from last meeting

- 2.1 The Minutes of the last meeting on 21 November 2013 were approved.

- 2.2 The Chair went through updates on the following actions from the last meeting:
- 3.4 NH to advise LEP members of CSP's concern at the decision not to include CVSF representation in the consultation with area partners. This had been done.
 - 3.10 TC to draft CSP response to LEP consultation. PB, JC, CT, OS, and HW to feed into the draft response to TC; and CT to submit it. This had been done.
 - 5.2 ZO to ask University colleagues for an update on the University of Brighton's Thermal Energy storage project. This had been done, though the details were still not available.
 - 6.2.4 **Action: DA and TC to present Sustainability Action Plan projects' performance against KPIs at a following meeting.**
This was carried forward to the next meeting.

3 Election of Partnership Chair and Vice Chairs

- 3.1 TC advised members that he had received two nominations in the election. One was for Chris Todd as Chair and the other was for Vic Borrill as Vice Chair. Both were duly re-elected.
- 3.2 TC advised members that there was still one Vice Chair post vacant. He asked for nominations from all sectors. CF nominated herself and she was duly elected with members' agreement.
- 3.4 VC and CT were thanked for their commitment and CF for stepping forward.

4 Anaerobic digestion project feasibility study – presentation

- 4.1 RE presented to members on the above. The presentation was to be made available on the CSP page of the council website.
- 4.2 The study had calculated that approximately 30,000 tonnes of food waste from the business and public sector were produced every year. This figure was projected to increase to 52,000 tonnes p.a. by 2033.
- 4.3 The next step of the project was to produce a fully costed business plan. There was a suggestion that maybe a smaller pilot might be a good way of testing the market and business model, before going for a large and expensive set-up.
- 4.4 RE would check the statistical data backing up the study's modelling of growth at 0.5% p.a. **Action: SJ to ask RE to update her presentation if necessary for the CSP webpage.**

5 Waste House update

- 5.1 CF updated members on the history and progress of the Waste House being constructed at Grand Parade in Brighton. It was very well received and Cat was congratulated on her efforts, which she had often carried out for little or no reward.

6 Sussex Energy Savers Partnership (SESP) Green Deal update

- 6.1 TC spoke to members about the SESP Green Deal update report submitted by Miles Davidson of Brighton & Hove City Council.
- 6.2 He drew members' attention to points 3.1 to 4.2: the council is an affiliate partner and will provide homes; local jobs will be provided via Carillion; programme will focus on public and commercial buildings at first. The Green Deal offer depends on government policy changes.

7 Updates

7.1 Brighton & Hove Wildlife Forum

- 7.1.1 B&HWF had provided minutes of their latest meeting on 03.12.13.
- 7.1.2 Dave Larkin was invited to attend B&HWF meetings on behalf of the council starting 2014.
- 7.1.3 The forum wanted to see mapping of planned food growing on uncultivated sites. VB advised that landowners decided what would be grown and supplied.
- 7.1.4 RC expressed the Forum's concern about the increase in dog mess in the city's parks which was perceived to be a result of professional dog walkers. PW advised that dog walking agencies signed up to a voluntary code of conduct. It was agreed that evidence collection to present to council would be valuable; RC would take this suggestion back to BHWF.

7.2 City Plan – Planning Inspector's initial conclusions

- 7.2.1 Planning Inspector had ruled that because the number of proposed houses in the City Plan fell well short of the 20,000 homes that were needed in the city, more effort needed to be made to find more. The only way of meeting this shortfall would be to significantly increase the density of existing housing estates and / or develop the urban fringe.. Concern was expressed about the impact of this and re-convening the partnership's Sustainable Cities Working Group to look into the alternatives was suggested. It was agreed that this would be a good idea.

Action: CT/TC to liaise with City Planning to re-convene a meeting of the SCWG to look at opportunities within and

around the city and the impact this would have. There would also be a look at how the housing need figures are calculated. Partners will be invited to engage in this process.

7.3 Fair Trade Steering Group

- 7.3.1 SW advised that Fair Trade Steering Group's recent work had included the Christmas Fairtrade Trail in November 2013, promoting Fair Trade products on sale across a range of outlets in Brighton & Hove.
- 7.3.2 SW advised members about a forthcoming debate on The Fashion Revolution and Rana Plaza – the eight storey building in Bangladesh which collapsed in April 2013, killing more than 1,100 workers and injuring 2,000 more. The panel would discuss how the disaster had happened and how to prevent similar disasters in the future.
- 7.3.3 Fair Trade Fortnight was planned for 24 February – 9 March 2014. There would be an exhibition at Jubilee Library looking at how Brighton & Hove is engaging with Fair Trade.
- 7.3.4 SW expressed the Steering Group's concern that locally, non-food Fair Trade businesses seem to be relatively unknown and asked for suggestions on how to promote them. It was suggested they use positive mainstream media and engage with those who are not environmentally conscious.

7.4 Sussex Energy Working Group

- 7.4.1 TC reported on behalf of DT.
- 7.4.2 Brighton Energy Co-op has concluded research and produced a financial model to support a proposed community owned anaerobic digester based in a shipping container. The capital cost was about £250,000.

7.5 Sustainable Community Strategy – Summary Introduction

- 7.5.1 The Summary had been circulated before the meeting for members' information.
- 7.5.2 CT advised that the Partnership had not been involved with the drafting of the summary of the SCS before it was agreed at the last LSP meeting. He emphasised that One Planet Living principles should be embedded in the strategy. **Action: CT asked members to provide any feedback to him, by the end of the evening.**

8 **Any Other Business**

- 8.1 Biosphere update: CT advised members of the timeline until decision: UNESCO will request any more information they require by the end of March; the decision on whether the area would be granted Biosphere status would be announced in Sweden on the 11th or 12th June 2014.
- 8.2 TJ advised members that he had been made the Woodland Trust's Tree Champion for the city. **Action: members with ideas for tree planting sites in the city to contact TJ.**
- 8.3 VB advised members that Spades & Spoonfuls was now available. This was a publication setting out the Food Partnership's progress over the past 18 months.

Next meeting: 6th March 2014, 5pm-7pm in Committee Room 1, Brighton Town Hall

Subject: Petitions
Date of Meeting: 4 March 2014
Report of: Monitoring Officer
Contact Officer: Name: John Peel Tel: 29-1058
E-mail: john.peel@brighton-hove.gov.uk
Wards Affected: Various

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive any petitions submitted directly to Democratic Services or any e-Petition submitted via the council's website.

2. RECOMMENDATIONS:

- 2.2 That the Committee responds to the petition either by noting it or writing to the petition organiser setting out the Council's views, or where it is considered more appropriate, calls for an officer report on the matter which may give consideration to a range of options, including the following:

- § taking the action requested in the petition
- § considering the petition at a council meeting
- § holding an inquiry into the matter
- § undertaking research into the matter
- § holding a public meeting
- § holding a consultation
- § holding a meeting with petitioners
- § referring the petition for consideration by the council's Overview and Scrutiny Committee
- § calling a referendum

3. PETITIONS

3. (i) 20mph limit in the Hollingbury and Braybon area- Hugh Woodhouse

To receive the following petition signed by 156 people:

We the undersigned express our support for 20mph limits in the road in which we live and petition the council to reconsider its decision to eject our roads from the phase 2 of 20mph proposals. 1 in 6 people in the UK now have 20mph limits in the street where they live. Slower speeds are well proven to reduce collisions and casualties and make streets safer for all road users, especially for children, the elderly and disabled people

WRITTEN QUESTIONS**(i) Dyke Road Park proposals- Mavis Aldridge**

“As an elderly person with two replacement hip operations behind me, I realise that a fall could leave me in a wheelchair. I am therefore very concerned that it is proposed to allow cyclists to share the pavement adjacent to Dyke Road Park. The park attracts the elderly and the young, two groups that are very vulnerable to accidents. Bikes no longer have bells and it is impossible to hear them about to overtake you. There is space here for a separate pavement and cycle lane so why was this option rejected in favour of the least safe option?”

(ii) Dyke Road proposals- Jason Brooks

“I am one of many parents concerned by the proposed removal of safety guard railings in front of Windlesham School on Dyke Road. The path from the school runs downhill and the removal of barriers means children could potentially roll on a bicycle or scooter, unimpeded into traffic, or be jostled into the road on foot. The proposal that this busy, relatively narrow area of pavement will also be shared with cyclists arriving at right angles seems to further necessitate the need for a safety barrier. Please can you explain fully what seems a dangerous step”

DEPUTATIONS FROM MEMBERS OF THE PUBLIC

A period of not more than fifteen minutes shall be allowed at each ordinary meeting of the Council for the hearing of deputations from members of the public. Each deputation may be heard for a maximum of five minutes.

Deputations received:

(i) Deputation: Dyke Road cycling and pedestrian improvements (Friends of Dyke Road Park)

I am making this statement on behalf of the Friends of Dyke Road Park. It represents the views expressed by the overwhelming majority of the 15 people who have attended our meetings over the past four months, and those who have spoken to me at other times or have contacted me by email in response to this statement being circulated.

We are grateful to Abby Hone and Martin Heath for consulting with us on the project and for explaining to us the concept behind it.

We accept that it is important to provide improved facilities for cyclists, and recognise that, due to physical constraints, the pavement on the park side of the road will have to be a shared cyclist/pedestrian space. We will watch with interest to see how it works.

While we recognise the need for improved facilities for cyclists, we do *not* consider a change in the crossing arrangements on Dyke Road from light-controlled to zebra crossings to be an 'improvement' for pedestrians.

Nor do we feel that the removal of safety barriers at the top of Crocodile Walk or outside Windlesham School would do anything to 'improve' the safety of the hundreds of children and young people who emerge each day on to a narrow pavement beside a busy main road. We believe that the removal of the barriers would not only be potentially dangerous to the children, but would cause unnecessary stress to parents and passing motorists.

While such schemes may be appropriate for residential streets and other 20-mph zones, they do not seem to us sensible on a poorly lit, 30-mph road, used by HGVs and buses.

We feel that the two light-controlled crossings give pedestrians an unambiguous indication as to when it may be safe to cross (with appropriate checks). For the elderly, or those with visual impairment, they may be the *only* way they can cross the road.

For drivers of cars, buses and HGVs, such crossings not only provide an unambiguous message, but sufficient *time* to take the necessary action.

As either pedestrians or motorists we have no objection to waiting at the lights for our turn to proceed.

We therefore urge you to maintain light-controlled crossings at both the current locations. They have served the area well for the last 20 years, and we see no reason to change them.

Jannet King (Lead Spokesperson)

(ii) Deputation: Safety Concerns - Dyke Road pedestrian and cycle facilities proposals

We wish to urgently draw the ETS Committee's attention to serious safety issues within these plans. We believe that 'new thinking' on safety management has been applied generically to the scheme, without taking into account the specific environment – that of a major artery into the city (with the associated heavy traffic flows), but also a popular thoroughfare for large volumes of pedestrians, especially young pre-school and school children (of all ages). This is due to there being numerous educational establishments and attractions (such as Dyke Road Park) in the area. The area also has very good road safety management already in place, which is long established and well used. To make changes to this seems unnecessary at best, and reckless at worst. The proposals have also failed to reach many interested parties in the area (due to flaws in the consultation process), and awareness of the fine detail of the project is very low (not helped by the ever-changing and difficult to interpret plans). We have found from talking to local users that the headline figures provided by the informal consultation do not reflect the views of the majority, many of which are concerned about the following key issues:

Removal of safety guard rails outside of Windlesham Primary School & Nursery (not marked on any of the consultation/TRO diagrams – 190 Dyke Rd – photos 3&4) and at the top of Crocodile Walk (see photos 5&6). Both sets of railings prevent young children, who are exiting vertically to the normal pavement flow, from accidentally running/falling into the road. This is particularly evident when there are large numbers of children on the pavement at peak school run times. The Croc Walk railing also guides pedestrians to use the crossing rather than take an 'unsafe' line of desire' to cross at the busy junction of Porthall Road. There can be no doubt these have saved numerous accidents/lives of young children, over many years.

Changing both pelican (traffic light) crossings to zebras. Pelican light crossings are already in place and have served the community well. They are suitable for an area with high levels of traffic and pedestrians crossing the road at peak times, ensuring that both safety and traffic flow are given priority (see accident & collision figures and photos 1&2). The crossings work and are simple for all users to understand, particularly young children, vulnerable adults and the partially sighted (the area is also poorly lit due to tree coverage).

Creating a shared pavement and cycle lane by the proposed zebra crossings on the eastern side of the road. This is a new proposal that has just been added (and not consulted on at any stage). One of these shared areas will be directly outside the entrance of Windlesham School – children will exit around a blind corner straight into a cycle lane – this is extremely dangerous and devoid of common sense.

The school's location continues to not be marked on these plans.

Creating a shared pavement and cycle lane by Dyke Road Park. As well as the usual risks associated with a shared pavement, there are also a number of trees that will be in the centre of the lane acting as obstacles for lines of vision and flow of movement. There is parking by the side of the lane so cars will be opening doors directly onto this, with children disembarking. Young children and the elderly find such ambiguous arrangements threatening and confusing.

Please consider the safety element of these plans carefully and give it the priority it deserves – reject the proposals to remove the guard rails and change the crossings from pelicans to zebras and insist on separate cycle lanes on both sides of the road (this can be achieved and it should be noted that it is generally agreed that shared unsegregated lanes are not appropriate for busy pedestrian pavements and are seen as a 'last resort')

Ali Heal (Lead Spokesperson)
Kathryn Nott

Supplementary Information

Pelican crossing and guard railings functioning as intended outside Windlesham Primary School (190 Dyke Road)

Photo 1



Photo 2



Photo 3 – Windlesham school entrance, guard railings and pelican crossing – this is where a shared cycle lane/pavement is proposed

Photo 4 – view out of Windlesham school towards Dyke Road – railings in front



Photo 5 – exit out of Croc Walk onto Dyke Rd



Photo 6 – view from Croc Walk towards Dyke Rd – safety railings protecting from



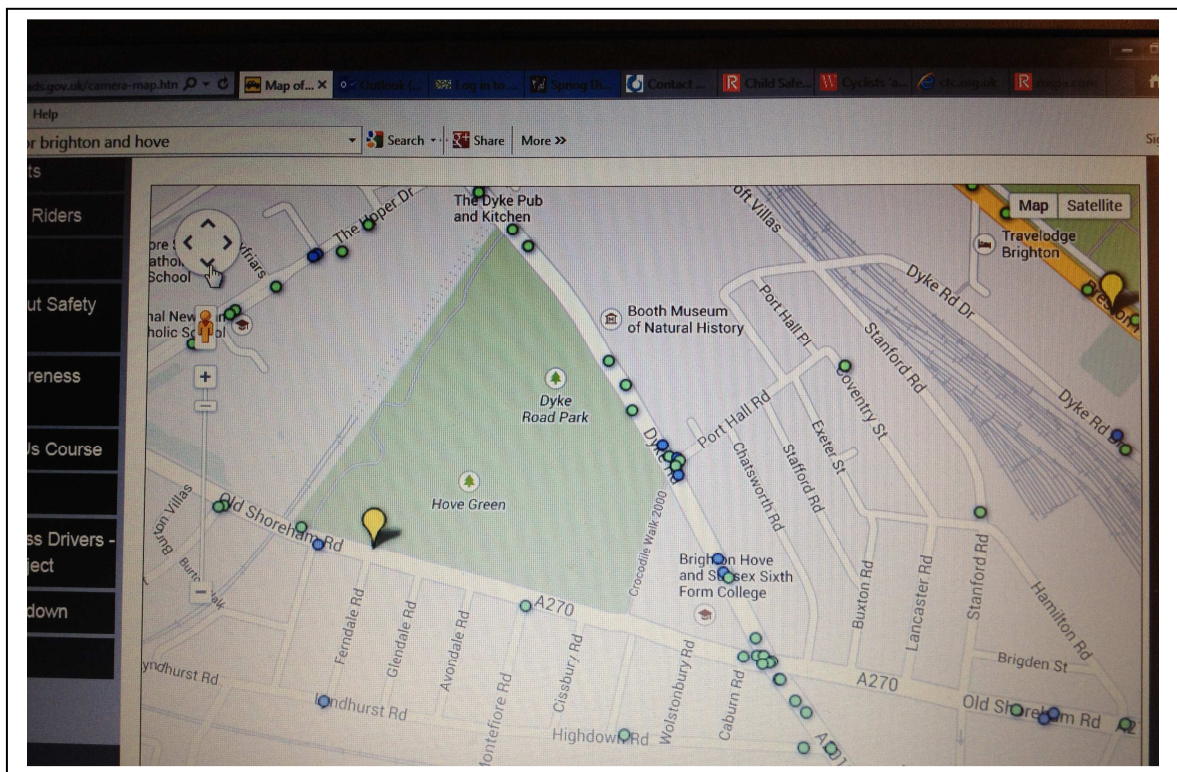
Proposed shared cycle lane/pedestrian pavement on west side of road (by Dyke Road Park)
Photo 7



As can be seen in the photos there is plenty of room alongside the pavement on the grass verge where a separate cycle lane could be introduced. Currently the plans shift the pavement over slightly (@ 0.5m) so that the large line of trees in the photos are positioned in the centre of this 'shared pavement', acting as an obstruction to lines of sight and movement for pedestrians and cyclists.

Sussex Safer Roads Partnership Accident and Collision data for period Oct 2008 – Sept 2013

Key to dots – Red – fatal, Blue – serious, Green – slight



The area is not an accident black spot and has a very good safety record for such a busy main road – the safety management in the area works.

(iii) Deputation: Creation of new Residents Parking Zone E

I, and my neighbours listed below, are submitting this deputation in support of the Council's proposals contained in Orders TRO-1a-2014 and TRO-1b-2014 due to be considered by the Environment, Sustainability and Transport Committee on 4 March 2014.

In 2009 Controlled Parking Zone A was introduced around Preston Park Station and in 2011 it was extended to Tivoli Crescent. This has resulted in parking spaces in the roads to the west of the station (ie Tivoli Crescent North, Tivoli Road, Maldon Road and Matlock Road) becoming increasingly monopolised by commuter cars, long term ('Gatwick') parking and cars 'dumped' for long periods by their owners. Local residents have had an ever more impossible task finding parking near their home. Moreover increased congestion has resulted in anti-social and dangerous parking across driveways, on corners and on grass verges. This has particularly affected the east side of Dyke Road between Tivoli Crescent North and The Drove. Please see examples of this in the photo dossier attached.

Something obviously needed to be done and the Council's consultation last autumn on a proposed extension of Zone A to the above roads resulted not just in a 50/50 split in opinion but also generated a great deal of debate and prompted many individual views and suggestions being sent to the Council. We therefore believe that it was entirely proper for the latter to revise their original proposal in the light of the suggestions and comments they received and make appropriate changes, the most significant of which is the creation of a separate Controlled Parking Zone E for the above roads with relaxed controls at weekends. A review of how the new Zone might effect nearby roads Hazeldene Meads and The Beeches was also included in the revised proposals following residents' representations.

We believe the proposals in Orders TRO-1a-2014 and TRO-1b-2014 will :

- Greatly improve parking for residents in the roads to be included in the new Zone E
- Significantly increase safety in the area, not least in respect of dangerous parking on Dyke Road
- Bring a calmer and more pleasant environment to the area, with fewer vehicles generally.
- Hopefully encourage commuters etc to make greater use of the currently very *under-used* 'pay-and-display' parking close to Preston Park station, especially if tariffs etc there are revised to increase usage. Introducing Zone E need not therefore be just '*shifting the problem to another area*'.
- Provide good short term parking for visitors to the area (albeit pay-and-display on weekdays) thus helping residents and local businesses alike.
- Secure local parking in our area for the future irrespective of what parking restrictions/ reductions are introduced in nearby locations such as west of Dyke Road and BHASVIC (Planning Application No BH2013/03816).

During the past 6 months a few local residents have been calling for greater consultation. With the Council's exercise last September, three hearings before the EST Committee in the past 3 and a half years, the Council's mailshot of 6 January 2014, many and varied local leaflets, meetings & discussions, not to mention Ward Councillors' soundings and surgeries, correspondence in The Argus and the publicised Council Orders, we believe that quite enough consultation and debate has

gone on here. Local residents have taken full opportunity to express their views and as a result the Council has put forward a very balanced and reasonable proposal. It's now time to get on and implement it.

Peter Meekings (Lead Spokesperson)

Helen Jones

Bob Wall

Dan Taylor

Martine Danby

Lorna Redhead

Supplementary Information
Picture showing parking issues in proposed new Zone E



Tivoli Crescent North – bumper to bumper



Maldon Road : Car blocking disabled bay (Red car only belongs to home owner)



Dyke Road: Vans parked both sides of driveway obscuring vision of resident pulling out



Dyke Road : View south pulling out of drive



Dyke Road : View north pulling out of drive



Tivoli Crescent North : Non-residential vans

- (iv) **Deputation** requesting that Preston Drive, Stanford Avenue and Surrenden Road are included in the 20mph Speed Limit programme in Brighton and Hove (Phase 2)

As a resident of the Preston / Fiveways area of Brighton, I am asking Brighton and Hove City Council to reconsider the decision not to reduce the speed limit on Preston Drive, Stanford Avenue and Surrenden Road to 20mph. More than 742 people signed my petition in support of this aim, most of them with a BN1 postcode. I presented the petition documents to Council on 30/1/14.

These streets were excluded from the 20 mph speed limit programme by councillors' amendments at the Environment, Transport & Sustainability Committee on 11/12/13. We strongly support the inclusion of all the roads currently identified for 20mph speed limits in the Preston area in TRO-3d-2014, but we strongly object to the exclusion of Preston Drive, Stanford Avenue and Surrenden Road (along its whole length) in TRO-3d-2014 and TRO-3e-2014.

I urge this Committee to take immediate steps to ensure that these residential streets are again included in the 20 mph speed limits programme.

The following points support our case:

- There are many schools and routes to school in this residential area; also parks and nurseries.
- There is enormous local strength of feeling that people, and specifically children are at risk from motor vehicles going too fast.
- Research evidence is overwhelmingly in favour of traffic speed reduction as a means of reducing road danger, encouraging walking and cycling and improving street ambience.
- Preston Drive and Stanford Avenue are not key bus routes as stated in one amendment.
- Voting in the consultation on the above roads was extremely marginal.
- The negative media campaign during the 20 mph consultation may have influenced respondents to vote against 20 mph. Adjudication by the Advertising Standards Authority(ASA) on two full page adverts published during the consultation was that they breached the advertising code on misleading advertising and substantiation. (The rulings are on the ASA's website at: http://www.asa.org.uk/Rulings/Adjudications/2014/2/Unchain-the-Brighton-Motorist/SHP_ADJ_243394.aspx and http://www.asa.org.uk/Rulings/Adjudications/2014/1/GMB-Brighton-and-Hove-Taxi-Section/SHP_ADJ_245585.aspx)
- Residents of Surrenden Road voted in favour of 20mph.
- There is an accident cluster at the junction of Surrenden Road and Preston Drive
- Excluding these streets from the 20mph scheme will cause confusion, inconsistency and unnecessary cost.
- If these streets aren't included, there will be the anomaly of Ditchling Road having a 20 mph limit up to the Fiveways junction, while adjacent streets Stanford Avenue and Preston Drive remain at 30 mph.
- [The exclusion of these streets was not in line with Brighton and Hove City Council officers' recommendations.](#)
- Increases to motor vehicle journey times will often be negligible or non-existent when time stopped at junctions and crossings is taken into account.
- The BHCC Scrutiny Panel on 20mph in 2010 recommended 20mph in all residential streets of Brighton & Hove.

- All political parties on BHCC have stated their support for lower speeds in residential streets.

Becky Reynolds (spokesperson)

Subject: Items referred from 31 January 2014 Full Council meeting- Petitions
Date: 4 March 2014
Report of: Monitoring Officer
Contact Officer: Name: John Peel Tel: 29-1058
E-mail: john.peel@brighton-hove.gov.uk
Wards Affected: Various

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive any petitions referred from the Full Council meeting of 31 January 2014.

2. RECOMMENDATIONS:

- 2.2 That the Committee responds to the petition either by noting it or writing to the petition organiser setting out the Council's views, or where it is considered more appropriate, calls for an officer report on the matter which may give consideration to a range of options, including the following:

- § taking the action requested in the petition
- § considering the petition at a council meeting
- § holding an inquiry into the matter
- § undertaking research into the matter
- § holding a public meeting
- § holding a consultation
- § holding a meeting with petitioners
- § referring the petition for consideration by the council's Overview and Scrutiny Committee
- § calling a referendum

3. PETITIONS

3. (i) 20mph limit on Preston Drove, Stanford Avenue and Surrenden Road-Becky Reynolds

To receive the following petition referred from the meeting of Full Council on 31 January 2014 and signed by 742 people:

"Please reconsider the decision not to reduce the speed limit on Preston Drove, Stanford Avenue and Surrenden Road to 20mph"

3. (ii) Dyke road pedestrian and cycle lane plans

To receive the following petition referred from the meeting of Full Council on 31 January 2014 and signed by 184 people:

“We the undersigned petition the council to urgently review the plans for Dyke Road pedestrian and cycle facilities in light of the danger these pose for pedestrians and young school children in particular (there are 3 primary and 2 secondary schools in the local area). We completely oppose the removal of safety railings outside the primary school entrance and Crocodile Walk and the changing of pelican crossings and zebra crossings. We believe the initial consultation, completed in November 2013, missed significant interested parties and hence received a very low response rate that does not reflect all local users views and issues”

3. (iii) Postpone enforcement on Elm Grove until substantially more safe and legal parking is created- Tanya Richardson

To receive the following petition referred from the meeting of Full Council on 31 January 2014 and signed by 1443 people:

“We the undersigned petition the council to postpone any enforcement of yellow lines on Elm Grove until substantially more safe and legal parking is created”

Dear Councillor West

Speed limits on Stanford Ave, Preston Drove and Surrenden Rd.

We are writing to ask that Environment and Transport Committee reconsider its decision to remove Stanford Avenue, Preston Drove and Surrenden Rd from the extended 20mph speed limit zone.

The local community in Preston Park Ward has shown strong support for a 20mph speed limit on these roads via the recent petition on this matter presented to Full Council.

All three roads see a very high level of use by pedestrians, especially schoolchildren and families accessing Preston and Blakers Parks and several local schools. Preston Park Ward Councillors receive regular complaints about current traffic speeds on these roads and the danger to pedestrians and cyclists. In three years not one local resident has expressed support for keeping speed limits at 30mph on these 3 roads or on side roads. We were therefore surprised by the decision of Committee to exclude some roads from the 20mph zone, particularly those that are regularly cited by Preston Park area residents as prone to speeding traffic.

Professional road safety Officers and campaigners for safer streets support the move towards 20mph in residential areas. There is compelling evidence to show that fatalities and injuries are reduced, walking and cycling become more attractive and the street environment feels more pleasant for all users. All three roads are not only routes for vehicles but more importantly they are places where people live and have a sense of community.

As Preston Park Ward Councillors we strongly support the desire of our local community for the introduction of 20mph speed limits to all roads designated in the original proposal presented to Committee.

Please reconsider your decision.

Cllrs Mike Jones, Leo Littman, Amy Kennedy

Preston Park Ward

Brighton and Hove City Council

Councillor West
Chair of the Environment, Sustainability
& Transport Committee
Kings House
Grand Avenue
Hove, BN3 2LS

Councillor Sue Shanks
Chair of Children & Young People Committee
Brighton & Hove City Council
Kings House
Grand Avenue
Hove, BN3 2LS

17 February 2014

Dear Councillor West

Re: Review of 20mph Speed Limit Zone

As Chair of the Environment, Transport & Sustainability Committee, I would like you to accept this letter for consideration by the Committee at its meeting on the 4th March 2014.

I would like the committee to reconsider its decision to remove Stanford Avenue, Preston Drove and Surrenden Rd from the extended 20mph speed limit zone.

In my capacity as Chair of the Children and Young Peoples Committee I am concerned that young people have safe routes to school. We want to encourage young people to walk and cycle to school. Surrenden road is crossed by children and young people going to Varndean College, Dorothy Stringer and Varndean secondary schools and Balfour Primary. There is no safe crossing point.

I have been contacted by many residents of Withdean ward, which contains Surrenden Road, concerned particularly about this road and the number of children who use it going to school. As the ward councillor I recently asked peoples opinion on Surrenden Road. On the day I was knocking on doors cars were speeding past me. The existing speed limit of 30 mph is often broken and I feel a decisive move needs to be made to limit speed, before someone is injured crossing there.

The local community has shown strong support for a 20mph speed limit on these roads via the recent petition on this matter presented to Full Council.

Professional road safety Officers and campaigners for safer streets support the move towards 20mph in residential areas. There is compelling evidence to show that fatalities and injuries are reduced, walking and cycling become more attractive and the street environment feels more pleasant for all users. All three roads are not only routes for cars but more importantly they are places where people live and have a sense of community. Young people also use Preston drove for example going to the tennis club there or the cycling track.

I strongly support the desire of the local community for the introduction of 20mph speed limits to all roads designated in the original proposal presented to Committee.

Please reconsider your decision.



Tel: (01273) 291410
Email: sue.shanks@brighton-hove.gcsx.gov.uk

Chair of Children & Young People Committee
Green Party Councillor for Withdean Ward

Subject:	Adoption of Brighton & Hove City Council Allotment Strategy		
Date of Meeting:	4 March 2014		
Report of:	Executive Director of Environment, Development & Housing		
Contact Officer:	Name:	Jan Jonker	Tel: 29-4722
	Email:	jan.jonker@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 There are over 3,100 allotments in Brighton & Hove with over 6,000 residents regularly participating in allotment gardening. Allotments play an important role in food growing but also have significant social, health and environmental benefits.
- 1.2 An Allotment Strategy and Action Plan has been produced in partnership with the Allotment Federation and facilitated by the Food Partnership. The 10 year strategy sets out the priorities for the future to maintain and further improve the service and maximise the benefits for the community generated by allotments within the constraints of the current budget situation. The Action Plan will be a live document delivered with the council's partners and reviewed and updated on a regular basis.

2. RECOMMENDATIONS:

- 2.1 That the Committee formally adopts the draft Allotment Strategy

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 In Brighton & Hove there are over 3,100 allotments across 37 sites with more than 6,000 people regularly taking part in allotment gardening in the city.
- 3.2 Allotments play an important role in sustainable food production and are an important part of the city's green network. Plot holders report a wide range of benefits from having allotment aside from food growing which include being more environmentally aware, providing opportunities to socialise, a means of being physically active and improving physical health, mental health and stress relief.
- 3.3 The Allotment Strategy has been produced in partnership with the Allotment Federation with the Food Partnership contracted to lead on the strategy process. It has been informed by a thorough consultation process which included surveys

of plot holders and people on the waiting list for an allotment. In total over 1,800 responses were received to these surveys. The strategy was overseen by a steering group consisting of council officers, staff from Public Health, members of the Allotment Federation and the Food Partnership. A number of working groups were established to look at specific issues.

- 3.4 Two detailed surveys took place of plot holders and people on the waiting list which gathered over 1,800 responses and generated robust information on which to base the strategy. A focus group was held with 12 'Site Reps' and a consultation event was held which was attended by more than 50 people.
- 3.5 A copy of the proposed strategy is attached as Appendix 1. It covers three main areas land, resources and governance. The objectives of the strategy are set out below:
 - Provide an economic way for people to produce good quantities of high quality, locally grown food
 - Increase the number of people participating in food growing on allotments and ensure that all sections of the community can enjoy the benefits / participate.
 - Ensure availability of good quality, accessible land for allotments
 - Work towards a self-sustaining and efficiently run service that keeps down costs for both tenants and the Council.
 - Encourage on site participation to ensure the protection and promotion of allotments for-food growing.
 - Support the very best practice in growing, so that allotments are a source of education and inspiration for the whole city in good food and healthy living.
 - Ensure that the allotment sites, alongside the main role of food growing, play a role in conserving the biodiversity of the city contributing to a healthy living environment
 - To take a co-operative and participative approach to running the service and developing allotment policies and practices
 - To ensure that learning and evidence gathered from the development of this strategy is shared within the city and used to inform other policy work.
- 3.6 The development of the strategy identified priorities which are addressed through policies and the Action Plan. Full details are set out in the draft document with some key areas highlighted in the table below.
- 3.7 It is recognised that the resources in the Allotment Service are limited and that the strategy should aim to improve efficiency and minimise costs. The Action Plan will be delivered from within existing resources of the service and through

partnership working with the Allotment Federation, the Food Partnership and other partners.

3.8

Key Issues	Recommendations/ Actions
<p>Management of Waiting List</p> <p>The survey of people on the waiting list showed it was artificially inflated by people applying for an allotment and then moving away or losing interest.</p> <p>As part of the survey people were asked to reconfirm whether they still wanted a plot and this resulted in the waiting list declining from approximately 2200 to 1000 meaning there is less pressure on allotments than initially thought. People wait 2 to 4 years for a plot depending on which site they choose.</p> <p>Demand has varied over time, and may increase again eg when people realise they can get a plot more quickly than anticipated.</p>	<p>Management of the waiting list needs to be improved to ensure as far as possible it reflects real demand.</p> <p>Opportunities to engage with people waiting (eg providing information on alternative sites with shorter lists, providing information on co working, training and site open days) should be maximised. Better information will be provided to help people make informed choices about plot size to minimise people taking on a large plot if they are unable to cultivate it properly.</p> <p>Waiting lists for individual sites will be published so people can make informed choices about which location they apply for (they may choose a less popular location if the waiting list is shorter).</p> <p>Use of ICT will be reviewed to help deliver these improvements.</p>
<p>Choice of Plot Size</p> <p>In recent years the council has split all full plots in half when they have become available to increase capacity and reduce the waiting list. This approach was contested by the Allotment Federation. The survey has shown that the majority of people favour a half plot with only one in five preferring a full plot. The current % of full and half plots closely matches the results of the survey and the reduced waiting list means there is reduced demand for new plots. 22% of people would like a small 'micro plot'. Micro plots take up very little space compared to full or even half plots and would be a supportive environment for people new to growing.</p>	<p>Based on the evidence and through joint working a process has been agreed with the Allotment Federation which gives people a choice of plot size.</p> <p>It is proposed that micro-plots will be piloted by the Food Partnership and or Allotment Societies. If successful this will further reduce the waiting list.</p>
<p>Community Plots</p> <p>There are 30 community plots run independently by volunteers or larger charities working with specific client needs groups eg adults with learning disabilities,</p>	<p>The strategy sets out proposals to improve the management of community plots and seeks to increase the number of community plots in areas where there is a shortfall.</p>

people who have experienced homelessness or addiction. They are essential to ensuring allotments are accessible to more vulnerable residents	
Accessibility The allotment service needs to be accessible to all parts of the community. The research has shown that disabled people saw allotments as a means to contributing to their overall health and happiness to an even greater extent than those without disability.	The strategy has been subject to an Equalities Impact Assessment and further work will be done as part of the delivery of the strategy to engage with minority groups, and improve access through community plots and promotion of more accessible plots. Concessions will be maintained to reduce the financial barrier for people accessing the service.
Empty Plots The service relies heavily on 'Site Reps' to keep sites working effectively. One of the roles of the reps is to let new sites. Letting sites can involve a lot of work for these volunteers, particularly on larger sites. There will always be a number of un-let plots due turnover but opportunities to streamline the process will reviewed to minimise un-let plots	The letting process will be reviewed including support for Site Reps and improvements to the management of the waiting list.
New Allotment Sites The review of the waiting list has identified there is less need for new allotment sites at the present time.	Given the reduced pressure on the waiting list the focus of the strategy is on maintaining and improving the current offer of allotment sites. The need for additional sites should demand increase will be kept under review.
Conservation & Biodiversity The strategy process found evidence of good practice in terms of sustainability around composting, minimising use of chemicals and planting schemes that benefit pollinators. More work can be done in all these areas and in particular around management of water usage and water harvesting. The strategy seeks to build on this good practice to strengthen the contribution of allotments to conservation and biodiversity whilst recognising that their primary use is for food production.	Proposals to include sustainability such promotion of organic practices and minimisation of chemical use (eg through Brighton Organic Gardening Group), increasing composting and reducing water usage will be worked up as part of the Action Plan. The role of allotments in green networks and helping meet Biosphere Objectives will also be explored.
Volunteers The service and delivery of the Action Plan relies on a significant amount of volunteer time to help run allotments including the	Revised governance arrangements have been developed which include a plan to clarify roles and better support volunteers.

<p>Allotment Federation, Allotment Association and in particular Site Reps who help with the day to day running of the sites.</p> <p>Implementation of the Action Plan depends on effective joint working between the council and these volunteers and considerable thought has been given to how the partnerships can be improved.</p>	<p>A lot of the additional support will be provided by the Allotment Federation and existing volunteers.</p>
<p>Resources</p> <p>The strategy was produced at a time of significant budget cuts and has been developed with a view to improving efficiency and aiming for self sufficiency of the service.</p>	<p>Self management of sites will be piloted as a means of reducing the cost to the service.</p> <p>It is proposed that new plot holders will be asked to forgo their concession if they feel they do not need it and people will be asked to contribute more if they wish to do so.</p> <p>To help improve management of the waiting list strategy proposes the introduction of a small non-refundable fee to join the waiting list (£15) which would be ring fenced to the service and help fund support for people on the waiting list. It would encourage people to think more carefully about joining the list. People on concessions would be exempt.</p>

- 3.9 The strategy covers a ten year period and will be reviewed after five years. It provides a framework with detail of implementation of many recommendations to be worked out as part of the Action Plan. The Allotment Federation and Food Partnership are key delivery partners for the strategy. The Action Plan will be a live document which is monitored and updated annually.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 As part of the strategy development options on specific issues were considered in depth by the steering group. Proposals were tested at a public engagement event for members of the Allotment Federation.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The model of co-producing the strategy with the Allotment Federation and the Food Partnership has resulted in key partners engaging and co-owning the process. Response to the consultation was very high, with 900 plot holders responding. People on the waiting list were recognised as being part of the allotment community and they were also consulted with a further 900 responses.

- 5.2 The main themes coming out of the strategy were further tested at an engagement event. Workshops were held with smaller groups on particular issues including a workshop with Site Reps.

6. CONCLUSION

- 6.1 Allotments in Brighton & Hove have a wide range of benefits which are much wider than food growing and include social, environmental and health benefits. Over 6,000 people take part in allotment gardening.
- 6.2 The success of allotments relies on many volunteers who are passionate about the service. The strategy recommended for adoption has been co-produced with key partners and sets out framework to improve and strengthen the service. It is supported by an Action Plan which we will be delivered with key partners.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The budgeted net cost of providing the allotment service in 2013/14 is £50,000, including the cost of support service provision. The strategy will explore ways to improve the efficiency of the service and trial new models of working including self management on a pilot scale, and therefore improving value for money.
- 7.2 The strategy sets out proposals to increase income through a one off fee to join the waiting list which is expected to raise around £7,500 per year in extra revenue which will help fund some of the Action Plan particularly in relation to people on the waiting list. People will also be asked to forgo their concessions if they feel able to with the extra revenue supporting improving access to the service. The fees proposed in this report will be subject to the council's fees and charges policy and therefore reviewed annually considering the councils priorities.

Finance Officer Consulted: Steven Bedford

Date: 03/02/14

Legal Implications:

- 7.3 The proposed strategy will assist the Council in meetings its duties in relation to managing allotments and demand for them under the Allotments and Smallholdings Act 1908.

Lawyer Consulted: Elizabeth Culbert

Date: 05/02/2014

Equalities Implications:

- 7.4 The allotment service has a positive impact on physical and mental health and disabled people rate the benefits of allotments higher than people without. The service already engages with a range of vulnerable people and people who may be less able to access services, for example through community plots. The strategy seeks to build on this good work and improve the access to the service. The strategy has been subject to an Equalities Impact Assessment.

Sustainability Implications:

- 7.5 Evidence from the consultation shows many plot holders already adopt sustainable practices. Allotments cover a significant area of land and are an important component of the city's green infrastructure. As part of the strategy further work will be done to encourage minimum use of chemicals, minimise water wastage and encourage biodiversity.

Any Other Significant Implications:

- 7.6 None

SUPPORTING DOCUMENTATION

Appendices:

1. Allotment Strategy Summary
2. Draft Allotment Strategy
3. Action Plan

Allotment Strategy and Action Plan 2014 – 2024 for Brighton & Hove

Strategy Briefing



Weald Allotments (photograph courtesy of Brighton & Hove Food Partnership)



How the strategy has been developed

The Allotment Strategy is co-produced by Brighton & Hove City Council and the Brighton & Hove Allotment Federation (BHAF). A strategy steering group oversaw the process with the involvement of council officers, staff from the Public Health team and the Food Partnership. BHAF's team was elected from its membership and its participation in the strategy discussed at their AGM in March 2013. BHAF members were also invited to participate in strategy working groups that looked at land, governance, finance and research. Regular strategy updates were included in BHAF newsletters and on their website.

Key principles in developing the strategy were:

- **Partnership:** without the commitment of both the council and the Allotment Federation to jointly look for solutions and commit to resolving them together, this strategy could never have been written. This principle of partnership work will need to be maintained if this strategy is to be successfully implemented.
- **Informed by evidence:** this included open sharing of information with the strategy steering / working groups about the current way the service is delivered including detailed financial information.
- **That it would involve a setting down of current practices and future ambitions:** this is so that there is an understanding of where we are (even if the people involved now leave), where we want to be and a framework for making decisions in future.
- **A bottom up approach:** the strategy was built with a commitment to being led by the allotment community at its heart with time built into the process for consultation and engagement. Consultation included:
 - Two very detailed surveys – of plot holders (808), community plots (9) and of people on the waiting list (901) – which between them gathered over 1700 responses and generated an enormous wealth of information and opinion
 - A consultation event with over 50 attendees
 - A facilitated focus group with 12 site representatives
 - Interviews with key council staff

The consultation work with plot holders and the waiting list and the compilation of the strategy document has been supported by the Brighton & Hove Food Partnership. The Allotment Strategy and Action Plan is recognised as a key area of work in achieving the ambitions set out in 'Spade to Spoon Digging Deeper: a food strategy for Brighton & Hove' (2012).

Because many of the issues covered are of a long term nature the strategy set out a route map for the next 10 years. It is underpinned by an action plan which will be reviewed annually by the Allotment Liaison Group¹. A full strategy review will take place in 2019.

¹ A new liaison group with terms of reference will be established to include BHAF, BHCC and other stakeholders

The Vision

Enjoyable, inclusive, sustainable and affordable allotments for Brighton & Hove

Objectives:

- Provide an economic way for people to produce good quantities of high quality, locally grown food.
- Increase the number of people participating in food growing on allotments, so that all sections of the community – particularly the most vulnerable - can enjoy the benefits and fulfil their horticultural potential.
- Ensure sufficient availability of good quality, accessible land for allotments.
- Work towards a self-sustaining and efficiently run service that keeps down costs for both tenants and the council.
- Encourage on site participation to ensure the protection and promotion of allotments for food growing.
- Support the very best practice in growing, so that allotments are a source of education and inspiration for the whole city in good food and healthy living.
- Ensure that the allotment sites, alongside the main role of food growing, play a role in conserving the biodiversity of the city contributing to a healthy living environment.
- Take a co-operative and participative approach to running the service and developing allotment policies and practices.
- Ensure that learning and evidence gathered from the development of this strategy is shared within the city and used to inform other policy work.

Allotments in Brighton & Hove

In Brighton & Hove there are 3,092 plots² including 30 community plots on 37 sites managed by Brighton & Hove City Council. Evidence gathered during the strategy consultation process suggests that 6,000+ people take part in food growing on allotments.

The current waiting list is approx 1000 people with the waiting time for a plot generally being two-four years depending on the site.

In 2012/13, the rental income from allotments was £107,155 and the expenditure was £155,123. All the council's allotment income currently comes from plot rentals. The shortfall between income and expenditure, called the allotment service subsidy was approx £48,000 in 2012/13. The rental charge of an allotment in 2013 /14 is 28.56p per m² or 125m² (half plot) = £35.70, 250m² (full plot) = £71.40. This price includes the land rent (m²), water, security & fencing, basic maintenance and administration.

A 25% discount is applicable for the following groups – people over 60, residents in receipt of benefits and students. This discount aims to enable people who may most benefit from allotment growing but are not be able to afford the full rent to participate. The largest group of concessions are those aged 60+ with 704 plot holders getting this discount.

² As of October 2013

Purpose of allotments

The primary aim of allotments is to provide an economic way for people to grow their own healthy, affordable, sustainable food however as the evidence from the strategy consultation shows, allotments are about 'more than just the veg'. The benefits for the mental health and wellbeing of residents; and the role that allotments play in the city's network of green spaces are also reasons for ensuring that the allotment community in the city thrives.

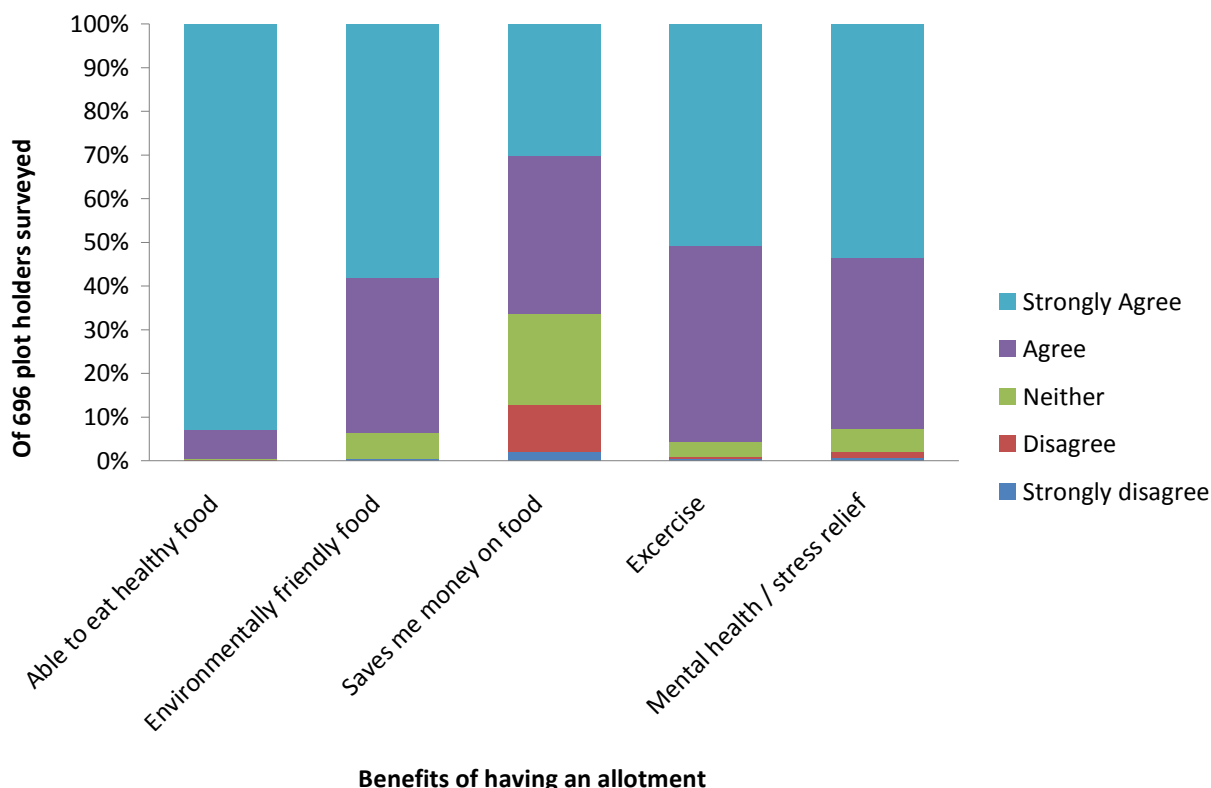
Summary of key findings / recommendations

- a) The process of developing this strategy has demonstrated that many people on allotments care passionately not just about their own plot but the wider allotment community (evidenced by the huge and detailed response to the consultation). This is an asset that this strategy seeks to recognise and build on. A **co-operative and participative approach** to delivering the strategy, overseeing the action plan and running the service will be needed going ahead if the ambitions set out in the strategy are to be achieved. The strategy makes recommendations around structures for governance and communications to facilitate this.
- b) **Allotments support healthy living** and provide a wide range of benefits (see following chart). A very significant number of plot holders surveyed as part of the strategy development process (n=696) agreed or strongly agreed with the statements that a benefit of having an allotment was to eat healthy food (98%) or for general exercise (96%). 80% of respondents agreed or strongly agreed that their allotment was about positive mental health and 72% agreed that they feel part of a community.

People viewed their allotment as having a powerful impact on their overall health and happiness with 74% giving this a score of eight or more out of ten. Overall, Allotmenters rated their health as better than the general population³. The survey of the community plots suggests that the main benefit derived by their service users / clients / volunteers is positive mental health. Allotmenters reported that while saving money overall on your food bill may not be the main benefit, an allotment did allow them to make food choices (eg organic or healthier food) that they wouldn't otherwise have been able to.

³ Comparing answers to the same question asked in the 2012 health counts survey

Chart: The benefits of having an allotment taken from the plot holders survey 2013



- c) Allotment provision for both the population as a whole and for vulnerable groups in particular should be regarded as **an effective intervention for the prevention of ill health** and evidence gathered from the plot holders survey should be incorporated into the city's Joint Strategic Needs Assessments and decision making about public health. More work should be done to understand how participation in food growing by certain groups could lead to savings in health / social care costs. The findings of the research and consultation work that inform this strategy should be shared widely.

"It would not be possible for me to put a price on the significance that having an allotment has had for me in terms of improvement to my physical and mental well-being. I am able to harvest a small but reasonably sized amount of produce from my small half plot-all delicious of-course! But the primary benefits are social and spiritual. I can't imagine my life now, without having an allotment."

Plot holders survey respondent 2013

- d) The strategy recommends that work should be done to ensure that the allotment sites, alongside the main role of food growing, **play a role in conserving the biodiversity of the city**. The strategy process found evidence of good practice in terms of environmental sustainability around composting, minimising chemical use and planting schemes that benefit pollinators but more that can be done around management of water usage / rainwater harvesting. With the allotment service water bill coming to £25,000 a year⁴ and Brighton & Hove being identified by national government as an

⁴ It should also be noted that old infrastructure / leaky pipes are also a factor in this.

area of 'serious water stress' this is a key area for action. If successful the Biosphere Reserve bid will provide more opportunities for work on allotments and bio-diversity.

- e) The Allotment Strategy makes recommendations around **accessibility** and how to ensure that all sections of the community can participate. This includes specific promotional activity with communities of interest, work to ensure that suitable plots are available for those with limited mobility, a feasibility study on the possibility of 'fast tracking' applications from certain priority groups and support for community plots. The strategy also recommends **protecting the concession discount** of 25% on allotment rent.

- f) **Community plots.** There are 30 community plots independently run by volunteers or part of larger charities working with specific client groups, such as adults with learning disabilities, families from a deprived neighbourhood, people who have experienced homelessness or addiction. Community plots can be open to the public or for use on a referral basis. Community plots are a crucial part of ensuring that allotments are accessible for vulnerable residents. The strategy recommends that separate rules for



Carers Centre Allotment Plot at Craven Vale
(photograph courtesy of BHFP)

- community plots should be considered and that applications from community groups in areas of the city where there aren't community plots and/or with communities of interest that are under-represented should be fast-tracked. The strategy recommends that the Food Partnership continues to work with community plots to support them to attract volunteers, to share information about how to apply for small grants and access resources and provide opportunities to network with others doing similar work. Where community plots run on an open access basis better links should be made with those on the waiting list.

- g) **Choice of plot size.** Evidence from the strategy development process suggests that most people (80%) are happy with their current plot size however there was overwhelming support for there to be a choice of plot sizes. The strategy therefore recommends a change from the current policy of only letting half plots and suggests mechanisms for how this should be managed. This will include options for full plots (250m²) and half plots (125m²) for both those joining the waiting list and those currently growing. The strategy also recommends that smaller **individual beds are introduced** to respond to the demand for smaller individual plots. Action will be taken to ensure that there is balance of plot sizes, clear mechanisms for changing size and that people are well informed about the time commitments involved in different options.



Photo: E. Guthridge

- h) **Waiting list: better management.** As part of the strategy development, in October 2013, people on the waiting list were asked to reconfirm that they still wanted

an allotment to better gauge the real size of the waiting list and at the same time to clean up the list so it would be a more effective tool for lettings. The number actually waiting for an allotment is much lower than previously thought, approximately 1,000 people (rather than 2,200) although this figure does not take into account latent demand for allotments, ie the people who did not join because the waiting list for that site was closed, or did not bother to apply because they were told they would have to wait several years. A yearly update to check that you want to remain on the waiting list was considered to be a good idea by 96% of the 696 people on the waiting list that answered this survey question and 98% of them said they would also like to be kept informed of their position on the waiting list. It is recommended that when people apply for a plot and when they are updated on their waiting list position, they should be told if there is any spare capacity at any other sites in the city.

There should be greater involvement of and opportunities for people on waiting lists (training, information about site open days, and co-working opportunities). More should be done to ensure that people have excellent information about the time different size plots require and the alternative options for food growing before they decide to join the list. It is recommended that an annual report on the time people are waiting for an allotment is produced in order to understand demand as well as information on the total number of people on the waiting list. In order to facilitate better management of and greater engagement with the waiting list it is recommended that a small one off non-refundable charge is made for joining the list.

- i) **Empty plots.** Based on figures from November 2013, there are over 400 un-let plots, representing an annual lost income of around £15,000 as well as causing frustration to both plot holders and those on the waiting list. While it is recognised that some plots will inevitably remain vacant whilst they are in the process of being let, it is recommended that this figure is reduced via streamlining the lettings process including improved ICT systems; and supporting site representatives to get better in managing lettings.
- j) **New plot holders** in particular need better training and information about what to do when they get started. A new plot holders information pack and opportunities to be mentored by more experienced growers should be introduced. Often plots are in disrepair when inexperienced people take them on. Far too often people quickly lose interest or are overwhelmed by how much work is needed in the first six months and don't work their plot leaving the space to become even more overgrown. Once plots are overgrown they are harder to let and harder to cultivate; and spread weed seeds to other nearby allotments. New plot holders said they wanted more information about what they should do first, where to borrow tools and buy basic equipment, opportunities for learning before they got given their plot (last year on the waiting list) and the chance to learn from more experienced allotmenters. The **new plot holders probationary period** should be used more effectively; for example if people are coming up regularly and working hard then those doing the inspections shouldn't be too strict about cultivation percentages and weed notices (as this caused stress) but if people haven't come up at all in the first three months get them off quickly and a new person on.

- k) While the clearest need for **information and training** is for new plot holders the strategy also recognises that more can be done to support all allotmenters to become better growers for example increasing the number of people who grow year round (thereby increasing the amount of food produced) and supporting environmentally friendly growing practices. Regular communication from the Allotment Federation about opportunities to take part in learning, sharing of good practice information as well as providing inspiration and encouragement should continue.
- l) Allotmenters already contribute thousands of hours each year in **volunteer time** to help run allotments. Volunteers run the Allotment Federation and Site Associations, managing lettings and cultivation notices (Site Reps) and are used for tidy up days and routine maintenance at some sites. The strategy recommends providing greater **clarity on the role of Site Reps**, establishing mechanisms by which these roles are elected and improving the training and support available to them to ensure that there is consistency and fairness across the service. The strategy also recommends increasing the opportunities for people who want to volunteer for example helping with open days, mentoring new plot holders or taking part in routine maintenance. Methods for ensuring that volunteers are supported will need to be introduced to prevent 'burn out'.
- m) This strategy seeks to **work towards a self-sustaining and efficiently run service that keeps down costs for both tenants and the council**. In the current financial situation the council may have to make allotments, along with many other services, self-financing. In 2013 the council compared the cost of rent for their allotments with elsewhere in the country and Brighton & Hove was roughly in the middle. The strategy recommends that rent rises should be minimised as far as possible and other avenues explored for reducing costs and generating revenue. There was a consensus that work can be done to improve the **efficiency and effectiveness** of the service. For example introducing methods of electronic communications and annual direct debit payments freeing up staff time currently spent on invoice renewal letters. The use of ICT in the service needs to be reviewed in order to improve efficiency. The strategy recommends that **additional sources of revenue are explored**, especially services which would benefit plot holders as well as generate income for example deliveries of woodchip or mulches and construction of sheds or raised beds. **Grants / sponsorship** for certain pieces of work (eg advice around water management) will also be sought.

"When you first get a plot you get sent a list of rules of all the things you shouldn't do but no-one tells you what you should do!"

Plot holders survey respondent 2013

While **concessions** are an important strand of work to ensure accessibility the annual costs (in terms of reduced rental income) is £9,700. The strategy recommends that the option to turn down a concession if this is not needed should be promoted. The strategy recommends that there should be an option to pay a higher rent for those on higher incomes. This should be offered on a voluntary (honesty) system; it should be simple to administer; and it should be clear where the money is going, eg to the allotment improvement fund (for site improvements) or to continue to offer subsidised allotments to those on concessions.

Longer term plans include further work to explore if allotments save money on health care in the city particularly for older people and those with mental or physical health conditions and therefore there is an argument for exploring if concessions for

vulnerable groups could be funded via the public health budget (while recognising that these budgets are also under pressure).

- n) Looking to the longer term, there are also recommendations around more **self-management** on site - not just as a way of saving money but also of strengthening community involvement and participation. There is the potential to offer a more responsive and efficient service for less money than if this is provided by the council. For example, a site association volunteer could replace a broken padlock with a new one supplied by the council rather than calling out the maintenance team. A further step would be to pilot 'self-



management' as happens on some allotment sites in other parts of the country. This would mean that the budget and responsibility for running the site would be passed to an association or similar body on the site. At least one (hopefully more) site will pilot self management in the next five years to explore the benefits / risks and potential savings in this approach. While managing the service on a citywide level makes sense in terms of billing and administration sites across the city vary considerably and the strategy recommends that there is more flexibility on how decisions are taken at a site level for example some flexibility around rules.

- o) There is considerable difference across the city ranging from little or no communication and involvement at a site level to site associations that run shops, organise open days and help with running the site. The strategy recommends that all sites are encouraged to undertake activities to **encourage on site participation**. The allotment development fund (managed by BHAF) can be used to invest in notice boards or improve site infrastructure to aid this and, from 2014, the fund can be used to help establish **more site associations**. A stronger sense of community on site was felt to be an important element in addressing problems of theft and vandalism. Site open days are recommended as a way for potential plot holders to find out about what is involved and for co-workers and those who want help with their plot to meet. Allotmenters wanted ways to swap and share equipment and materials and these will be established. At a citywide level the Allotment Federation will continue to work to ensure that it is able to engage with its members in a variety of formats (online and in person).

A copy of the full strategy will be available from www.bhaf.org.uk from 30 March 2014. Before that date, please email bfaf.contact@gmail.com.

Brighton & Hove Allotment Strategy 2014-2024



[logos] Brighton & Hove Allotment Federation, Brighton & Hove City Council

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Foreword

Because many of the issues covered in this document are of a long term nature this strategy sets out a route map for the next 10 years. It is underpinned by an action plan for the next three years which will be reviewed annually by the Allotment Liaison group. A strategy review will take place in 2019. This strategy has been produced in partnership and is jointly owned by Brighton & Hove City Council and the Brighton & Hove Allotment Federation. It is supported by the Brighton & Hove Food Partnership and recognised as a key area of work in achieving the ambitions set out in *Spade to Spoon Digging Deeper* the city's food strategy. The findings of the research and consultation work that inform this strategy are also important for broader work on health and wellbeing, healthy ageing, physical activity and environmental sustainability and evidence gathered will be shared widely including with Public Health, the Health and Wellbeing Board and the Local Strategic Partnership.

The strategy was developed over 2013 led by an Allotment Strategy Working Group.

The group first met in December 2012 and included:

Brighton & Hove City Council	Brighton & Hove Allotment Federation (BHAF)	Other BHAF members on Strategy Working Groups
Gillian Marston	Alan Phillips	Hannes Froehlich
Jan Jonker	Mark Carroll	Teresa Cairns
Robert Walker	Allan Brown	Henry Christie
David Cooper	Russ Howarth	Richard Howard
Graeme Rolf	Anne Glow	Hilary Standing
Brighton & Hove City Council Public Health	Emily Gardiner	Saskia Wesnigk-Wood
Barbara Hardcastle	Simon Powell	Melanie Matthews
		Giuseppina Salamone
		Gerry Nevill
Brighton & Hove Food Partnership	National Association of Allotments	
Vic Borrill	Paul Neary	
Emily O'Brien		
Helen Starr Keddle		

A huge amount of effort went into strategy development by these and others including over 700 hours of unpaid volunteer time from the Allotment Federation. This strategy is underpinned by the opinions of the allotment community including the 1700+ people who participated in surveys and the 70+ who attended meetings or events, many of whom also contribute a huge amount of voluntary work on allotment sites. Thank you to them all!

Abbreviations

BHCC = Brighton & Hove City Council

Summary of key findings and recommendations

This strategy aims to make allotments enjoyable, inclusive, sustainable and affordable for the people of Brighton & Hove.

It is jointly produced by Brighton & Hove City Council and Brighton & Hove Allotment Federation who worked in partnership to consult the city's allotment community. The strategy is informed and guided by evidence from the consultation and sets down current practices and future ambitions.

Brighton & Hove's allotment community is comprised of 6000 food growers with 3100 plots on 37 sites. The strategy emphasises increasing the number of people growing high quality local food by ensuring the availability of good quality land. It promotes a self- sustaining and efficient service, encourages site participation, while fostering biodiversity, organic practices, good food and healthy living. It encourages a cooperative approach.

Around 1800 people were involved in developing the strategy, many of whom contributed substantial time to respond to surveys that generated valuable and detailed evidence. Almost everyone stated that the major benefits of allotments included access to healthy food and general exercise. Whilst allotments did not bring about major savings on food bills, individuals and families reported that they felt able to make better choices (e.g. organic or healthier food).

A large majority thought that their allotment has a powerful impact on their overall health and happiness, relieving stress and improving their mental health; while many enjoy being part of a community. In comparison to the general population, allotmenters feel healthier. Charities and community groups run 30 community plots providing access and facilities for vulnerable people. They too emphasise the benefits of allotments for good mental health.

It is clear that more work should be done to understand how participation in food growing can lead to savings in health and social care costs and a better quality of life. The findings of this research should be shared widely.

The Allotment Strategy makes recommendations on accessibility to ensure that all sections of the community can participate. This includes protecting the

concessionary discount of 25% on allotment rental; targeting those who may benefit most, and ensuring that suitable plots are available for those with limited mobility. A feasibility study is needed on the possibility of 'fast tracking' applications from certain priority individuals and community groups.

Many people on allotments care passionately about their own plot and the wider allotment community. This is an asset that this strategy seeks to recognise and build on. A co-operative and participative approach is essential for delivering the strategy, overseeing the action plan, and running the service if the ambitions set out in the strategy are to be achieved. The strategy makes recommendations around structures for governance; developing allotment rules; and communication to facilitate this building on the trust and goodwill of the strategy processes.

Four out of five people reported being happy with their current plot size; however there is overwhelming support for introducing a choice of plot sizes, changing the current policy of only letting half plots. This choice will include full plots, half plots and the consideration of the introduction of new smaller individual beds. An important finding is that the number of people on allotment waiting lists is possibly half the number previously thought, about 1000 people.

An improved, chargeable service should be introduced for those on the waiting list. People should be kept informed of their position on the waiting list, know if there is spare capacity at other sites and have information on training, site open days, and co-working opportunities. There should be better information about the time commitment for different size plots and the alternative options for food growing. Once they start renting an allotment many allotmenters want better training and information and to have opportunities to be mentored by more experienced growers.

In 2013 there were over 400 empty plots, representing lost income and causing frustration to plot holders and those on the waiting list. This figure needs to be reduced via streamlining the lettings process, giving better support to site representatives, who manage lettings; and improving ICT systems.

Allotments play an important role in conserving the biodiversity of the city. There is good practice already around composting; growing organically; minimising chemical use; and planting schemes that benefit pollinators / bees, but more can be done around the management of water usage and rainwater harvesting.

Allotmenters already contribute thousands of hours each year in volunteer time. Volunteers run the Allotment Federation and Site Associations, manage lettings and cultivation notices (Site Representatives) and organise social events, tidy up days and/or routine maintenance at some sites. The strategy recommends providing greater clarity, accountability and support for the role of Site Representatives, while encouraging more people to participate and increasing the range of opportunities for volunteering.

There is considerable difference in levels of on site participation by allotmenters across the city ranging from little or no involvement to site associations that run shops, organise open days and help with running the site. The strategy recommends that all sites are encouraged and helped to undertake activities that encourage on site participation and communication.

This strategy seeks to work towards a self-sustaining and efficiently run service that keeps down costs for both tenants and the Council. Rent rises should be minimised and avenues explored for reducing costs. Additional sources of revenue should be explored, especially services which would benefit plot holders as well as generate income. Grants or sponsorship for certain pieces of work should be sought. There should be a voluntary option to pay a higher rent for those on higher incomes. If a concession is not needed, the option for individuals to waive it voluntarily should be promoted. In parallel, consideration is needed on whether concessions for vulnerable groups could be funded via the City's public health budget.

In the longer term, exploring greater self-management on site is needed to strengthen community involvement, encourage participation while promoting sustainability and reducing costs.

Introduction

Purpose of allotments

Allotments are primarily about **growing food** however as the evidence from the strategy consultation shows, allotments are about 'more than just the veg'.

The benefits for the mental health and wellbeing of residents; and the role that allotments play in the city's network of green spaces are also reasons for ensuring that the allotment community in the city thrives.

Why and how was this strategy was developed

Why an allotment strategy for Brighton & Hove?

- A lack of an agreed allotment strategy in the past had meant confusion about how priorities had been decided, and how decisions were made, leading to communication breakdown between stakeholders.
- This strategy was developed against a background of reduced funding available to the City Council, which led to controversial price increase proposals for allotment holders in 2012. Other issues were opposition to the council policy on only letting half plots and frustrations around the length of the waiting list.
- The city's food strategy *Spade to Spoon: Digging Deeper 2012* recognised the importance of allotments in achieving the ambitions of a sustainable food system and recommended that strategic work on this issue be undertaken.
- Plot holders and people on the waiting list were telling the Council and Allotment Federation how important allotments were to them, and asking for the opportunity to contribute ideas on how the city's allotment could be run in the future.
- With 3000+ plot holders and at least twice that number of people involved in allotments, their reasons and benefits will differ. The production of a strategy sought to respect different motivations and respond to the changing demographics of allotmenters; and maintain a fair service whilst keeping a firm eye on the primary purpose of allotments – food growing.

How has the strategy been developed?

The Allotment Strategy is co-produced by Brighton & Hove City Council and the Brighton & Hove Allotment Federation (BHAF). A strategy steering group oversaw the process with the involvement of Council Officers, staff from the Public Health team and the Food Partnership. BHAF's team was elected from its membership and its participation in the strategy discussed at their AGM in March 2013. BHAF members were also invited to participate in strategy working groups that looked at land, governance, finance and research. Regular strategy updates were included in BHAF newsletters and on their website.

Key principles in developing the strategy were:

- **Partnership:** without the commitment of both the council and the Allotment Federation to jointly look for solutions and commit to resolving them together, this strategy could never have been written. This principle of partnership work will need to be maintained if this strategy is to be successfully implemented.
- **Informed by evidence:** this included open sharing of information with the strategy steering / working groups about the current way the service is delivered including detailed financial information.
- **That it would involve a setting down of current practices and future ambitions:** this is so that there is an understanding of where we are (even if the people involved now leave), where we want to be and a framework for making decisions in future.
- **A bottom up approach:** the strategy was built with a commitment to being led by the allotment community at its heart with time built into the process for consultation and engagement. Consultation included:
 - Two very detailed surveys – of plot holders (808), community plots (9) and of people on the waiting list (901) – which between them gathered over 1700 responses and generated an enormous wealth of information and opinion
 - A consultation event with over 50 attendees
 - A facilitated focus group with 12 site representatives

- Interviews with key council staff

The consultation work with plot holders and the waiting list and the compilation of the strategy document has been supported by the Brighton & Hove Food Partnership.

The Allotment Strategy and Action Plan is recognised as a key area of work in achieving the ambitions set out in 'Spade to Spoon Digging Deeper: a food strategy for Brighton & Hove' (2012). There is detailed information on the consultation which took place in [Appendix 1: Consultation for the Allotment Strategy](#).

Because many of the issues covered are of a long term nature the strategy set out a route map for the next 10 years. It is underpinned by an action plan which will be reviewed annually by the Allotment Liaison Group¹. A full strategy review will take place in 2019. This is a living document that will require adaptation over time.

Implementing the strategy

This strategy includes an action plan. During Year 1 the strategy steering group will meet quarterly to ensure that momentum against the action plan is maintained and to allow the proposed new structures for the governance of allotments to become established.

The strategy recognises the funding constraints faced by the allotment service and that some of its aspirations will be dependent on securing additional funding.

¹ A new liaison group with terms of reference will be established to include BHAF, BHCC and other stakeholders

Vision and Objectives

The Vision:

<i>Enjoyable, inclusive, sustainable and affordable allotments for Brighton & Hove.</i>
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The Objectives:

1. Provide an economic way for people to produce good quantities of high quality, locally grown food.
2. Increase the number of people participating in food growing on allotments, so that all sections of the community – particularly the most vulnerable - can enjoy the benefits and fulfill their horticultural potential.
3. Ensure sufficient availability of good quality, accessible land for allotments.
4. Work towards a self-sustaining and efficiently run service that keeps down costs for both tenants and the Council.
5. Encourage on site participation to ensure the protection and promotion of allotments for food growing.
6. Support the very best practice in growing, so that allotments are a source of education and inspiration for the whole city in good food and healthy living.
7. Ensure that the allotment sites, alongside the main role of food growing, play a role in conserving the biodiversity of the city contributing to a healthy living environment.
8. Take a co-operative and participative approach to running the service and developing allotment policies and practices.
9. Ensure that learning and evidence gathered from the development of this strategy is shared within the city and used to inform other policy work.

Allotments: The Context

History of allotment provision

Allotments came about as a result of the Enclosure Acts of the 18th and 19th Centuries. These were a series of Acts of Parliament which enclosed the open fields and common land across the country and removed the existing rights of local people to grow food on previously common land.

The right to an allotment was promoted by the Victorians and was eventually made law in the '1908 Smallholdings and Allotments Act'. Allotments were traditionally rented by those on lower incomes but during the World Wars and the 'Dig for Victory' campaigns they were more widely used. There is more information on allotment legislation in [Appendix 3: Allotment legislation & modern interpretation](#).

Allotments in Brighton & Hove

The service is managed by the City Council on land owned by them. It is one of the largest allotment services in the country. There are 37 allotment sites with 3092 plot holders². There are 30 community plots used by volunteers and/or service users of voluntary sector organisations. Three sites provide specific features for limited mobility users (18 plots). The response to the strategy survey suggests that 6000+ adults regularly take part in allotment gardening.

In addition to allotment growing, there is a thriving grow-your-own culture in the city including 45 community food growing projects on land other than allotments.

Profile of plot holders

More information on plot holders can be found in [Appendix 1: Consultation for the allotment strategy](#) but some key points to note are:

Information from Council statistics on plot holders (as of Sept 13)

- Plot holders are now 45% male, 53% female (2% not known/not applicable) - whereas in the past more men were plot holders than women
- The majority are in the 44-63 year old age bracket
- 412 (or 15%) are over 64
- Over time the profile of the allotment community has been getting younger.

² In October 2013

Information gathered from the plot holders' survey (808 responses)³

- 20% use their plot with children
- 25% of allotmenters garden alone
- 9.5% consider themselves to have a disability
- 32.5% are full time employed
- There is a fairly even distribution across different income brackets.

There is more information on specific groups of users in [Allotment accessibility](#).

Concessions

The Council offers a concession of 25% on allotment rent for certain groups of people. This concession has to be applied for and is taken up by around a quarter of plot holders. Concessions are for people over 60, residents in receipt of benefits (income support / disability benefits) and students. The largest group of concessions are those aged 60+ with 704 (23% of plot holders) getting this discount. Not all allotmenters that are eligible for a discount choose to apply for it.

Waiting list / vacant plots

Work undertaken as part of this strategy review suggests that the current waiting list for plots is approximately 1000 people, with the average waiting time for a plot around 2 years - depending on the site.

At the end of 2013 there were 400+ vacant plots in the city and managing vacant plots / waiting list demand is a key area of this strategy. For more detail see [Waiting Lists and Demand for Allotments](#)

Plot size

In Brighton & Hove there are a variety of plot sizes most are either 250m² plots referred to as 'full plots' and 125m² plots referred to as 'half plots'.

³ At the time the survey was undertaken the full number of plot holders was calculated as 2716 so this is an impressive response rate of approx 30%. Independent evaluation work undertaken as part of the process suggests that the survey sample is representative of plot holders in terms of gender, site, plot size, concession and reason for concession although slightly less so for age (survey slightly younger sample). For more information see Appendix 1.

Since 2008 plot splitting and re-opening of derelict allotment land has led to an increase in the total number of people growing on allotments - with 3111 available plots as opposed to 2311 in 2008. However restricting people to a half plot and splitting in half every full plot that became available was an approach that the Allotment Federation and a number of Site Associations did not agree with for reasons that are outlined in [Appendix 7: Brighton & Hove Allotment Federation reasons for opposing further splitting of plots](#). These include their view that a half plot is not enough land to grow sufficient food to feed a family on or practise proper crop rotation and that smaller plots lead to overcrowding, increased administration and an over-cultivation of land with a loss of bio-diversity.

Understanding and addressing this complex issue of balancing demand with an appropriate provision of land suitable for differing needs was a key issue for this strategy. For more information see [Land, plot size and plot splitting](#).

Costs

In 2012/13, the rental income from allotments was £107,155 and the expenditure was £155,123. All the council's allotment income currently comes from plot rentals. The shortfall between income and expenditure, called the allotment service subsidy was approx £48,000 in 2012/13

The rental charge per m² of an allotment in 2013/14 was 28.56p. This means that a half plot (125m²) cost £35.70; and a full plot (250m²) cost £71.40. This price currently includes the land rent (m²), water, security & fencing, basic maintenance and administration.

The [Resources and finance](#) section gives more information on costs and charges.

Why allotments are important for our city

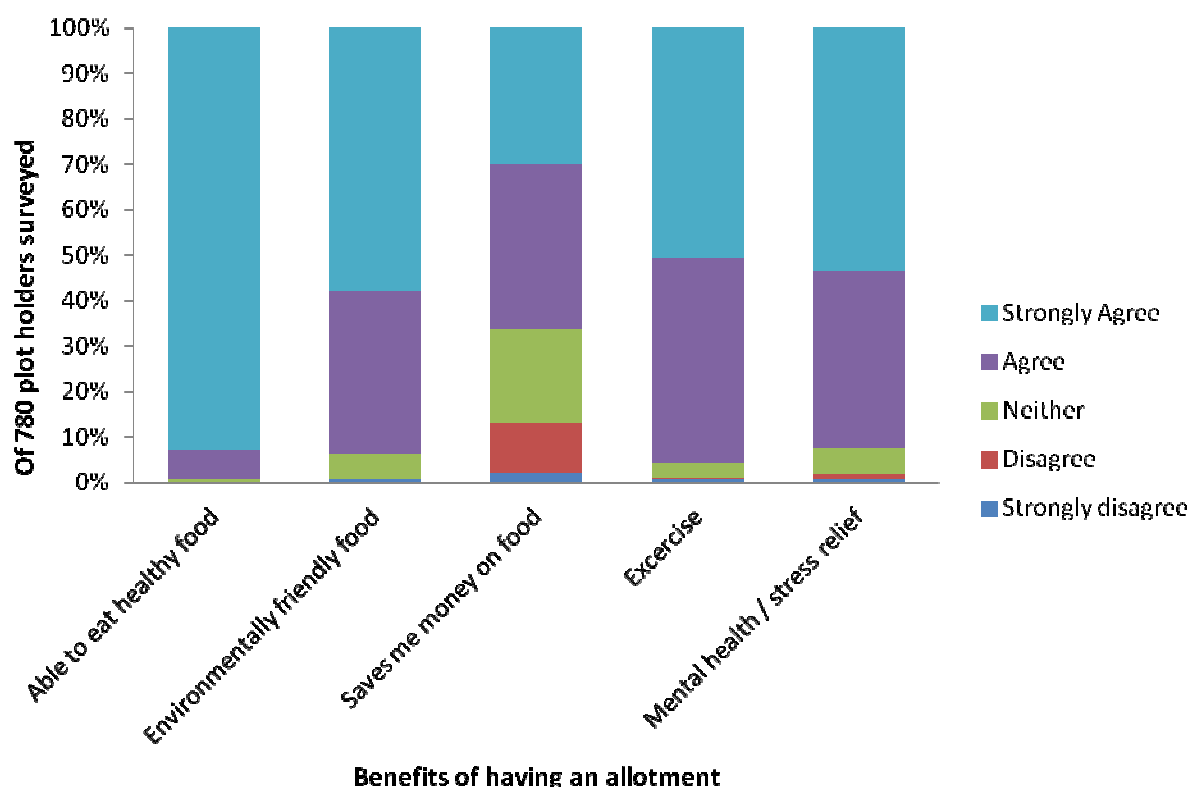
Benefits of Allotments

The survey of plot holders asked respondents to rate the benefits of having an allotment against the following areas:

- I am able to eat healthy food
- My food is grown with low environmental impact
- It saves me money on my food bill
- I am more aware of nature and the environment
- I can meet and socialise with people of different ages and backgrounds
- To improve mental health / provide stress relief
- General exercise

Overall there was strong agreement with all of the benefits statements. For detailed analysis of this section of the survey see [Appendix 1: Consultation for the Allotment Strategy](#)

Benefits of having an allotment responses from the plot holders survey 2013



The survey also asked plot holders to rate their overall health and their perception of the impact of their allotment on their health and happiness. People viewed their allotment as having a powerful impact on their overall health and happiness with 74% giving this a score of 8 or more out of 10.

The majority of allotmenters from the survey say that having an allotment is about access to healthy and sustainable food but 80% also feel that allotments benefit their mental health, 95% say it is good exercise and 72% say they feel part of a community.

Plot holders reported (free text comments and consultation events) that whilst saving money overall may not be the main benefit; an allotment did allow them to make food choices (e.g. organic or healthier food) that they wouldn't otherwise have been able to. The younger age groups tend to see growing food with low environmental impact as a particular benefit.

A striking difference in terms of the seven benefits listed was that people with disabilities saw greater benefit for all seven compared to those people without disabilities. The main differences were seen in terms of saving money on food bills,

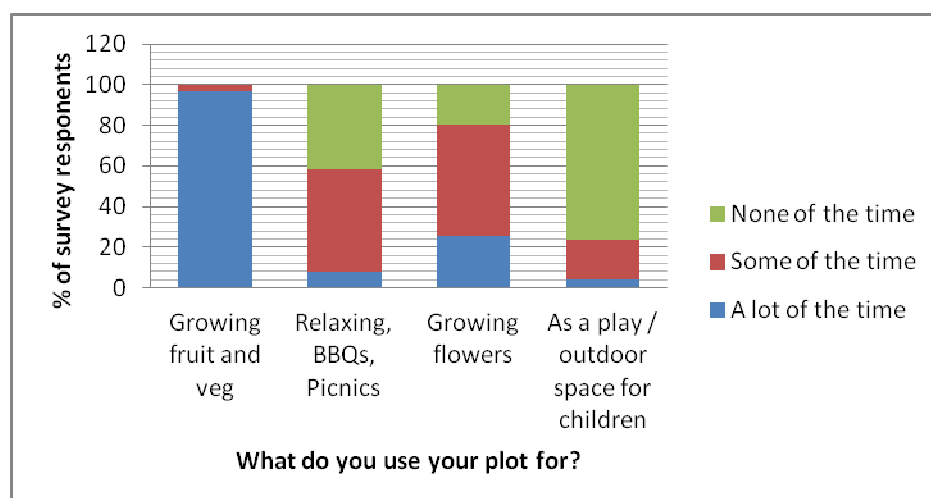
being more aware of nature and the environment, improving mental health and general exercise.

In comparisons across the employment groups it appears that unemployed people perceived greater benefits than employed people in particular for accessing healthy food, saving money, mental health and general exercise. The highest rating for the benefit being saving money came from unemployed people. Retired people and carers reported high benefits in terms of socialising and general exercise.

Access to food grown yourself

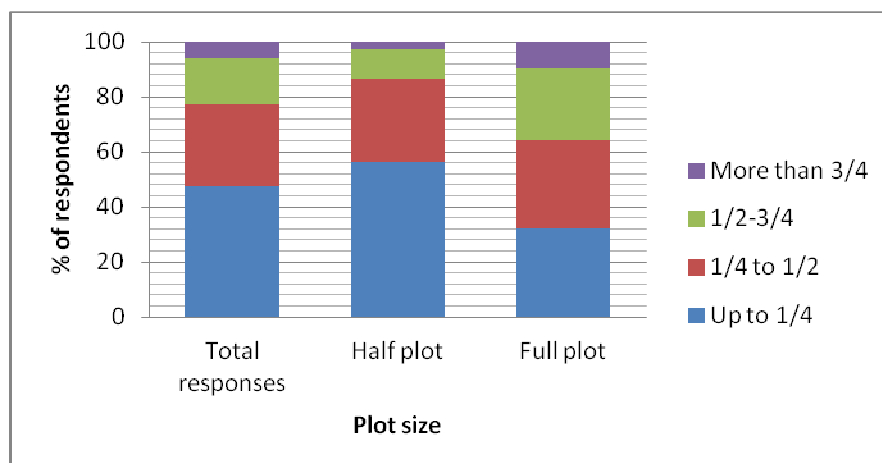
As defined by the Allotments Act of 1922 allotments are *wholly or mainly cultivated for the production of vegetables or fruit crops*. A plot in Brighton & Hove can also be used for growing flowers or as a leisure area as defined by the allotment rules for the city.

The plot holder survey asked people what they use their plot for



The survey also asked people what proportion their fruit and veg consumption came from their plot. It can be seen that of the plot holders in the survey (77%) get less than half of their fruit and veg from their plot.

Averaging it out over the year what proportion of your fruit and vegetable consumption comes from your plot?



Not surprisingly given the smaller amount of land those on half plots generally report a lower proportion (56% said less than $\frac{1}{4}$ compared to 32% of those on a full plot). However an average fruit and veg consumption per day per person in the UK is 258g⁴ so this is still a significant amount of food being produced on allotment land in the city. Further research here may be helpful.

When compared back to the seven general benefits, those who reported increased levels of fruit and veg consumption provided by their plot were also more likely to report increased benefits in terms of eating healthily, growing food with low environmental impact and saving money on food bills. Therefore those that grow a greater proportion of their food gain greater benefits.

Interestingly, there was no difference in improving mental health or stress release according to the proportion of fruit and veg consumption provided by the plot. This particular benefit was seemingly universal for all allotmenters, regardless of how much of their fruit and veg consumption was provided by their allotment.

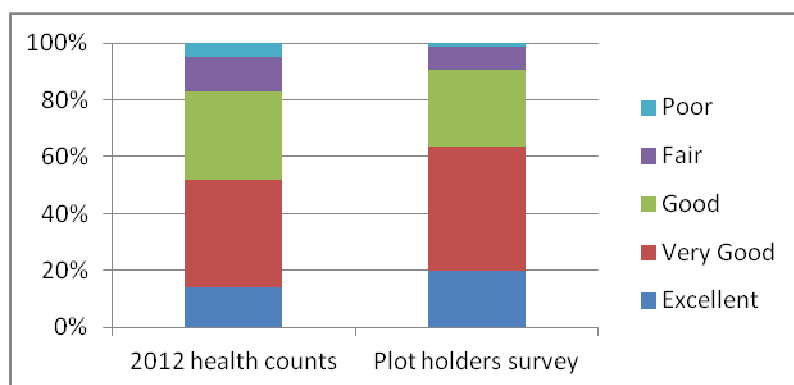
Health and Mental Health Benefits

Those answering the plot holders survey (n=787) were asked to rate their overall health. The same question was asked in the 2012 health counts survey⁵

In general would you say your health is

⁴ <http://www.eufic.org/article/en/expid/Fruit-vegetable-consumption-Europe/>

⁵ <http://www.bhlis.org/surveys>



From this it can be seen that in general allotmenters say they have better health than the general population.

Allotmenters were asked to consider the extent to which having an allotment is an important factor in their health and happiness (on a scale of 1-10 with 10 being the highest). 90% of plot holders surveyed believed that allotments were important to their health (range 7 to 10) and a remarkable 42% gave this figure a top rating of 10. More women reported that having an allotment was an important factor in their health and happiness than men and the older age groups especially agreed that the allotment contributes to their overall health and happiness.

Unemployed people rated their health as the poorest of all employment groups, although they provided one of the highest ratings for the allotment acting as an important factor in their health and happiness. In general, people with a disability provided a lower score for their overall health – 50% rated it as fair or poor relative to 4.1% of those not having a disability.

Those with a disability saw the allotment as a means of contributing to their overall health and happiness to a greater extent to those without a disability.⁶ Clearly, having an allotment plays a valuable role in people's health and happiness, particularly for those people with disabilities and unemployed people.

It would not be possible for me to put a price on the significance that having an allotment has had for me in terms of improvement to my physical and mental well-being. I am able to harvest a small but reasonably sized amount of produce from my small half plot-all delicious of-course! But the primary benefits are social and spiritual. I can't imagine my life now, without having an allotment – Plot holders survey response

⁶ mean score of 9.19 versus 8.44

Healthy diets and exercise

A very significant number of plot holders agreed or strongly agreed with the statements that a benefit of having an allotment was to eat healthy food (98%) or for general exercise (96%).

Obesity is estimated to have cost the NHS in Brighton & Hove £78.1 million in 2010⁷. York University⁸ state that the [cost of Diabetes](#) is approximately £23.7 billion with direct and indirect costs in the UK in 2010/11. Locally, the Clinical Commissioning Group (NHS Brighton & Hove) spent £3.1 million on prescriptions for Diabetes items between April 2012 and March 2013⁹, which is equivalent to £302 per adult with diabetes.

Forms of Diabetes are preventable through the consumption of good food and undertaking healthy exercise. NICE guidance¹⁰ emphasises local action to promote a healthy diet and physical activity among communities at high risk.

Mental health and wellbeing

In England, mental health conditions cost approximately £105 billion a year, due to loss of earnings and associated treatment and welfare costs¹¹. Up to one person in four experience some form of mental health illness in their lifetime.

92% of survey responses from plot holders agreed or strongly agreed with the statements that a benefit of having an allotment was to improve mental health / provide stress relief

Factors that are known to support emotional wellbeing have been developed by the New Economics Foundation into 'Five Ways' based on five simple messages about what helps to maintain positive mental health

Connect – Be active – Take notice – Keep learning – Give

⁷ NHS Brighton & Hove Public Health Directorate (2011)

⁸ York Health Economic Consortium Report, Journal of Diabetes Medicine (2012)

⁹ Diabetes Community Health Profiles 2012/13 developed by Yorkshire and Humberside Health Intelligence.

¹⁰ <http://guidance.nice.org.uk/PH35>

¹¹ Centre for Mental Health 2010

Allotments provide an ideal setting to take part in activities that maintain positive mental health as can be seen by the survey results.

From the plot holders survey:

- 701 people agreed or strongly agreed that having an allotment made them more aware of nature and the environment
- 590 felt they were good places to meet and socialise with people of different ages and backgrounds
- 779 people agreed or strongly agreed that their site was a friendly place
- 562 agreed or strongly agreed that they felt they belonged to a community on their site.

“My allotment is the only reason I leave my flat. If it were not for my plot I would vegetate indoors” Plot holders survey

Recommendations

Allotment provision for both the population as a whole and for vulnerable groups in particular should be regarded as an effective intervention for the prevention of ill health, and evidence of the health benefits cited in the allotment plot holder's survey should be incorporated into the city's Joint Strategic Needs Assessment and decision making about public health.

More work should be done to unpick the findings of the survey that plot holders are in better health than the general population by comparing Health Counts data for certain population groups to the survey data.

Work should be undertaken on the Social Return on Investment of the allotment service for the city looking at if participation by certain groups can lead to savings in health / social care costs.

As part of the equalities impact assessment, access to the service should be reviewed to ensure that those who would most benefit can participate including communities at risk of poor physical and mental health

(see later) for example via community plots, fast tracking opportunities for certain groups (perhaps via GPs) or specific promotional work with certain communities. (see also [Allotment accessibility](#)).

Information about allotments should be included on the city's Information Prescription website and included in any future work on social prescribing.

Information from this work should be shared with the national Growing Health project (Sustain).

Role of allotments for biodiversity / sustainability

Allotments offer important spaces for small-scale food-growing, as spaces for people to take healthy exercise and relax but they also provide potential havens for local wildlife. In the city they are an important part of the green networks that provide an important role in management of bio-diversity¹²

Brighton & Hove along with neighbouring local authorities and other partners from the not for profit and private sectors is applying to UNESCO for Biosphere Reserve status and the recommendations in this strategy with regards to allotments overlap with the Biosphere management plan¹³.

The Biosphere management plan recommends that allotment sites are encouraged to be more wildlife friendly by incorporating nature areas / elements as well as working with plot holders on practices around water management and minimising the use of chemicals.

¹² Green networks are the interlinked green spaces in the city that connect the urban and countryside areas. http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Green_Network_for_Brighton_Hove_final_report.pdf

¹³ www.biospherehere.org.uk p83 for section on allotments.

This allotment strategy recognises that more can be done to incorporate nature areas especially around the edges of sites, within hedgerows or in communally managed areas. Plots themselves need to be managed within the cultivation rules, although as is covered in the section on rules and fairness there is a need for a greater clarity (and possibly training for those doing inspections) over the difference between problem pernicious weeds and companion planting, green manures and fallow land (all elements of an organic approach that would also support wildlife).

There is already good practice on sites. The survey showed that of the 771 people who responded to the question about environmentally friendly practices

- 83% grow food with a minimum of chemicals and 74% grow organically
- 94% make their own compost
- 78% plant flowers to attract pollinators

As is well documented, work to protect bee populations from decline is an important element of food production and alongside planting to support pollinators bee keeping is allowed on allotment sites (with a permit) and this will remain.

With regards to water management there could be improvements

- 65% of people said they collect rainwater
- 56% of people said they garden in ways that reduce water use
- Information gathered during the strategy process suggests that there are problems with leaking pipes on certain sites

With the allotment service water bill coming to £25,000 a year and Brighton & Hove being identified by national government as an area of 'serious water stress' this is a key area for action.

Recommendations

Encourage plot holders to minimize the use of chemicals / grow organically including signposting to training and information on this subject especially for new plot holders.

Promote opportunities for people on the waiting list to learn about organic growing for example at BHOGG and the Whitehawk Community Food Project.

Provide information and training around gardening in ways that minimise water use and encourage rain water harvesting.

Work to identify sites where the worst problems are for water leakage in order that any maintenance work can be prioritised.

Link in with experts e.g. Sussex Wildlife Trust / RSPB to look at managing habitats on the edges of sites for the benefit of wildlife.

Continue to permit bee keeping on site (with a permit).

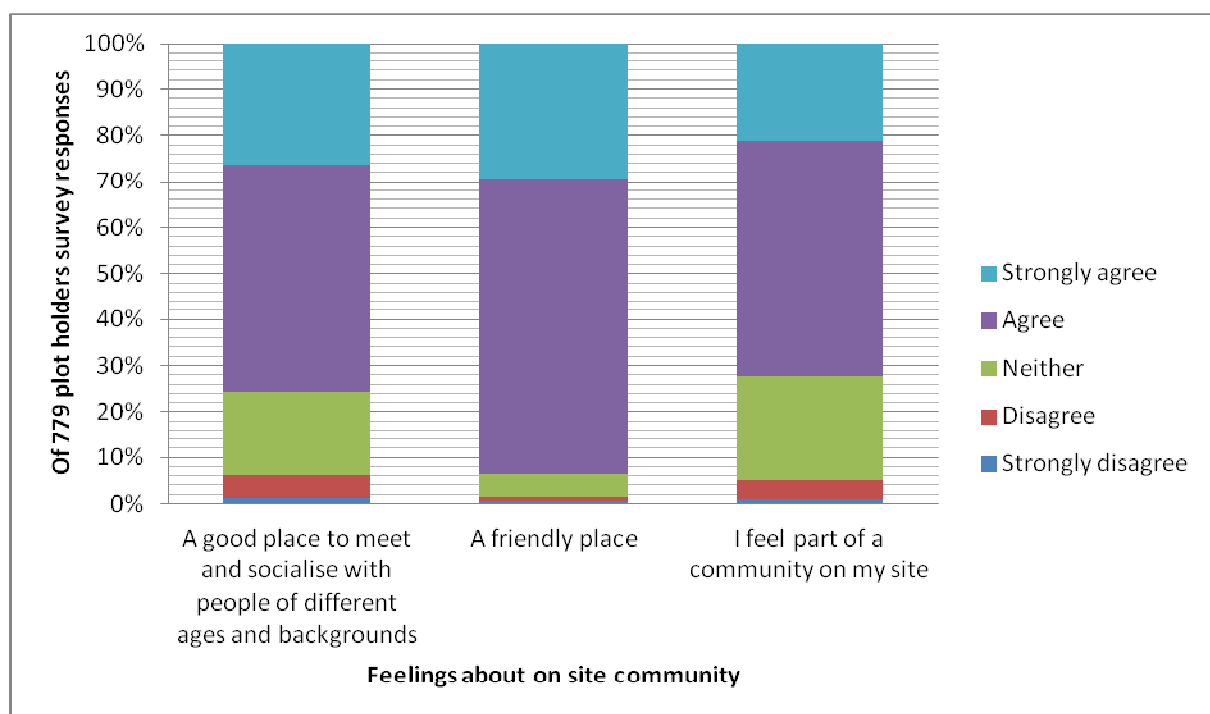
If the Biosphere application is successful there is scope to work further with allotment holders on conservation initiatives, such as recording wildlife, supporting surveys, analysing records, encouraging plants for pollinators and voluntary restrictions on harmful chemical use and to have greater integration of work on bio-diversity and allotments with other green-spaces as part of Brighton & Hove's Green Network.

The Allotment Community

Allotmenters come from a wide variety of ages, backgrounds and parts of the city however through a shared interest in food growing everyone involved in allotments is part of a wider community. At a citywide level the Allotment Federation provides the forum for this community to come together communicating via the website, newsletter and Annual General Meeting.

Although people are part of a city-wide group most people experience the benefits and challenges of being part of a community at a site level.

The survey asked plot holders a number of questions about the sense of community on allotments



From the plot holders survey it can be seen that one quarter of allotmenters work their plot alone, 22% of people are or have a co-worker, and 20% bring children to their plot.

The process of developing the strategy identified that the people on the waiting list wanted more opportunities to get involved in allotments whilst they are waiting.

People on the waiting list are stakeholders in the allotment community and there was

feedback that they were pleased that their voice was being heard in the development of the strategy (both at the consultation event and in the survey responses). .

Practically there was interest in getting involved / learning about growing including 415 people being interested in training if it was free and 266 people being willing to pay a small amount to cover costs. The most popular suggestion was inclusion in open days where they could meet other allotmenters and see what is involved (381 people wanted to do this). Open days would also be a chance to find out about co-working options. Opportunities to get together on an informal basis (eg picnics / juicing sessions / seed swaps) were felt to be a good idea by Site Reps at the focus group, and participants at the consultation event.

Co-working

Tenants can share cultivation by registering a co-worker on their plot – they are issued keys but have no legal tenancy right and are not responsible for the rent. Co-working is a good option when people can't manage a plot alone or who want to grow with friends; and is a great way of learning how to grow on an allotment if an inexperienced grower co-works with a more experienced person. Getting a Co-worker can be a way for someone who is struggling to cope with their plot to keep growing. Co-workers can take over tenancies if the plot holder gives up but there are rules on how this is applied in order to prevent queue jumping.

176 people from the waiting list survey said they would be interested in Co-working, 220 new growers from the plot holders survey said they would have been interested in for co-working but only 23 had been offered options for doing so.

Clearly Co-working provides a good opportunity for more people to get involved in growing and learning about allotmenting. The challenge is how to match people up and a suggestion is that site open days should be used to promote opportunities for both sides.

Pairing experienced growers with new growers

From the waiting list survey one third of people said that they would be interested in being put in contact with with a more experienced grower when they neared the top of the list, so they had someone to go to for information and advice. 385 people from

the plot holders survey agreed or strongly agreed that as a new grower they would have appreciated the support of someone more experienced.

398 people from the plot holders' survey agreed or strongly agreed that they would be willing to support new growers. Whilst there is work to be done on how this might be arranged the consultation event group that considered this idea felt that simple was best – for example a flag that could be put out on a plot saying 'happy to help' when someone was willing to have questions asked; or a list of plot numbers of experienced growers willing to help on a communal notice board.

New plot holders giving up within the first year is a problem that needs to be addressed (as identified elsewhere in this document) so the strategy recommends that finding ways to match those that want to help with those needing help should be explored to address this. Additionally having a more experienced 'friendly face' will help with other problems that new plot holders reported such as knowing where to get seeds, compost manure etc and help with welcoming new people to the site. This would also reduce the expectation on the Site Rep that they should be supporting new plot holders along with everything else they are asked to do.

Site Associations

Site Associations (used interchangeably with 'Allotment Societies') are official groups that bring together the allotment community on a voluntary basis. They may oversee the smooth running of an allotment site, undertake minor repairs, offer members opportunities to buy seeds or compost at a discount and represent the views of its members to others. A Site Association can also provide a point of focus to help create community spirit. There are currently 7 site associations. Site Associations can join the national society which gives access to legal advice and wholesale supplies. They can also apply for funding for on site activity.

Where Site Associations exist, awareness varied from site to site (from 40-70% of survey respondents on sites where there was an association) suggesting that there is scope to do some promotion to help improve awareness. However, of the people who do know them, around 75% are involved in some way, suggesting people tend to get drawn in to Site Associations once they find out about them.

Amongst those who were aware of but not involved in their Site Association, the major factor was lack of time (cited by 71 people out of 194 responses to this question).

Other reasons included being new to allotments (so not thinking they had anything to offer yet); not being able to find out about what is happening and not knowing how they might contribute. The survey also suggested that a number of people would be interested in getting involved with volunteering, events or activities at their site, but not with being part of a committee. It seems therefore that good information and giving people a range of ways to get involved is important.

Site Associations are highly valued. Positive responses particularly related to provision of shops – which were seen as a real community asset; and friendliness/ community spirit. But a few people said that they weren't involved because of perceptions around cliques/ unfriendliness.

Site associations are seen as a key way of delivering on many of the ambitions set out in this strategy by those involved in the strategy working group. Their establishment where they don't exist was supported by more than 50% of the survey respondents (only 7% were against the idea the remainder were not sure)

There were significant differences in both awareness of and attitudes to site associations between the different sites. See [Appendix 4: Governance: More on Site Reps & Associations](#) for detailed information. Encouraging, strengthening and improving the numbers and diversity of people involved in site associations is a recommendation of this strategy.

Community engagement where there is no on site association

One of the objectives of this strategy is to foster a greater sense of community engagement and participation, and on sites where there is no association the question of who should lead this activity has come up.

Alongside encouraging sites to set up associations, this strategy recommends that information about other community activity – site clears ups / open days etc that can be organised should be shared via the Federation website to inspire others. Feedback from the consultation event and conversations with the Allotment Officer

suggested that having a hub point was important – even if to begin with this is just a well used notice board.

Allotmenters reported that they wanted ways to swap tools, sheds and other equipment. Different activities may need to take place to develop a sense of community depending on the size of the site. For example on the smaller sites allotmenters reported that they may not even see other plot holders, so having occasional on site events might be a first step so that people can begin to talk about on site participation. Larger sites with communal facilities may already have a place that this coming together happens.

Site security and feeling safe and on site problems

Although most people were very positive about their allotment experience there were problems. Theft / damage or vandalism had been experienced by one third of respondents to the survey. 51 people said they have felt unsafe or vulnerable in the last three years which although a fairly small number in percentage terms is obviously significant at an individual level. 125 people reported that dogs fouling plots was a problem.

It was agreed that site security is important but that sites need to feel welcoming. The most popular suggestion was (subject to funding) to improve fencing. Fixing faulty locks was also a priority. The planting of 'spiky' hedges around fencing is also happening as part of the Allotment Watch scheme at some sites and if successful could be replicated elsewhere.

Having a strong sense of community and a well used site was felt to be important; as was clear information about how to report problems. Tips on security e.g. marking tools are already shared via BHAF and this should continue.

The most common problem reported by plot holders was the spreading of weeds from empty or badly managed plots, but cars blocking access paths and people 'hogging' water taps were problems at certain sites. Where there is site specific feedback this will be shared with Site Reps / Allotment Officer to see what can be done.

Recommendations

Improvements should be made to the new plot holder's pack to provide more information to help people when they get started.

Ways to involve the waiting list including Co-working, training and open days should be established.

Opportunities for new growers to be supported by more experienced growers should be established.

Site Societies and Associations are popular with the allotment community; provide accountability; and relieve the pressure on Site Reps. Therefore where there are no such associations they should be encouraged, however this is practical (e.g. smaller sites may choose to affiliate to pre-existing societies).

Different sites should learn from each other about ways to develop a sense of onsite community for example sites that organise open days / seedling swaps etc could share information with other sites about what is involved

All sites should have an information hub. Where there is no onsite notice board these should be installed (funding will be required).

Given that security is an ongoing issue the Federation should continue to work on the Allotment Watch programme and make links to the community police teams.

Information on being safe should be included in the new plot holder's pack and on BHAF's website.

Community plots

There are 30 community plots on allotment sites across the city (For a list see [Appendix 1: Consultation for the Allotment Strategy](#)). They can be independent groups, operate on a membership basis or be part of larger charities.

Some community plots have input from a paid member of staff (either on an ongoing or sessional basis) but most are volunteer led. Community plots can be open to the public or for use on a referral basis for specific client groups e.g. adults with learning disabilities, families from a deprived neighbourhood, people who have experienced homelessness or addiction.

Nearly all of the community plots operate by having regular open days where people come together to work on the plot.

Community plots are a crucial part of ensuring that allotments are accessible for vulnerable residents as they offer a supported opportunity to take part in growing without having to commit to a plot of your own. Whilst some people involved in community plots will go on to apply for their own plot many report that the comradeship that a community plot offers is what appeals to them.

Community plots vary widely in size most have one full plot although there are also much larger well established projects including BHOGG, Moulsecoomb Forest Garden and Whitehawk Community Food Project. Most of the community plots are happy with the size of their plot however 2 (on single plots) have said that they would be interested in more land.

All of the community plots can access information and support from the Food Partnership's Harvest project that works with growing projects across the city. They can also use Harvest's volunteer signposting service. In the past Harvest staff have acted as an intermediary between the Council and community groups when there have been complaints; and helped community groups to apply for plots.

As well as an online-survey of community plots undertaken as part of this strategy development, during 2013 the Brighton & Hove Food Partnership undertook an evaluation of the Harvest project including research with these and other growing projects. Volunteers on projects reported various benefits of involvement including access to health food, mental wellbeing, skills development and social interaction.

Community plots said they need ongoing support with accessing small grants and free equipment and materials. Many said they need training for volunteers on various topics for example supporting vulnerable people, first aid and risk assessments in outdoor space. They also said they appreciate the opportunity to network with others

doing similar work. These activities are currently offered by the Harvest project which the Food Partnership is applying for funding to continue. The Food Partnership is also applying for funding to offer training for volunteers on food projects on supporting people with complex needs and to expand the current volunteer signposting service.

Many of the open access community projects say they need more volunteers on both an ongoing basis and for one off jobs. 167 people from the waiting list survey said that they would be interested in opportunities to volunteer on community plots and whilst 56% of new plot holders (n=470) from the plot holders survey said they would have liked to know about growing on a community plot, only 5% said they had been told about opportunities.

The Allotment team at the Council raised a number of issues about the way that community plots are managed including lack of consistency or clarity around rules, charging and complaints. During the consultation period Council staff, community plots and Site Reps all suggested that an amended set of rules for community plots should be considered.

Recommendations

Community plots that are open to the public provide an opportunity for people on the waiting list to learn about growing and opportunities to get involved should be promoted. The process of joining the waiting list should allow for an option where people give permission for their details to be shared so that they can be kept informed about open days / options for co-working / volunteer opportunities on community plot and training.

That separate rules for community plots should be considered.

Where a community group is mainly working with a group of people that would be eligible for a concession and/or the community group furthers the aims of this strategy they should be able to apply for the 25% discount.

The Food Partnership and the Allotments team at the Council should work together on a procedure for applications from community plots. This will

include processes for applying for a community plot that can be published on the website and a setting out of criteria that defines who can apply for a community plot.

This strategy recommends that applications from community groups in areas of the city where there aren't community plots and/or with communities of interest that are under-represented should be fast-tracked. The procedure for community plot applications including when groups should be fast-tracked should come to the Liaison Group for agreement.

Allotment Accessibility

Demographic information

Plot holders are 45% male and 53% female (2% not known or not applicable). The male / female ratio has changed in the last few years as previously more men than women were plot holders.

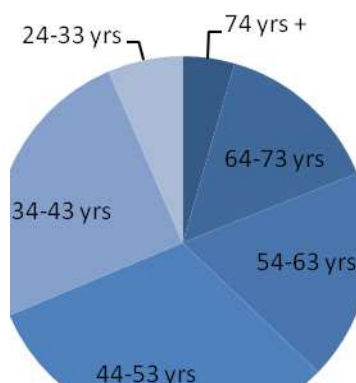


Chart – Total age data for 2216 plot holders based on BHCC data Sept 2013. There is no age data for 498 plot holders).

Age of allotmenters

As can be seen the majority of allotmenters are 44 –63 yrs old (49%). A significant number are over 64 (18.5%). In considering the benefits of allotments the survey results show a slight trend in mental health / stress relief seen as beneficial for younger groups, they also tend to see growing food with low environmental impact as a benefit. General exercise, socialising and saving money on food bills is relatively similar across age groups. The older age groups especially agree that having an allotment is important in their overall health and happiness.

Ethnicity and disability information for allotmenters

Demographic information held about allotmenters by the Council is not complete, for example for the ethnicity data 77% of the information is 'blank'. This may be because people chose not to share this information or because they have had a plot along time when this information wasn't routinely asked for. Demographic information is collected when people join the waiting list not when they are given a plot.

Of the 714 people who answered the demographic questions on the survey 624 were White British (87%) and for the 620 plot holders for whom the Council does hold ethnicity data 89% are White British. Census data for 2011 shows that 80.5% of the population of Brighton & Hove list their ethnicity as White British. This indicates that BME / Other White people on allotments are probably under-represented although the lack of data makes this a little unclear.

Information held by the Council on disability only relates to people who claim a concession on the basis of being registered disabled so this does not provide an accurate picture of the total number of allotmenters who have a disability.

Of the 712 plot holder survey respondents who answered this question 67 said they had a disability (9.4%). Census data for 2011 shows that 16.3% of residents consider that their day to day activities are limited because of a long term health problem or disability.

As has been seen earlier in the document (Benefits of Allotments) people with disabilities saw great benefit in having an allotment across all of the seven benefits areas covered in the plot holders survey (access to healthy food, access to affordable food, socialising etc). People with a disability in the plot holders' survey provided a lower score for their overall health – 50% rated it as fair or poor relative to 4.1% of those not having a disability however disabled people saw an allotment as very significant in their overall health and happiness. For disabled people, 85% showed this extent by rating it as between 8 and 10 out of 10, compared to 72% of people without a disability.

Waiting list

We are using demographic information from the waiting list survey because this is based on people who have confirmed they wish to stay on the waiting list. The Council collect demographic information when people join the waiting list but because of the clean up exercise it was felt that the waiting list data from the survey provided a more accurate picture.

The survey indicates (n=714 respondents who answered this question)

- 54% of those on the waiting list are female.
- 79% are White British (as mentioned above the figure from the 2011 census is 80.5% White British).
- 7% say they have a disability (figures from the 2011 census are that 16.3% of residents have a disability)
- A relatively high proportion (43%) have a household income of less than £15,000 a year. The majority group was full-time employed (37%) although there were notable proportions of part-time employed (17%), unemployed (11%) and retired (10%).

Plots adapted for mobility needs

There are 18 limited mobility plots that have been adapted to include raised beds and easy access paths. These are available at Foredown, Coldean and Weald. As well as adapted plots there are also plots that are easy access. That is to say that they are near parking, have flat paths to reach the plot, and in some cases have nearby toilet facilities.

28 people from the plot holders survey said they had a plot that the Council had adapted for accessibility and 19 people had made their own adaptations (e.g. wider / flat paths, raised beds).

83 people who completed the waiting list survey said they would be interested in a plot that had been adapted for mobility needs. Most people interested in a plot adapted for limited mobility were between the ages of 30 and 49 (56%) with only 13% of those interested aged 60 or above.

“My small raised plot for people with disabilities has made it possible for me to have a vegetable growing experience. I couldn’t have had an allotment otherwise”

Quote from consultation event

The Site Reps focus group raised a concern that the specially adapted limited mobility plots are not being used to their full capacity with there being empty plots. The feedback was that this may be because people who may be interested in a limited mobility plot are not aware of how to apply for one.

Promotion and fast-tracking

Currently little outreach is done to promote allotments to specific groups of residents. There is good information about accessible allotment plots on the Allotment Federation’s website and information about community plots on the Food Partnership’s website. The allotment page on the Council’s website includes information about concessions. The Food Partnership also signpost volunteers to community projects and offer one to one appointments for adults with additional support needs (e.g. mental health, learning disabilities or history of addiction) to help them to access community growing project including those on allotments.

At the consultation event one of the themes discussed was about promoting allotments to priority groups and investigating ways to fast-track applications for people who may benefit most from involvement. Whilst there was agreement that these ideas warranted further work it was also felt that there should be good provision for everyone who wants to take part (because as the survey work has shown many people derive benefits from being an allotmentee). There was concern that any work on prioritising might leave out groups such as single working people on a low income; or people with undiagnosed mental health issues.

Concessions

A 25% discount is applicable for the following groups – people over 60, residents in receipt of benefits and students. This discount aims to enable people who may most benefit from allotment growing but are not able to afford the full rent to participate.

People apply for the discount so some people who are eligible and yet can afford the full rent may choose not to claim the 25% discount.

The cost of this concession can be seen as the difference in income that the plot would bring in if it were rented out at the full price.

Using 2013 data

373 plot holders claim a discount on a half plot (£8.90) = £3320

69 plot holders claim a discount on a 125 – 250m² plot (£8.90 for ease of calculation) = £614

326 claim a discount on a full plot or bigger (£17.85) = £5819

Total = £9753

Of this over 60s account for

275 plot holders @ £8.90 = £2447

295 plot holders @ £17.85 = £5265

Total = £7712

Recommendations

People joining the waiting list and being given a plot should be encouraged to complete demographic information. Demographic information from the waiting list should be reviewed every two years and information from this used to inform targeting of promotional work amongst any communities of interest that are under-represented.

Engagement with agencies that represent Communities of Interest (e.g. Federation for Independent Living, BMECP, SpeakOut, Age UK Brighton and MIND) should be undertaken to understand how to address barriers to access by certain groups and to explore opportunities to promote allotments (including community plots) to the groups they represent. Targeted promotion should focus on sites where the wait is shorter. This should include information about the expectation of the length of wait to help people plan. For example older people may choose to join a waiting list in advance of retiring.

With 1 in 20 people in Brighton & Hove having a disability¹⁴ (and strong evidence of the benefits of allotments for people with disabilities) more should be done to promote allotments to them via disability support organisations. This should include detailed information about the options – easy access, limited mobility, co-working and community plots. Site Reps and the Allotment Officer to monitor the demand for limited mobility and easy access plots. Limited mobility plots at all sites should be promoted to people on the waiting list who have indicated that they are interested in a limited mobility plot (rather than just the site they are waiting for).

The 25% discount that is applicable for people over 60, residents in receipt of benefits and students should remain in order to enable people who may most benefit from allotment growing but are not be able to afford the full rent to participate. The availability of concessions and how and when they can be applied for should be advertised clearly both to people on or interested in

¹⁴ For more than one in twenty residents (20,445 people, 7.5%) their day to day activities are 'limited a lot' due to a long term health problem or disability. For a further 24,124 residents (8.8%) their day to day activity is limited a little (BHLIS, 2011 Census Briefing)

joining the waiting list and to current plot holders (as their circumstances may change). Community plots that work mainly with groups that would receive a concession should be eligible to apply for a concession.

Opportunities for Site Reps to take part in training about accessibility issues (including for example understanding mental health or physical access) could be provided. These courses are often run by the voluntary and community sector and Site Reps could be signposted to them or they could be run for Site Reps as part of an ongoing programme of training. Some courses may be free for others there may be a small charge for which funding would need to be found.

A sub group of the Allotment Liaison Group to include other interested organisations / experts should be set up to look at the issue of fast-tracking applications for priority groups of people perhaps via a GP referral. Any proposal should consider fairness in relation to the criteria used – for example the prioritising of people in receipt of certain welfare benefits would leave out single working people on a low income; or people with undiagnosed mental health issues. Any criteria / process used should be unambiguous and transparent; not reliant on the individual discretion of officers or site representatives.

The plot holders survey has shown that older people rate their allotment highly in terms of health and happiness. With the healthy ageing agenda an important area of work for the city and nationally, opportunities to consider how funding could be attracted to support the concessions for older people could be explored. The Council is currently working towards becoming a more Age Friendly City including a submission to the Big Lottery fund for a citywide project on healthy ageing. Findings from this strategy work should be fed back to Age UK Brighton who are leading on this work.

Not all sites have access to a toilet which prevents people from participating. Where sites don't have toilets (or there aren't nearby public toilets) funds should be sought to install and maintain them.

People with mental health issues and physical disabilities may need additional support to take part in allotment growing (although they may want their own plot rather than being part of a community group). Individual or micro beds may be appealing for people with disabilities because of the more manageable size. The development of this proposal should consider this.

The Governance: How Allotments are managed section includes reference to work to make the governance structures of allotments more representative of the demographics of plot holders.

Governance: How allotments are managed

Allotments are currently run in a complex partnership between the City Council, who deal with much of the administration and some of the maintenance; and plots holders themselves who may volunteer as site representatives; be involved with an association; or simply do things for others and/or themselves. The culture of 'self-help' in allotments is a huge and valued asset and this strategy aims to acknowledge and build on this basis.

The City Council

The current council allotment service includes an Allotments Officer, Administrator, and maintenance staff. There are also other council teams which contribute staffing, including middle and senior managers and the Environment Department Contact Centre. Finance staff oversee billing and payments including collecting arrears.

Allotments Officer

The Allotments Officer oversees maintenance of the sites, lettings, waiting lists, and rule enforcement including termination of lettings on top of other duties. Various stakeholders noted that this job was 'huge'. This strategy acknowledges the pressures and that currently there are no resources to increase staffing levels, so there are recommendations on efficiency (see also [Appendix 6: Additional information on Resources and Finance](#)) which could help free up officer time.

Brighton & Hove Allotment Federation (BHAF)

Brighton & Hove Allotment Federation is an independent city wide organisation, run by allotment holders, to promote allotments and to represent the allotment community's' interests. All plot holders and registered co-workers in the city are members of the Federation. The Federation has a steering committee made up of volunteers elected from its membership, and is accountable to members via its annual general meeting.

For more detail see their constitution at www.bhaf.org.uk

Allotment Associations and Societies

As well as the activities outlined in the Allotment Community section Site Associations also play a key role in governance. All sites, whether or not they have an association, may nominate a contact to attend committee meetings of the Federation. But any properly formed association can elect a representative to attend Federation committee meetings and vote on the issues addressed. Where Associations exist they are also able to work alongside the Site Reps and provide an additional mechanism for communicating with allotmenters.

Volunteer roles on sites

This strategy acknowledges the huge amount that volunteers contribute to allotment sites, both formally (e.g. by helping with site shops or associations or as Site Reps) or informally, for example by advising and supporting other plot holders.

Site representatives (or Site Reps) are all volunteers. They issue keys, resolve difficulties and often undertake additional work on top, such as minor maintenance. They can claim expenses and free rental on an allotment (half or full plot). There is currently no standard mechanism for either appointment or dismissal, although at some sites including Moulsecoomb, The Weald, Lower Roedale & Roedale Valley, they are elected at the site association's AGM. These are referred to in this strategy as 'elected Site Reps'. Otherwise they are recruited by the Council's Allotment Officer. These are referred to as 'appointed Site Reps'.

Site Reps play an important role in running the lettings process (see the waiting list section) and liaising with new plot holders. They act as a point of contact for and as a representative of plot holders to the City Council. Conversely their role sometimes means enforcing rules on behalf of the City Council, such as carrying out inspections for weed notices. Sometimes this dual role causes tension, with some Site Reps feeling "caught between 'plot holders who moan' and 'the Council who do nothing'; and some Site Reps felt that there was confusion over the nature of their role, particularly a lack of clear understanding and expectations among plot holders which could cause frustration on both sides.

Whilst the contribution of Site Reps is greatly valued, in the past there have also been misunderstandings in the role that Site Reps play in communicating with the allotment community and sharing the views of plot holders with the Council. There has also been criticism that they do not 'represent' anyone as a majority are not elected. Ensuring representation by election is therefore a key aim of this strategy and there is a commitment to this being in place within the first five years of the strategy.

Concern has been raised by current Site Reps, the allotment community and the Council that Site Reps are already asked to do a lot. The suggestion that new allotmenters are 'mentored' by more experienced plot holders and that over time more maintenance of sites is done by volunteers introduces further roles for volunteers on a site.

All volunteers require a clear understanding of their role, clarity on who they are volunteering for, an understanding of how they apply for or are elected to become that volunteer, access to training and support and clarity on how long they have committed to the role for.

Strengthening and clarifying the role of Site Rep

Clarification of the role, and drawing a clear role description for Site Reps (and any other volunteer roles) is as a vital first step. It was suggested by Site Reps that greater clarity about expectations might encourage more volunteers to come forward.

In general smaller sites are easier for Site Reps to deal with practically and Site Reps identified that larger sites require more site representatives in order that the task is not overwhelming. This is generally the case in practice but isn't made explicit.

Site Reps felt that a good rapport with Council Officer is vital, and stressed the importance of a relationship based on mutual trust. Where this doesn't work well (e.g. if communication is poor; or if the council officer does not back up site rep recommendations e.g. on rule enforcement) Site Reps can feel undermined. However it was acknowledged that it would be very difficult for a single officer to have an effective working relationship across all sites simultaneously.

The survey showed that in general Site Reps are highly valued by the allotment community, with more than 65% of them finding their Site Reps easy to contact and helpful. They were particularly valued in providing advice and guidance; and this was the part of the role seen as most rewarding by many site representatives.

There was however some patchiness between different sites with some sites finding their Site Reps more helpful than others. There was some concern that the range of Site Reps did not currently reflect fully the diversity of allotment holders, and recommendations to strengthen the accountability of site representatives (including elections) may also help to address this.

Site Reps identified the need better support, e.g. reintroducing induction and training programmes which had been successful in the past, particularly when led by experienced Site Reps; this was echoed by plot holders in the survey.

Site Reps also identified that they would like to share good practice better with each other. For example at the Site Reps focus group (which took place as part of the strategy consultation) they discussed the lettings process, which was carried out very differently reflecting the needs of different sites. One Site Rep subsequently decided to carry out plot lettings differently as a result.

Site Reps therefore requested that similar small group discussions could take place in future. They felt that it was important to create an environment to discuss issues and share good practice from the practical (shared ordering of seeds, materials and equipment) through to governance issues such as the revision and interpretation of rules.

Liaison Group

These are meetings between the BHAF committee and staff from the BHCC Allotments Service to discuss what is happening within the allotments service and raise issues of importance to allotment tenants. Whilst a small group is valuable as a means for discussing and testing out ideas, this strategy recommends that the membership and purpose of this group is made more transparent, with terms of

reference agreed, Also that the group should take an overview of implementing this strategy and ensuring progress stays on track.

Recommendations

A great deal of detail went into these recommendations - for fuller information please see [Appendix 5: Recommendations on the role of Site Reps – further detail](#)

A revised structure which has participation by the allotment community at its heart should be implemented. This will need further discussion and review, particularly in evaluating how the new Allotment forum works out, as this will be fulfilling a dual role i.e. acting as a space for Site Reps to meet and share information and decide policy, such as reviewing the allotment rules; but also as a place to engage with wider stakeholders.

Site Associations should be encouraged to make formal links with the Allotment Federation, ensuring the Federation's accountability

Encouraging strengthening and improving the numbers and diversity of people involved in site associations is a recommendation of this strategy; alongside improving opportunities for people to volunteer in other ways All Site Representatives should be elected, and this should take place within the first five years of implementing this strategy. In the meantime a transparent appointment mechanism should be agreed as an interim measure for when Site Reps are directly appointed.

The role should be clarified, supported and strengthened. Transparent processes for dismissal and complaints should be agreed, along with clear role descriptions. Better training and support – especially chances for reps to share learning with each other - should be available

Greater diversity should be encouraged and barriers to this identified and addressed

The role of Site Reps should be reviewed in three years to assess whether further changes need to happen eg split into two or more roles

Time savings which allow the Allotment Officer more time to prioritise relationships with and support to site representatives should be explored. (see also [Resources and Finance](#) Section).

A new City Allotment Forum organized by BHAF will replace the current Site Reps meeting and meet three times a year. It will provide a platform for Site Reps to engage with each other and the city council, and be a working forum to take forward issues on allotment running and agree new rules and policies. It will be outward facing, seeking engage with and gather the views of other stakeholders for example from public health, the CCG (Clinical Commissioning Group) the police, voluntary and community groups “ and possibly some representation from people on the Waiting List. How effectively this dual role works should be reviewed as it developed; for example it might be necessary to target one or more meetings per year for wider stakeholder involvement; and keep the remainder focused around Site Reps.

Both the Allotment Forum and the Allotment Liaison group will put together smaller working groups to take forward specific actions or research which will be reported back to them.

The Allotment Liaison group will oversee implementation of the allotment strategy and track progress.

During the first year of strategy implementation, Liaison group membership should be based on the current allotment strategy group to ensure continuity and forward progress on the strategy action plan

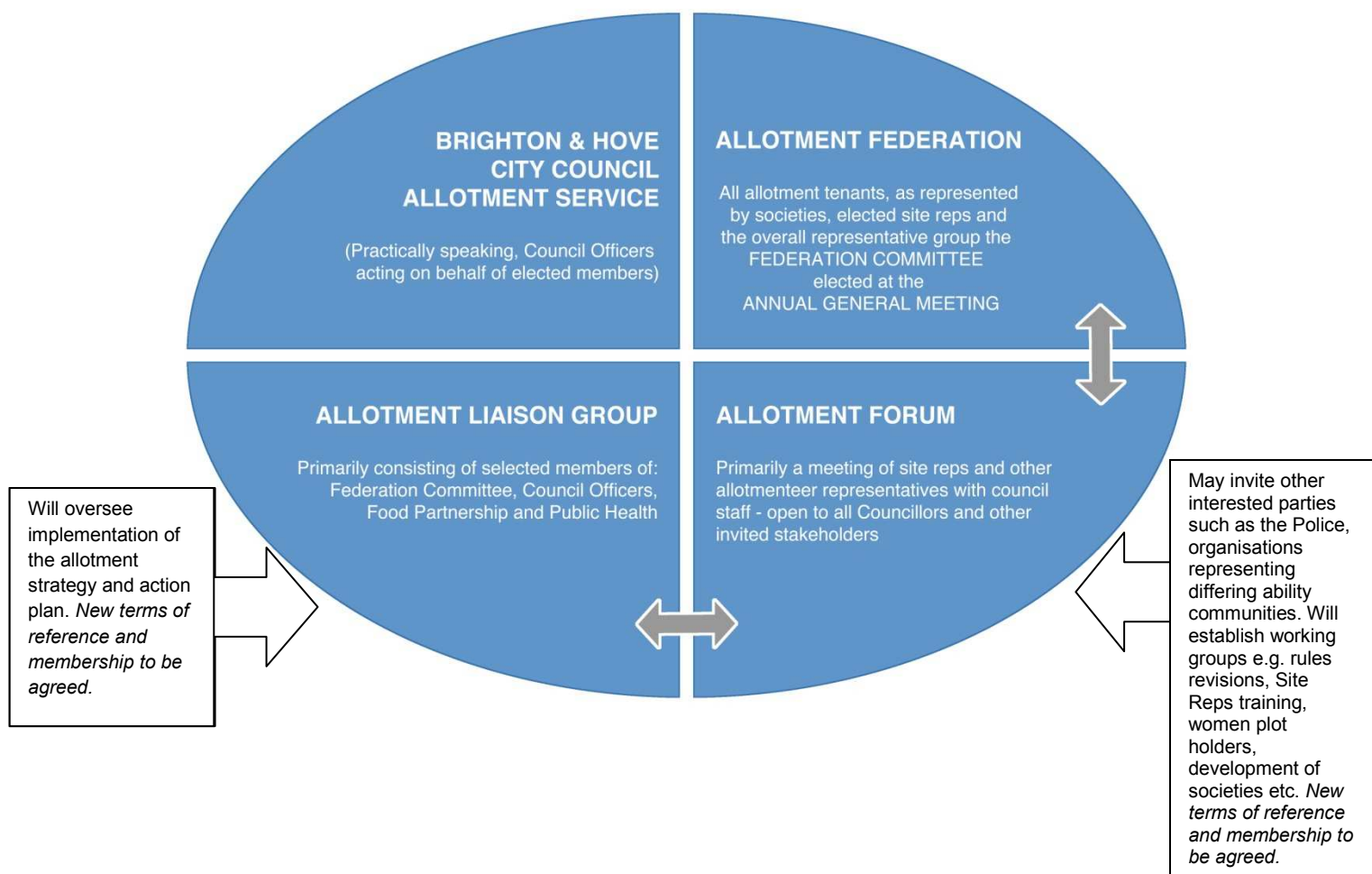
The liaison group should during this time develop clear and transparent terms of reference, and revise membership for a refreshed group taking over from year 2. Terms of reference should be subject to regular review.

The relationship and the reporting arrangements between the Allotment Forum and the Liaison group should be clarified.

Brighton & Hove Allotment Federation (BHAF) is already revising its structures and constitution parallel with this strategy. BHAFs aims and objectives, along with its partially revised constitution, form an appendix to this are at www.bhaf.org.uk. This strategy recommends that BHAF should:

- Broaden its active membership and widen the participation in its decision making (e.g. its committee) to better reflect the diversity of allotmenters and therefore improve its accountability.
- Promote the interests of its members whilst at the same time developing space to share ideas and best practice, including organizing the new Allotment Forum

Diagram to show revised structure for governance and communications



Participation and self-management

The involvement of the allotment community in managing allotment services is a key principle of this strategy. Increased participation by plot holders and people on the waiting list was seen as positive amongst all stakeholders; can be rewarding for individuals; could possibly save money; and leads to better run, more inclusive sites.

There was also recognition that participation has a cost in terms of time and energy, and expectations about what individuals contribute must be realistic. This strategy acknowledges that many people already contribute a huge amount helping with site shops; local associations or as Site Reps. There were concerns about 'burnout' if too much is expected of too few volunteers.

Core to this strategy is the idea that greater devolved management should be 'tested' in a range of different ways, to see what works. There will never be a one size fits all solution, and different approaches may suit different sites and the individuals involved with them.

Firstly, this strategy recommends that allotment associations and plot holder representation should be encouraged and strengthened.

Another step might be an association taking on small areas of site management, as many are doing already, as there is the potential to offer a more responsive and efficient service for less money than if this is provided by the Council. For example on some plots currently a site association volunteer will replace a broken padlock with a new one supplied by the council. This is cheaper than using the council's maintenance staff, so saves money to be spent on other things to benefit the site.

A further step would be to pilot 'self-management' as happens on some allotment sites in other parts of the country. This would mean that the budget and responsibility for running the site would be passed to an association or similar body on the site. Some advantages of self-management could be that those best placed to understand the needs of the allotment community are in charge of organising the service; that community spirit could be developed; and that the service could offer a better service for less money.

The disadvantages could be that there is unequal buy-in, i.e. that some allotmenters won't get involved and too great a burden will fall to too few; that

service provision could become uneven across different sites, as each one develops locally according to different priorities. This could also mean a loss of strategic oversight of the service as a whole.

It is also possible that advantages of economies of scale would be lost i.e there may be some things that are best provided on a city wide basis. Concern has been raised about issues like billing; collecting payments; and managing waiting lists for sites, as there is an argument that this needs an effective central ICT system.

As this is a new approach for the city it is hoped that more than one site will be willing to try taking on small areas of site management approach, to learn what works in different settings; and find out whether this approach will work for other (or even all) sites; and if so what would need to remain centralised to be effective.

Whilst participation is not – and should never be – purely about saving money, it could help. There are further thoughts on different levels of participation, and ultimately self management in Resources and Finance.

Recommendations

Participation, and the involvement of the allotment community should become a key principle in allotment management and an increased and more diverse involvement should be encouraged at all levels.

Opportunities for people who want to volunteer (not just by joining committees) should be established for example helping with open days, mentoring new allotmenters or taking part in routine maintenance (see [The Allotment Community and Environment](#))

Self-management should be explored, at a range of different levels and degrees, not just as a way of saving money but also of strengthening community involvement and participation. See also the recommendations in Resources and Finance.

Rules and Fairness

Allotmenters agree that there should be rules (only 7.8% of people in the survey of plot holders disagreed that there should be rules on how plots were used)

But the survey results and consultation events raised some concerns about allotment rules¹⁵ and their enforcement, for example the issuing of weed notices and non-cultivation notices. Common concerns were:

- Inconsistency both between sites and within sites in enforcing rules.
- A feeling that there are too many rules; some of which are out of date, unnecessary or not capable of being enforced.
- A lack of enforcement which leads to other issues, in particular a high number of uncultivated plots – this caused immense frustration for both plot holders and people on waiting list. (see also [Waiting Lists and Demand for Allotments](#))
- The need for clarity over the difference between weeds and wildlife areas - given that organic approaches to food growing can also involve companion planting, green manures, fallow land etc - and over specific issues such as ponds and polytunnels.

Community plots in their nature operate differently. (See Community Plots) There were suggestions that the rules should be adapted for community plots, and it was felt that the rules are in practice applied differently compared to individual plots in any case, which caused uncertainty and in a few cases resentment. It was also felt that security and health and safety implications when a plot is being worked communally needed more detailed work for the protection of those involved.

Recommendations

Rules should be clarified and streamlined – with an emphasis on overarching key principles but allowance for:

- a degree of site specific flexibility, as some rules are needed for some site but not for others
- different styles of growing

It should be clear which rules are enforced by the council, and which should be looked after by the Site Reps. There should be a hierarchy of rules

¹⁵ http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/allotments/allotment_rules_v3_Dec_2011.pdf

The Allotment Rules should be subject to a 3 year review led by the Allotment Forum (if necessary informed by a working group) to ensure that rules are up to date with current policy and that they are enforceable on a practical level. This process should involve site representatives as not only are they the front line in enforcement, but Site Reps are also aware of practicalities around how to support plot holders in complying with any rule change.

As full review could be costly and time-consuming (because the rules form part of a legal contract between the City Council and the Allotment Tenants) there should also be an annual process involving the council and Site Reps for identifying rules that need to be revised on an interim basis and a list of any interim changes kept for the next 3 year review.

To ensure that rules are both fair and enforceable there should be tests for new and existing rules. This needs further discussion but some rule tests could be:

- Does this rule protect the environment, other current tenants or future tenants from genuine risk of harm?
- Is this rule enforceable?
- Is the rule proportionate? I.e. the benefits from enforcing it outweigh both the effort involved and the consequences (e.g. distress to tenants)
- Is it clear who is responsible for enforcing this rule? (Site Reps or Council)
- Is the rule consistent with the objectives of this strategy?

Site representatives have the difficult task of applying many allotment rules. There should be a trial programme of “moderation” meetings, where group of representatives and contacts from different sites visit a site together to jointly look at how they enforce particular rules (e.g. giving out non-cultivation notices). This would help to develop consistency in the interpretation of these rules, and also offer support, particularly for newer Site Reps.

The rules should be adjusted to address the needs and issues of community plots and provide guidance on what the policies and practices community groups should have in place.

Waiting Lists and Demand for Allotments

Demand for allotments

Demand has varied widely over time and in the 1990s demand was so low that many plots fell into disrepair and sites were reduced or closed down altogether. However from 2000 there was a growing interest in allotments and a large waiting list developed.

In 2009, as a solution to relieve pressure from a large waiting list BHCC decided to offer only half plots to new tenants and to halve every full plot that became available for rent and rent it to two people. (See [Land, plot size and plot splitting](#))

The Council also extended the land available by providing new plots at Foredown (12 new half plots); and reclaimed disused plots at Whitehawk Hill (30 new half plots) and Craven Vale (70 new half plots). They are exploring the possibility of opening two further sites.

How big is the waiting list and who is on it?

As part of the strategy development, a survey of people on the waiting list was carried out. People on the waiting list were asked to confirm that they still wanted an allotment to better gauge the real size of the waiting list and at the same time to clean up the list so it would be a more effective tool for lettings.

Over 900 people completed the survey, of which 842 wanted to stay on the list. Since the survey has closed more people have confirmed that they wish to stay on this list giving us the anticipated figure of a waiting list of 1000. For more information on the survey see [Appendix 1: Consultation for the Allotment Strategy](#).

The number actually waiting for an allotment is believed to be around 1,000 which is approximately 1,000 less than previously thought, although this figure does not take into account latent demand for allotments i.e. the people who were did not join because the waiting list for that site was closed, or did not bother to apply because they were told they would have to wait several years.

The consultation identified that people on the waiting list are important but relatively unheard stakeholders in the allotment community. There was the same high level of response from those on the waiting list as from existing plot holders, to both the on-line survey and the consultation event.

How the waiting list works

The City Council manages allotment waiting lists. Each site has a separate waiting list. People can apply for just one site per person; or two sites per household, either on-line or via a paper form. The average wait for a plot is approximately 2 years, although this varies from site to site. In practice it generally ranges from 6 months to 4 years and people can wait up to 10 years in exceptional circumstances. There is particular demand for sites which are in a central location without many alternative sites nearby. There are also less popular sites with no waiting list. When there is spare capacity these plots are offered to people on waiting lists for nearby sites, however there isn't a systematic way of alerting people on all waiting lists to available capacity elsewhere,

In the 1990s, when demand was low, people could apply for more than one plot on sites which had spare capacity, so a few individuals now have multiple plots, - an anomaly when demand is high. Under current rules people can only apply for a maximum of one plot per household.

A waiting list is closed when it reaches the same number of people as there are plots on a site. Smallest sites are most likely to have a list which is closed.

The Council receives regular email and phone calls from people enquiring their position in the list, generating additional work. The current waiting list information is not linked to the Council website and people are not able to check their position on-line.

The City Council occasionally contacts people on waiting lists to ensure they are still interested; however with the current ICT system this is a time consuming exercise and not done systematically. These exercises are usually targeted at sites where people have been waiting the longest.

Issues identified through the consultation

The current waiting list database requires staff to manually re-enter data which has been provided on line, which does allow the allotment office to weed out some ineligible applications (e.g. people who are already on another waiting list or live outside the city). Any replacement system would need to do this task automatically. The letting process is reliant on site representatives who are all volunteers, and carry this duty out in different ways to suit their personal circumstances and their site. Site Representatives identified that when they are given a list of people at the top of the waiting list for their site, they can often only contact about a half of them i.e. many people on the waiting list no longer wanted plots or have moved away.

As well as making their job frustrating, this means that current data on waiting list size is inaccurate. Site representatives see improvements to the waiting list mechanism are a priority.

“The satisfaction of having let a plot to an enthusiastic gardener outweighs the disappointment of those who give up.” Site Reps focus group

Site Reps gave positive feedback on the lettings process when this went well but also identified problems which hindered the efficiency of the lettings process as well as causing them personal annoyance. It was frustrating for Site Reps when people didn't show up for viewings of vacant plots when these had been arranged.

Conversely was difficult for people on the waiting list if they were expected to go to viewings on a day they needed to be at work. Other issues they reported were resentment at plots being informally passed on (e.g. to friends) rather than to people on the waiting list, feelings of unfairness that some plot holders have more than one allotment when they are unable to access any; feeling it didn't make sense that they can only sign up for one site when there were several they could access, or simply hearing nothing for years. A number of newer plot holder also remarked that the only thing they heard after joining the list was when someone phoned up to offer them a plot.

A yearly update to check that you wanted to remain on the waiting list was considered to be a good idea by 96% of the 696 people on the waiting list that answered this question and 98% of them said they would also like to be kept informed of their position on the waiting list.

Above all, far too often plots were let to people who then quickly lost interest and didn't work them and the plots become overgrown. Once plots are overgrown they are harder to let and harder to cultivate; and spread weed seeds to other nearby allotments. This frustration was also one of the main ones individual plots holders and those on the waiting list smoothing the lettings process including good support for site representatives is seen as a priority and is referred to in various areas of this strategy.

“Why are there so many empty plots and so many people waiting for years?”

Waiting list survey

Site Reps stressed that it was important that lettings mechanisms if possible assess people's real understanding of and commitment to the regular work which will be involved in maintaining a plot.

Currently, there is no clear policy on what happens to their waiting list position if people refuse a plot they are offered (even if this several times) – 5% of those who answered the waiting list survey have turned down a plot in the past; or if they don't show up when they are invited to view vacant plots with a site representative. This wastes time for site representatives and slows down the process. Some possible solutions include

- They could be put back on the waiting list by 1-2 years
- A “3 strikes and you are out” rule i.e. 3 refusals means going to the bottom of the list.

However it should be noted that of the people who responded to the waiting list survey 90% (630 people) said ‘that if they were offered a plot tomorrow they would take it’.

Many on the waiting list are already allotment co-workers and others would be keen to explore this option. Co-working has been identified by site representatives and others as an excellent route into allotment ownership – building skills and ensuring that people are aware of the realistic time commitment needed for an allotment; and supporting existing plot holders to keep their plots in use and maintained.

Others are keen to be involved in the allotment community e.g. via events, going to site open days, training or mentoring whilst they wait. There are more recommendations on a greater role for people on the waiting list this in [the 'Allotment community'](#) section.

Recommendations

The work started under this strategy to clean up the waiting list should be completed with all people on the waiting list who have not responded via the online survey being contacted again, to make sure that they have had a fair chance to respond.

There should be a regular waiting list cleansing exercise. This would have to be manageable within current resources. Using the current ICT system this could be every 3 years, on a rolling basis i.e. with 1/3 of the site waiting lists cleansed each year.

Should additional resources be secured, there should be a new ICT system implemented which would streamline the waiting list management and allow people to check their position on-line. This could be part of a bigger change to ICT (see 'Finance' section) or as a stand-alone exercise, i.e. there could be a separate stand-alone system for managing the waiting list

There should be a process for keeping people informed of their waiting list position. With the existing ICT system this could be part of the rolling '3 year' cleansing but this should eventually become annual with improved technology.

When people apply for a plot and when they are updated on their waiting list position, they should be told if there is any spare capacity at any other plots in the city (see Resources and Finance section for more detail on making lettings more efficient).

If in future demand drops, and there is spare capacity on sites meaning that people are again allowed to apply for more than one plot, there should be an absolute maximum of 4 plots per household as this is the maximum size that can legally be considered an allotment.

A clear policy should be developed on what happens to someone's waiting list position if they refuse a plot they are offered; or if they don't show up.

People on the waiting list should be considered part of the allotment community. There should be great involvement of and opportunities for people on waiting lists (training, information about site open days and volunteering opportunities, and in particular co-working opportunities which has been identified as a 'win-win' option for people on the waiting list). In particular people near the top of the list should be targeted as this has been identified as an optimum moment (once people have a plot they are often too busy working on it).

Land, plot size and plot splitting

Brighton & Hove has constraints on land availability as it is bounded by the sea on one side and the South Downs on the other. There is competition for land from housing in addition to commercial and leisure activities, leading to high land prices. There is very dense housing with a high proportion of flats in the city compared to houses.¹⁶ There is a high proportion of single person households in the city¹⁷ which may be reflected in the survey's findings that 25% of plot holders generally use their allotments alone.

The allotment service is one of the largest in the country¹⁸ and 84% of the city's population is within a 20 min walk of an allotment based on a 5kmh/3mph pace. (A breakdown of these figures is in [Appendix 8: A closer look at land and plot sizes](#)). There are limited opportunities for providing new allotment sites, other than at the periphery of the city (e.g. in Woodingdean); whilst the allotments which are most in demand are in the city centre where more people have limited access to growing space. A planning advisory note¹⁹ gives guidance to developers, encouraging them to include food growing space within new developments but this is mostly on a small scale.

The survey found that whilst the primary use for allotments is food growing, they also serve a wider social and cultural function in a city which has limited land e.g. 23% of plot survey respondents said that a benefit of having an allotment was to have a play / outdoor space for children and 58% said that some of the time or a lot of the time they used their allotment for relaxing outdoors.

In addition to allotment growing, there is a thriving grow-your-own culture in the city, including 30 community food project on allotments; and 45 projects on land other than allotments²⁰. There is potential for raising awareness of these alternatives amongst those who are on the waiting list (See also [Allotment Accessibility](#)).

¹⁶ www.bhlis.org.uk 2011 Census Briefing Housing (50.2% properties are flats, apartments or converted houses)

¹⁷ www.bhlis.org.uk 2011 Census Briefing City Profile

¹⁸ <http://www.brighton-hove.gov.uk/content/leisure-and-libraries/parks-and-green-spaces/allotments-0>

¹⁹ http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/PAN6-Food_Growing_and_development-latest-Sept2011.pdf

²⁰ <http://www.bhfood.org.uk/downloads-publications/4-harvest-evaluation-report-full>

Disparities between sites

Common problems identified by allotmenters in the consultation survey included poor quality soil for growing (particularly with allotments on chalk) and issues with rubbish disposal and plot clearance. There is not scope within this strategy to look at all these issues in detail – though it is expected that they will be looked outside of the strategy process – however in terms of this strategy it is important to understand that there are inequalities both within and between sites.

Within sites there can be better soil in different parts of the sites; areas with particular issues such as vandalism or badger damage; and different levels of access to for example water or parking.

“On our Site we feel we have a really bad deal compared to other plots We are in a corner surrounded on 2 sides with dense weeds, brambles and bindweed. There are trees overhanging the plot. We are also a very long way from the nearest tap and the water pressure is appalling. The paths are not mown. So we get considerably less for our money than the plot holders along the main path. There should be equal facilities for all plot holders.”

Plot holders survey

Between sites there can be different levels of provision, e.g. some sites have trading huts or other shared facilities and others don't. Some have better parking or public transport access. New sites may be piloted without water or with metered water provision. The same formula for calculating rent (£ per square metre) is used regardless of provision.

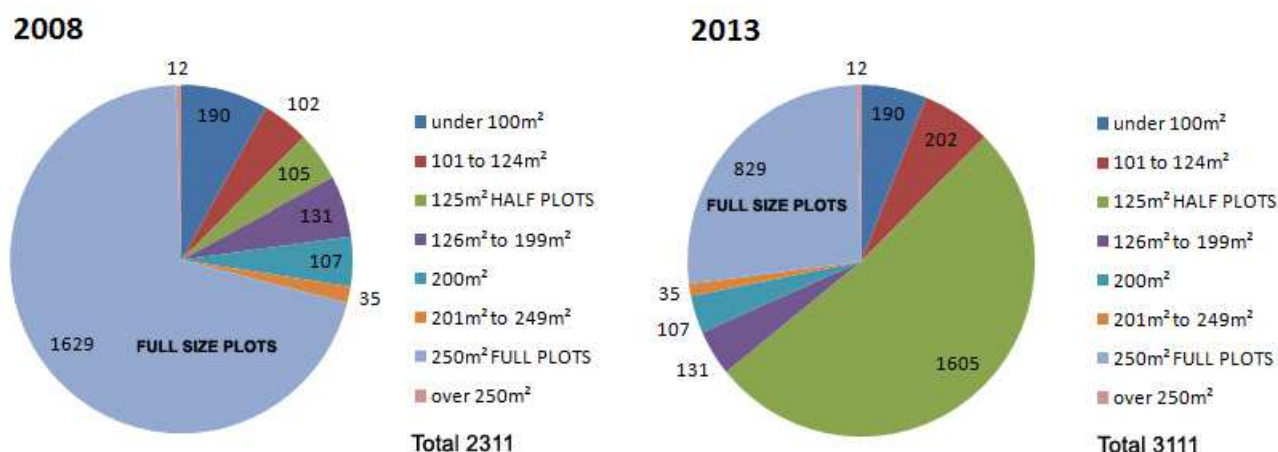
Plot Size and plot splitting

From 2009, Brighton & Hove City Council introduced a policy of only offering 'half' (125m²) plots to new tenants i.e. halving every 'full' (250m²) plot that became available for rent, so that it could be rented to two people. This was in order to reduce waiting list sizes. The [Waiting Lists and Demand for Allotments](#) section shows that the waiting list is currently smaller than had been thought, possibly half the size.

Plot splitting has increased the number of people involved in allotment growing in the city; but reduced the land available to many individuals. There are now around 800

full plots in the city, about half the number in 2008; and about 3111 plot holders, about 800 (or 35%) more than 2008.

Half and full plot holders: how this balance shifted from 2008-2013



The figures for different plot sizes in 2008 are the strategy working group's estimate as the Council does not hold the historical data on plot size.

Figures for 2013 relate to February 2013.

Restricting people to a half plot was an approach that the Allotment Federation and a number of Site Associations opposed for reasons outlined [Appendix 7: Brighton & Hove Allotment Federation reasons for opposing further splitting of plots](#). These include their view that a half plot is not enough land to grow sufficient food to feed a family on or practise proper crop rotation and that smaller plots lead to overcrowding, increased administration and an over-cultivation of land with a loss of bio-diversity.

Understanding and addressing the complex issue of balancing demand with an appropriate provision of land suitable for differing needs was a key issue for this strategy, and both consultation surveys asked for opinion on this. Further detail is in [Appendix 8: a closer look at land and plot sizes](#) but some key points from the plot holders' survey include:

- The majority of people (82%) are happy with their current plot size.

- The majority (64%) thought their land needs would not change in the next five years. However 28% thought they may require a bigger space.
- Although most of the half plot holders viewed their current needs as about right (76%), 22% viewed their land as too small (compared to just 4% of full plot holders).
- 83% of full plot holders did not view any change in land needs over the next five years, compared to 57% of half plot holders.

From the waiting list survey it was found that

- Given a choice, only about 18% of the waiting list would opt for full plots.
- Over half (55%) would choose a half plot.

This means that the current balance in provision of full plots and half plots in the city roughly matches the demands of the people on the waiting list.

Nearly a quarter (22%) of those who responded to the waiting list survey would choose an individual bed if the option was offered. Individual (or 'compact' or 'micro') beds take up very little space compared to full or even half plots, and could be a supportive environment for people new to growing. Site Reps also supported this option as a way to help people develop their skills, and confirm their commitment, before taking on a larger plot.

Therefore this strategy contains a recommendation that a mechanism for providing individual beds should be explored. Issues include

- Whether the Council, allotment associations, existing or community projects (self-organised by people who have rented an individual bed) would manage these.
- The cost per square metre will be higher than the same land managed by just one plot holder due to extra administration, plus additional facilities may potentially be provided (for example a shared shed) so the charge will need to reflect this.

Plot holders showed strong support for introducing a choice of plot size. When asked 'should current plot holders have the opportunity to change plot size?' 91% of people

who replied either agreed or strongly agreed. In response to the question 'should people joining the waiting list have a choice of plot size?' 75% of people who replied either agreed or strongly agreed.

This was re-stated at the consultation event but it was stressed that any choice should be informed about levels of time and skill needed to maintain the different sizes, to ensure that people only take on what they can deal with.

Recommendations:

The City Council and BHAF should continue to monitor the levels of waiting lists in different areas of the city and seek to open new sites in response to high demand, where this is practical. In the meantime the focus should be on the best management possible of existing sites.

There should be a 'principle of choice' established, whereby existing plot holders and those on the waiting list should be able to choose their plot size *according to the mechanisms below, which will be different for large and small sites*. (NB these will develop over time)

New allotmenters should get clear information before choosing a plot as to the hours and work they would need to put in to properly maintain the different sizes of plots, so that these choices realistic and workable (see [Waiting Lists and Demand for Allotments](#) for more detail about informing people on the waiting list)

Site representatives have an important role in helping new plot holders choose appropriate size plots at the letting stage, ensuring that people are aware of the time commitments for different sized plots; and in future facilitating when people choose to upsize or downsize. The Allotments Officer should hold a workshop for site representatives to explain the new processes for both large and small sites.

Further work should be done to explore how 'individual beds' (much smaller than a full or half plot) could be offered to the 22% of people on the waiting list that would choose them, and one or more pilot schemes introduced to look at how this would work in practice, including how much should be charged for them.

Offering a choice of plot sizes – how this could work in practice



1) New categories of sites will be established:

- a. **Small sites** (less than 100 plots)
- b. **Large sites** (greater than 100 plots)

(These categories will be reviewed in three years.)

2) Applications from the waiting list: small sites (<100 plots)

- Irrespective of size of plot that becomes available, the first person on the list will be offered it.

Scenarios

- A full plot becomes available. If the first applicant prefers a full plot, it will be let intact; if they prefer a half plot, it will be halved.

- A half plot becomes available. If the first applicant wants a half plot, it will let intact; if they prefer a full plot, they may accept half or wait longer.

3) Applications from the waiting list: large sites (>100 plots)

- Available full plots (including previously split plots, if both halves are simultaneously available) will be let whole, if one of the top ten applicants has expressed a preference for a full plot.
- The first applicant in the top ten preferring a full plot will be prioritised.
- If only half plots are available, the waiting list will be processed in customary chronological order. If someone would prefer a full plot they may accept half or wait longer.

4) Applications for a second half by existing tenants

- Existing half plot tenants who wish to adopt the neighbouring half plot may apply to do so but only if:-
 - The half plot in question was previously the conjoined half of a whole, e.g. 10/1 may adopt 10/2 but not 9/2. (Note that plots on recently created sites are all 125m² & cannot be conjoined.)
 - The tenant does not have a history of correctly issued notices in the past three years.
- Tenants should communicate that wish to the Allotments Service and their site rep(s).
- The Allotment Service will retain separate records of applications for second halves. (This will effectively be a second waiting list).
- Tenants will be entitled to the second half if it becomes available, provided they expressed their interest more than a year ago. (In practice the likelihood of the second half becoming available will be low).
- Some-one on a half plot can move to a new full plot if one becomes available subject to the same criteria above re cultivation notices.
- They would give up their half plot which would be offered to the waiting list. They would have proved themselves as capable of dealing with a half plot and will know what is involved in taking on a full plot.

5) Choosing to downsize

- Existing plot holders on both large and small sites will be able to downsize from a full to a half plot if they choose, by either spitting their plot (if practical) or swapping with another tenant on their site who wishes to upsize. (Note that this recommendation should be seen along other recommendations made about better support for people who are finding it hard to manage their allotment, such as help for finding a co-worker.)

Resources and Finance

Rental income and the allotment service subsidy

In 2012/13, the rental income from allotments was £107,155 and the expenditure was £ 155,123. The projected budget for 2013/14 showed income of £109,000 and expenditure of £160,130. All the council's allotment income currently comes from plot rentals.

The shortfall between income and expenditure – called the allotment service subsidy - was a little over £48,000 in 2012/13 and is likely to be about £51,000 in 2013/14.

Allotments are charged per meter squared. This price currently includes the land rent water, security & fencing, basic maintenance and administration.

The cost of allotments, rents and the subsidy²¹

	yearly cost of full plot (250sqm)	yearly cost of half plot (125sqm)
Allotment rent	£ 71.40	£ 35.70
Council subsidy	£ 33.60	£ 16.80
Total cost of providing plot	£ 105.00	£ 52.50

In the survey of allotment holders about two thirds of respondents (63%) did not know that the rents from plot holders failed to meet the costs of the service and that the shortfall was met from Council funds.

“You need to weigh up the paltry £51k against the quality of life, health and wellbeing benefits and social cohesion allotments provide. I for one feel much fitter and healthier having an allotment” Plot holders survey.

In the current financial situation (with ever reducing funding from central government) the City Council may have to make allotments, along with many other services,

²¹ Figures from 2013/14 budget

become self-financing. This would mean that the income from allotments would meet the costs associated with providing allotments.

Note that the Council does not wish to make a 'profit' out of allotments – their aim financial sustainability. Also that they are not looking to charge any kind of additional rental or 'premium' on the land itself (as with a commercial model) - the discussion here is purely about covering direct running costs.

The Allotment Federation also acknowledges the financial position of the City Council and has accepted that it is reasonable for allotment rentals to increase with the cost of inflation and it would be appropriate to accept rental rises proportionate to the decreases in central government support, if these cannot be met through other savings.

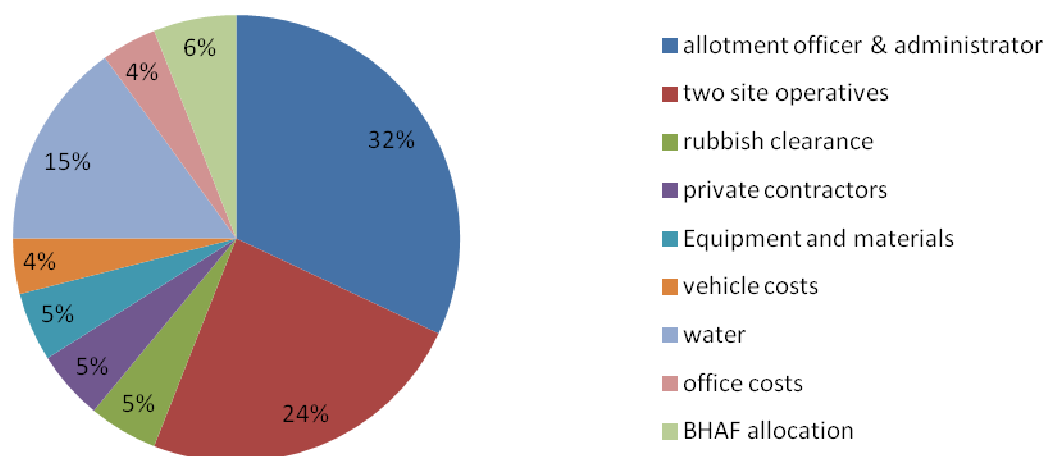
In 2013 The City Council compared the cost of their allotments with elsewhere in the country (see [Appendix 6: Additional information on Resources and Finance](#)).

Brighton & Hove was roughly in the middle, charging £35.70 for a half plot (125sqm). The cheapest comparable authority was Southend which charged £20 for the same size; the most expensive was North Tyneside, charging £53.75, without concessions available. This figure is close to the 'unsubsidised' figure i.e. the actual cost of providing a half plot in Brighton & Hove.

The cost of providing allotments

The major areas cost areas in 2013/14 are Allotment Service (Office based 36%), Allotment Service Operatives (on site 45%) – including staff and support costs- and Water (15%). There is a hidden cost associated with rubbish removal as it is likely that staff time is spent on this. There is a detailed breakdown carried out by Strategy Working Group on Resource in [Appendix 6: Additional information on Resources and Finance](#)

Approx breakdown of allotment costs



Currently those renting a 'half plot' (125m²) pay exactly half the price of a full plot (250m²), even though the administration costs are greater for two half plots than for a full plot as there is more work dealing with two plot holders than with one.

Value for money?

According to the survey of plot holders of 811 respondents 46% of people think the cost of allotments is about right, 24% good value for money and 21% excellent value for money. Around 9% think they are poor or very poor value for money.

Those on a half plot considered their plot better value for money with 26% considering it excellent value for money compared to 16% of those who have a full plot. Those who have been on plots longer tend to think that their plot is worse value for money (possibly because they have experienced a number of rent increases).

Value for money in relation to income

Nearly a third of plot holders in the survey (30%) were in receipt of a concession for their allotment. Overall there was very little difference (about 1%) in their perception of value for money compared to those paying full price.

However there was a substantial difference in perceptions about value for money when these were compared with household income, with 40% of the highest earning households (total income over £45k) finding their plots excellent value compared with around 18% of those on incomes below this. [Appendix 6: Additional information on Resources and Finance](#)

Increasing income through a rise in rents

Currently the only income from allotments is via rental from allotments.

The consultation process has clearly identified allotmenters perceive social, economic and environmental benefits of being involved in food growing so the value of allotments extends far beyond food production and further evidence should be gathered on the potential costs savings in health / social care budgets.

Recognising that allotments have wide benefits the Allotment Federation are keen to work with the Council to reduce the risk of disproportionate rental increases, maximise the efficiency of the Council service and reduce costs through effective partnership working and trialling proposals such as self management of sites.

In order to evidence the impact of allotments on the health and wellbeing of the city and the potential savings in health and social care budgets that allotments may contribute to, a more detailed Social Return on Investment analysis would need to be done.

In the survey, despite high perceived value for money, allotment holders were reluctant to accept a rent increase. 76% of respondents believe that the Council should continue to subsidise the costs of the service that are not met by rents from plot holders.

“Increasing the cost of the plot will reduce economic diversity on the sites. I hope this doesn’t happen as I enjoy the mix of people..... The allotment is a great source of peace and relaxation for me and my family and I hope it doesn’t become unaffordable” Plot holders survey

There was however more acceptance amongst plot holders for increasing rents to those who are paying the full price, while protecting for those on concessionary rates. Even then, 53 % disagreed or disagreed strongly.

There was also reluctance to support increasing rents per square metre for half plots. 49 % disagreed or disagreed strongly with the statement that the rental for half plots should increase to take into account that the proportionate administration and management costs are higher.

Alternatives to increasing the rent per square metre

Variable rental levels

There were several suggestions made during the consultation around charging higher rents for people who are on higher incomes. As an example, using data from the survey, if those household which earn over £35,000 a year (30% of plot holders) paid £10 a year more this would generate an extra £9,000 for the service. However there are difficulties in policing such a system and how much that would cost in relation to the additional income generated. Also it would need to be clear why there was an additional charge and what it was going towards.

Therefore the recommendation below is that voluntary methods should be explored, i.e. people should be given the option to pay extra if they are on a high income and can afford it; and/or some of those eligible for concessions can choose to donate the additional cost back if they are able to afford it. This is similar to schemes where people choose to donate their Winter Fuel payments if they are not in need of it.

Covering the costs of managing the waiting list

Managing the waiting list has a cost attached which currently is included in the general cost of running the service, meaning that the waiting list service is in effect paid for by existing plot holders and the allotment service subsidy. This strategy includes recommendations for improving the experience of people on the waiting list, particularly better communication with them, which could further increase the cost. (See [Waiting Lists and Managing Demand](#))

This strategy recommends to help fund better management of the waiting list a non-refundable waiting list fee (£15) should be introduced.

For example, if 500 people a year paid a £15 charge, this would generate £7500²². As well as generating income to cover the service this may encourage people to consider their commitment more seriously prior to signing up to a waiting list, which is a core aim of this strategy in order to reduce the level of drop outs among new plot holders. (See [Waiting Lists and Demand for Allotments](#) for more on this)

²² This rough calculation uses the figure of 670 applicants to the waiting list in 2013. Assuming that 25% of these would be eligible for concessions so not pay a charge, this would make 502 people.

If implemented it is important that those who would benefit most from allotments are not deterred i.e. there should be no charge for people who are eligible for concessions. It is also important that efficiency savings for running the waiting lists are explored alongside the charge.

People on the waiting list are important stakeholders in the allotment community – this charge should always be related to the service they receive.

Generating additional revenue

There was a consensus between the Council, the Allotment Federation and people who participated in the survey that, whilst at the same time preserving and ideally even improving the efficiency and effectiveness of the service, there should be a serious attempts to operate the service as cost effectively as possible. It is agreed to explore additional sources of revenue, especially services which would benefit plot holders as well as generate income. It was recognised that Council finances may deteriorate significantly and that the Allotment Service may have to work towards a non subsidised model.

The consultation event identified that some plot holders would like to have access to additional paid options– ranging from delivery and erection of sheds or fencing; to wood for DIY construction; and in particular regular deliveries of woodchips, mulches, manure or other soil improvers brought to their plots.

There are also recommendations around exploring alternative funding. In particular there is evidence that allotments may have a positive impact on health, particularly for vulnerable groups, and support public health agendas on promoting mental health, reducing obesity, increasing physical activity and increasing access to green spaces (see [Why allotments are important for our city](#)) Therefore there is an argument for exploring whether concessions for vulnerable groups in particular could be funded via the public health budget, while understanding that these budgets are also under pressure.

The long term aim should be that the cost of concessions should be covered by additional funding (for the social, health and wellbeing provision) rather than by the allotment budget or by allotmenters (see also [Allotment Accessibility](#)).

“An allotment is a ‘social service’ too and helps to avoid loneliness and isolation, so therefore the cost of the service cannot be estimated in traditional ways” Plot holder survey

Savings and efficiencies

Almost a third of those answering the questionnaire (258 People) offered suggestions on ways to make the allotment service more efficient or provided ideas on how to save money.

There were several comments which noted the high cost of rubbish removal. In some cases people felt that they were not seeing sufficient benefit from this charge i.e. they felt that rubbish removal was inadequate.

There were several suggestions for automating systems e.g. introducing payment by automatic annual direct debit; and billing via email. There is evidence the current ICT systems for waiting list management and billing ICT systems are very time consuming for staff and it was suggested costs should be obtained for upgrading these. As well as saving staff time these would lead to a better service for plot holders.

“Paying once a year by debit card isn’t that hard, but it would be easier if it could just be collected as part of my council tax direct debit”.

“There should be a way to get plot-holders to cut communal grass and hedges, saving money”

“Involve volunteers more in the management of the sites”

Plot holder survey suggestions

Additionally, the survey showed that there is support for the allotment community becoming more involved if organised in a fair way. This could range from routine maintenance such rubbish removal or path maintenance; to an additional role in carrying out inspections; through to a fully devolved structure for self-management, as happens in some other areas (see [Participation and Self-Management](#)). There was however concerns about lack of time; and the danger of too much work falling to too few people, leading to burnout.

Also practical issues are important, for example rubbish removal must consider issues such as type of transport, cost of disposal, and legal restrictions on the transport of waste.

Based on figures from November 2013, there are over 400 un-let plots, representing an annual lost income of around £15,000 as well as causing frustration to both plot holders and those on the waiting list. Whilst some plots will inevitably remain vacant whilst they are in the process of being let, it is recommended that this figure is reduced via the recommendations of improving the lettings process including seeking additional funding to improve ICT systems; and supporting site representatives better in managing lettings (see [Waiting Lists and Managing Demand](#) section)

Additional Ideas that have been explored when developing the strategy

In some authorities **deposits** are paid when people first rent an allotment, which is withheld if rubbish is not removed on departure. This is not a recommendation of this strategy currently as these are often modest amounts (e.g. £25) that would not cover the costs, especially when the cost of administering refunds is taken into account. Higher, more realistic deposits may make allotments unaffordable for those on low incomes or with small amounts of savings, particularly if introduced alongside a possible new charge for joining the waiting list (see above).

Water cost are high (15% of total costs). There has been water wastage in the past, with some individuals being insensitive to the costs. There has been little work done to emphasise the possibilities of water harvesting from roofs in the winter and water conservation in the summer. The Working Group which explored this issue also noticed unexpected variations in cost between sites so believe that water leaks may also have quite a high impact on water costs.

Some authorities charge separately for water (calculated on a site by site basis and shared), some authorities do not provide water, and some authorities are looking at providing individually metred water supplies to plots, which could be a consideration for future allotment provision.

There was very little support from allotment holders for the proposal that water use should be rationed (18%) and even less support for the proposal that water should be charged for additionally (7%). Therefore this isn't a recommendation for existing sites, although options such as individual water metering should be explored for future allotment provision. There are important recommendations around encouraging water harvesting and saving water in [The Allotment Environment](#).

The idea of charging different amounts per square metre dependent on different conditions at different sites (e.g. quality of soil, provision of shops, mains water, better parking or transport) was rejected as unworkable at this stage, particularly as there are sometimes similar disparities between different plots on the same site. (More detail in [Land, plot size and plot splitting](#)). It was felt that any charging system which addressed this would fail generate any realistic savings, as the admin time would increase.

These ideas should be revisited when this strategy is reviewed in future.

Recommendations

Rent rises should be minimised and other avenues explored for reducing costs and generating revenue.

Any proposed rent rises which are higher than inflation should be brought to the Allotment Forum as early in the process as possible for discussion with and feedback from elected Site Reps.

There should be an option to pay a higher rent for those on higher incomes; or to turn down a concession if this is not needed. This should be offered on a voluntary (honesty) system; it should be simple to administer; and it should be clear where the money is going e.g. to the allotment improvement fund (for site improvements) or to continue to offer subsidised allotments to those on concessions.

The allotment service should explore efficiency savings in managing both the service and the waiting list, including exploring the costs of new ICT systems for one or both of these. (NB new ICT would require additional funding, it could not come from within current budgets)

Whilst the option for paper invoices should remain, these should become the exception rather than the rule as billing by email is more cost effective.

Payment by annual Direct Debit should also be explored.

The allotment service should introduce a non-refundable administration charge for joining the waiting list of £15 (waived for concessions) to contribute to the costs of running the waiting list including offering a better service to those on the list.

The turnover of plots should be increased, to reduce the amount of vacant plots and increase income. This can be achieved

- by better supporting Site Reps with the lettings process (see [Appendix 5: Recommendations on the role of Site Reps – further detail](#))
- Reducing the time from non-payment or non-cultivation to eviction, which often takes between 6 months and a year. It is believed that the current rules allow for this so it is about enforcing them more promptly. For example there is currently a three month trial period in the tenancy but this is really enforced.
- Better supporting new plot holders via training, mentoring etc to reduce drop-out among new plot holders
- The figures which the council allotment service compile on number of vacancies at different sites should be shared with Site Reps via the allotment forum, to make it easier to track and address where there are high numbers of vacant plots or the lettings process is getting 'stuck'

Alternative sources of income should be explored including charitable support and business sponsorship.

Many site associations already do their own local fundraising, and this should be further encouraged.

The City Council's public health team should consider if there is scope for public health budgets funding some of the concessions thereby in the long

term moving the subsidy for this concession away from plot holders towards health and wellbeing budgets.

The allotment service should explore providing additional services such as manure delivery, and delivery/erection of sheds, as opportunities to generate additional income whilst improving the service to allotment holders. If successful further work could take place to establish demand for services such as provision of vegetable seedlings grown in Council nurseries.

Water reduction should be a priority

- There should be support for the allotment community in for water harvesting and low water methods of gardening (see also [The Allotment Environment](#)).
- The allotment service should review how it identifies water leaks – for example raising awareness of the issue with plot holders – and how effectively they are dealt with by Southern water. Note that the tackling of leaks is already a service priority.
- Future allotment provision should explore ‘smart’ options such as individual water metering.
- The Food Partnership should look for funding e.g. from water companies to resource education work for allotments on water conservation.
- The Allotment Federation should explore how it can offer advice and/or practical support with water harvesting such as providing water butts.

The allotment community should also be supported to reduce the amount of rubbish requiring removal. (See also [Allotment Sustainability](#)).

At least one pilot should look at how some elements of site management and maintenance could be undertaken more cost effectively by plots holders or site associations, for example fence maintenance or rubbish removal (without full self-management).

At least one, and ideally 2-3 sites should pilot self-management (see also Participation and Self-Management) to explore whether this model could be more cost effective i.e. whether some sites could eventually become self-funding and self-managing. Note that these pilots should not in themselves be expected to save money; but to generate information as to whether this could be a cost-saving model in future (a 'ghost budget' should be kept to check this). Also whether self-management is an effective and empowering model for those involved – this should not just be about cash.

Other options which should be explored - but only if it is still not possible to increase revenue sufficiently to meet actual costs – include:

- Modest price increases for half plot holders to reflect the higher charge of providing half plots. [note that the prices for new individual beds will need to reflect the higher cost of providing – see [Land, plot size and plot splitting](#)]
- Rental rises proportionate to the decreases in central government support, if these cannot be met through other savings.

BRIGHTON AND HOVE ALLOTMENT STRATEGY 3-YEAR ACTION PLAN 2014-2017

Action plan dated: 14th February 2014

This Action plan forms part of the **Brighton and Hove Allotment Strategy** 2014-2024 and sets out priority actions for the first 3 years in order to implement strategy. The full Allotment Strategy, and a summary briefing, can be seen at www.bhaf.org.uk and on the Council's website (via the Allotment section)

This action plan is a **living document** and the actions within it will change and develop over time. Many of the actions will require **close partnership working**, so where a lead is given they are responsible for *overseeing and reporting back on progress*, engaging with partners; they are not solely responsible for delivery. Involvement of allotmenters in ongoing development and delivery of this action plan will be encouraged via the Allotment Federation.

Strategy Objective 1: Provide an economic way for people to produce good quantities of high quality, locally grown food.

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Monitor progress on the 10 year strategy and three year action plan; including requirements for additional funding e.g. grants/ sponsorship	Liaison Group	Annual review, 2014-2017; Strategy review & refresh to take place 2019	Liaison group time	Achieving strategy objectives

Strategy Objective 2: Increase the number of people participating in food growing on allotments, so that all sections of the community – particularly the most vulnerable - can enjoy the benefits and fulfill their horticultural potential.

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Information from the Equalities Impact Assessment of the service being completed in early 2014 discussed at the Liaison Group and updates made to this action plan if required.	Liaison Group	By May 2014	Group time	Agreement of action plan re equalities.
Analyse in more detail the survey findings that plot holders are in better health than the general population.	Food Partnership (reporting back to Liaison Group)	2014	Food Partnership time	Understanding of how participation by certain groups can lead to savings in health / social care costs.
Look at national work on SROI to understand the cost and benefits of undertaking some Social Return on Investment analysis of the allotment service for the city.	Food Partnership	2014	Cost of carrying out further research tbc (national)	
Where sites don't have toilets (or there aren't nearby public toilets) seek funds to install and maintain them. (Compost toilets ideal as long as accessibility considered)	BHCC Allotment Officer to lead as action is in EIA	2014-2024	Funding	Those who will most benefit are able to participate in the service
Continue to offer a 25% discount to people over 60, residents in receipt of benefits and students	BHCC			Information about allotments is on the city's Information Prescription website and included in any future work on social prescribing
Allow Community plots that work				

mainly with groups that would receive a concession and/or further the aims of the Allotment Strategy, to apply for the discount	BHCC Allotment Officer and BHFP to look at this issue as part of work on community plots	2012		<p>Better understanding of how to address barriers to access by certain groups</p> <p>Targeted promotion means that opportunities are more widely known about.</p>
<p>Undertake a review of access to the service including by communities at risk of poor physical and mental health.</p> <p>(Include unemployed people, taking into account consideration of 'availability for work' criteria (if necessary seek advice e.g. from BUCFP, Food Partnerships' Volunteer Co-coordinator, volunteer Centre)</p>	BHCC	2014-2015	BHCC staff time (mainly allotment service; other departments tbc) Resources tbc	
The Access Review should include access to and by community groups;	BHCC / Food Partnership			
Develop a procedure for applications from community plots setting out of criteria that define who can apply one.	Food Partnership & BHCC to work on jointly	2014	Criteria / procedure for applications available on website and allotment officer happy with application of procedure	
Set up a sub group of the Allotment Liaison group to include other interested organisations / experts to look at fast-tracking applications for priority groups of people (e.g. via a GP referral.) Any proposal should consider fairness in relation to the criteria used. Any criteria / process used	Liaison Group (with input from equalities organisations/ experts)	2015	Liaison group time Equalities organisations time	

should be unambiguous and transparent; not reliant on the individual discretion of officers or site representatives. The procedure should also include when community groups should be fast-tracked				
Explore opportunities for Site Reps to take part in training about accessibility issues (including for example understanding mental health or physical access).	Allotment Forum	2014-2-17	Some courses may be free for others there may be a small charge for which funding would need to be found.	
Engage with agencies that represent Communities of Interest (e.g. Federation for Independent Living, BMECP, SpeakOut, Age UK Brighton and MIND) to explore opportunities to promote allotments (including community plots) and understand how best to promote allotments to the groups they represent.	BHCC as part of EIA	2014-2017	<i>BHCC time; partner organisation time</i>	
Limited mobility plots at all sites promoted to people on the waiting list who have indicated that they are interested in a limited mobility plot (rather than just the site they are waiting for).	BHCC	2014-2017	Vacancies at plots minimised	
Seek to include info about allotments on the Information Prescription website (initially follow up with Community works	Food Partnership	2014-2015	Food Partnership time	

health rep)				
Encourage people joining the waiting list and being given a plot to complete demographic information.	BHCC	2014-2017	minimal	
Review demographic information from the waiting list every two years and use to inform targeting of promotional work amongst any communities of interest that are under-represented.	BHCC	2015; 2017; then every two years	BHCC (Allotment Service) time Potential resources for any promotional work tbc.	
Advertise the availability of concessions clearly both to people on or interested in joining the waiting list and to current plot holders (as their circumstances may change).	BHCC	2014-2017	minimal	
Explore whether concessions for older people could be supported via Age Friendly City submission to the Big Lottery fund for a citywide project on healthy ageing.	Food Partnership to speak to Age UK Brighton who are leading on this work	2014 – bid going in soon		

**Strategy Objective 3: Ensure sufficient availability of
good quality, accessible land for allotments**

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Continue to monitor the levels of waiting lists in different areas of the city and seek to open new sites in response to high demand, where this is practical. (In the meantime focus on the best management possible of existing sites)	BHCC	2014-2024	Resources tbc	Allotment provision that meets demand for allotments and abilities of aspiring plot holders
Review the size of the waiting list and Council response to it in 2019 as part of the strategy review.	Liaison Group	(agree action : to carry forward to 2019)		
Implement a new system to offer existing plot holders and those on the waiting list a choice of plot size i.e. full plots as well as half plots (for detail see the Strategy)	BHCC	2014-2015	BHCC (Allotment Service) time	
Give clear information as to the hours and work needed to properly maintain the different sizes of plots, so that that people make realistic choices which match their abilities and the time they can commit	BHCC website, Site Reps and Allotment Federation	2014	BHCC (Allotment Service) time	Reduced levels of new plot holder drop out
Hold a workshop for site reps to explain the new processes for both large and small sites	BHCC Allotment Officer	2014-2017	BHCC (Allotment Service) time. Allotment forum time	Better support for site reps.
Explore how site can be supported with lettings (e.g. develop a policy on what happens to someone's waiting	Allotment Forum (possibly via subgroup)	2014-2015	Allotment Forum time; allotment service time	Faster plot turnover leading to a reduced number of vacant plots

list position if they repeatedly refuse plots; or don't show up to viewings) other areas could be helping new plot holders choose appropriate size plots, ensuring that people are aware of the time commitments for different sized plots; and facilitating when people choose to upsize or downsize				
Share the number of vacancies at different sites with site reps via the allotment forum, to make it easier to track and address where there are high numbers of vacant plots or the lettings process is getting 'stuck'	BHCC	2014; ongoing	BHCC (Allotment Service) time	Faster plot turnover leading to a reduced number of vacant plots
Explore how 'individual beds' (or 'micro-beds') could be offered to the 22% of people on the waiting list that would choose them, introduce one or pilot schemes to look at how this would work in practice, including how much should be charged for them. (NB Individual beds may be appealing for people with disabilities because of the more manageable size. Pilots should consider additional support that people with mental health issues/ physical disabilities may require).	Liaison group (to set up a subgroup)	2014-2017	BHAF time BHCC time Site Association time Potential set up costs (e.g. wood for raised beds) and/or providing communal facilities (e.g. shared shed) from allotment service budget. Expected to be self-financing long term via higher charges per sqm	
Ensure better publicity for alternatives to allotments, especially community growing schemes, is on the Council website (with signposting to lists of possible schemes)	BHCC (Supported by Food Partnership BHAF BHOGG)			Easily accessible information on the range of alternative opportunities is available as people join the waiting list and while they wait

Strategy Objective 4: Work towards a self-sustaining and efficiently run service that keeps down costs for both tenants and the Council.

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Introduce a joint Annual review of the allotment service budget based on the principle of open book accounting	BHCC (bringing budget into to the Allotment Forum)	Annual, as part of budget cycle	BHCC (Allotment Service) & allotment forum time	Elected site reps and other stakeholders in the allotment community are informed about and have the opportunity to discuss the budget (including any potential rent rises) early in the process
<p>Review the admin & ICT systems which support the allotment service and the waiting list and do a cost/benefit analysis of where this could be improved, including the potential for adapting other council ICT systems (e.g. application system for parking permits) and/or sourcing new ICT system (s),</p> <p>Issues to include:</p> <ul style="list-style-type: none"> • Informing people on the waiting list about their position • Introduction of a Regular waiting list cleansing exercise (ideally annual) • Informing people on waiting list about spare capacity at other sites (e.g. if there are sites with no waiting list) • publishing info on the website about plot availability on sites, along 	BHCC In consultation with partners	Review 2014 Implementation 2014-2017 (subject to resources)	<p>BHCC (Allotment Service) time. BHCC Finance & ICT department time Additional funding if new ICT system required – amount tbc.</p> <p>Possible postage costs for waiting list cleansing (Allotment service budget)</p>	<p>Overall outcome: An efficient service which minimises costs and maximises officer time for liaising with sites.</p> <p>Other Possible outcomes (subject to review findings):</p> <ul style="list-style-type: none"> • Billing by email • Option to pay by direct debit • People on the waiting list can check their position online and/or receive regular updates • Information on site vacancies and indicators of waiting times freely available and inform people's decisions when they sign up to the waiting list • People on the waiting list are informed about other opportunities to get involved • Reduced number of vacant/ neglected plots

<p>with size of waiting lists (as a percentage of site capacity) indicating possible turnover/ waiting times</p> <ul style="list-style-type: none"> Informing people on the waiting list about training, open days, volunteer opportunities, co-working, community plots etc (as highlighted elsewhere in this action plan) e.g. an option where people give permission for their details to be shared with BHAF / Food Partnership so they can be kept informed about vol opps. Time from non payment or non-cultivation to eviction; and enforcement of '3 month trial' period. 	(Allotment Forum to lead on non-cultivation)			
Introduce an administration charge for joining the waiting list - a non-refundable fee of £15 (waived for concessions) to contribute to the costs of running the waiting list including offering a better service (communication and updates on position) to those on the list.	BHCC (in consultation with the allotment forum)	2014-2015	BHCC (Allotment Service) time. BHCC Finance Department time	Increased income to support improvements to the service for people on the waiting list as recommended in strategy
Contact people on the waiting list who have not responded via the online strategy consultation survey to make sure that they have had a fair chance to respond	BHCC	2014	Allotment Service time	Completion of waiting list cleansing via strategy development process
Introduce voluntary additional	BHCC	2015-2016	BHCC (Allotment Service)	Increased income to support

payment options including <ul style="list-style-type: none"> the option to pay a higher rent for those on higher incomes; The option to turn down a concession if this is not needed <i>Work towards clarity about where this extra money would go e.g. to the allotment improvement fund (for site improvements) or to continue to offer subsidised allotments to those on concessions.</i>			time	strategy outcomes
Explore the business case for providing additional services such as manure or woodchip delivery, and delivery/erection of sheds. Establish demand for services such as provision of vegetable seedlings grown in Council nurseries.	BHCC (Woodchips, vegetable seedlings, sheds) Site Associations (manure)	2014-2017	BHCC (Allotment Service) time Site association time Potential capital start up costs for new services tbc.	Increased income to support strategy outcomes. Better service for allotment holder
Explore opportunities to set up a reuse group for allotments on the city's Freegal website	BHAF / BHFP and Freegal	2014	Freegal time	Reduced wastage from unwanted tool and equipment and increased opportunities to share

Strategy Objective 5: Encourage on site participation to ensure the protection and promotion of allotments for-food growing.

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Provide notice board on all 37 sites, with site representatives responsible for keeping information up to date	BHCC	2014-2019	Notice board costs from allotment budget. BHCC staff time in setting up notice boards. Site rep time in maintaining info	Better communication with allotmenters
Encourage greater use of open days or other open events as a means of bringing together existing plot holders, the local community, plus engaging those on the waiting list for a site	BHAF Individual site associations	2014-2019	Costs to be met by individual site associations or groups of individuals – likely to be self-funding if raffles plant sales etc take place	Greater numbers and diversity of people participating People on the waiting list are seen as part of the allotment community
Publicise opportunities for people who want to volunteer (not just by joining committees) for example helping with site events, mentoring new allotmenters or taking part in routine maintenance. Use <ul style="list-style-type: none"> • newsletters, websites • notice boards, site shops • elections – also use the chance to publicise the alternatives to standing for election 	Site Associations Support from BHAF	2014-2017	BHAF time Site Association time	
Support and encourage site associations with their own local fundraising, such as sales of	BHAF Individual site associations	2014-2017	BHAF time	

produce/seeds/plants/events				
Identify how to take forward the following strategy recommendation and who should lead on it: <i>involvement of and opportunities for people on waiting lists (training, information about site open days and volunteering opportunities, and in particular co-working which has been identified as a 'win-win' option. In particular people near the top of the list should be targeted as this has been identified as an optimum moment to ensure people are prepared and reduce new plot holder dropout (once people have a plot they are often too busy working on it)</i>	Liaison Group	2014 (implementation 2014-2017)	Liaison group time (for implementation, BHCC time, BHAF time, site association volunteer time, possible financial resources tbc)	
At least one, and ideally 2-3 sites to pilot taking on more site maintenance and/or management <ul style="list-style-type: none"> • E.g. take on particular elements such. fence maintenance or rubbish removal • ranging up to self-management (see also <u>Participation and Self-Management</u>) to explore whether this model could be more cost effective i.e. whether some sites could eventually become self-funding and self-managing 	BHAF/BHCC jointly site associations (names tbc)	2014-2017	BHAF time Site Association time	Pilot outcome: information as to whether this is an effective and empowering model for those involved, and which services can be provided more cost effectively at a site level. NOTE These pilots should not in themselves be expected to save money; but to generate information as to whether full of partial self-management could be a cost-saving model in future (a 'ghost budget' should be kept to check this).

Strategy Objective 6: Support the very best practice in growing, so that allotments are a source of education and inspiration for the whole city in good food and healthy living.

Strategy Objective 7: Ensure that the allotment sites, alongside the main role of food growing, play a role in conserving the biodiversity of the city contributing to a healthy living environment

[Actions relating these two objectives are grouped as there are many overlaps.]

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Review support and information to new plot holders including <ul style="list-style-type: none"> • welcome pack • opportunities to be 'mentored' by existing plot holders (formal programme/ informal e.g. people put a 'happy to help' sign up) • Signposting to useful information (see below) plus info specifically aimed at newer allotmenters e.g. food partnership videos on taking on an allotment 	BHAF supported by the Food Partnership	2014-2017	BHAF time	Better support reduces the high level of drop-out among new plot holders
Collate guidance for distributing to site reps, site associations, notice boards, websites to help plot holders (plus those on the waiting list) to help people better: <ul style="list-style-type: none"> • Understand the costs associated with allotment activities, for example leaving taps running, or generating 	BHAF	2014-2017	Mainly time - BHAF and site reps (possible minimal resources e.g. photocopying) Resources may be needed if future if BHAF or other	Existing plot holders and people on the waiting list have increased awareness of organic methods and alternatives Less chemical contamination of land and need to dispose of pesticide containers found

waste that needs removal <ul style="list-style-type: none"> • Find out about alternatives to chemicals; • Access information on organic growing e.g. from the Soil Association • Access training in organic growing techniques for example at BHOGG and the Whitehawk Community Food Project • Compost confidently • Use and waste less water (PRIORITY AREA as identified via consultation – SEE BELOW for further action) 			partners implement an education programme on these issues in future	on plots when people leave. More composting means money spent on rubbish removal. Reduced water usage meaning lower costs and lower environmental impact
Offer a programme of education (subject to resources) with advice and/or practical support with water harvesting such as providing water butts, information on how to make your own water butt; advice on low water methods of gardening	BHAF Food Partnership	2014-2017	BHAF time Food partnership to seek funding to resource a programme of education/ water awareness campaign	Reduced water usage meaning lower costs and lower environmental impact
identify sites where the worst problems are for water leakage in order that any maintenance work can be prioritised	BHCC	2014-2015	BHCC time	Lower environmental impact/ lower costs. Meeting demand for growing space run on organic principles
Consider whether Future allotment provision should explore 'smart' options around water (learning from elsewhere in the country and/or be established on organic principles (not organic certification because of cost)	BHCC	2014-2024	Potential capital costs e.g. for water metering as part of new allotment development (amounts tbc)	
BHCC to Link in with experts e.g.	BHCC and BHAF	2014-2017	BHCC time.	Increased biodiversity

<p>Sussex Wildlife Trust, RSPB to look at:</p> <ul style="list-style-type: none"> • Offering support and guidance to site associations which want to improve biodiversity on their site • managing habitats on the edges of sites for the benefit of wildlife 			Possible finances if paid consultancy need.	
Continue to permit bee keeping on site (with a permit)	Allotment Officer			Pollination and biodiversity
BHCC Biosphere Officer to advise/ sign post on implementation of strategy recommendations, as part of the Biosphere work. If the Biosphere application is successful there is scope to work further with allotment-holders on conservation initiatives, such as recording wildlife, supporting surveys, analysing records, encouraging plants for pollinators and voluntary restrictions on harmful chemical use.	Biosphere Officer	2015-2017	Resources associated with Biosphere work	Greater integration of work on bio-diversity and allotments with other green-spaces as part of Brighton & Hove's Green Network

Strategy Objective 8: Take a co-operative and participative approach to running the service and developing allotment policies and practices

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
<p>Establish a new City Allotment Forum to replace the current site reps meeting and provide a platform for site reps to engage with each other and the city council plus others .The Forum will</p> <ul style="list-style-type: none"> engage with and gather the views of other stakeholders for example from public health, the CCG (Clinical Commissioning Group) the police, voluntary and community groups include representation from people on the waiting list (mechanism tbc) set up working groups (subject to resources) will hold at least 3 initial facilitated sessions to establish the terms of reference for allotment forum, review rules, and agree role descriptions for site reps Explore issues such as improving the lettings process (see above) 	<p>BHAF to lead on setting up.</p> <p>Allotment Forum to establish own terms of reference (NB full involvement of site reps in doing this crucial)</p>	<p>Establish and agree terms of reference 2014</p> <p>How effectively this dual role works should be reviewed as it developed; for example it might be necessary to target one or more meetings per year for wider stakeholder involvement; and keep the remainder focused around site reps.</p>	<p>BHAF resources to fund basic meeting costs</p> <p>Funding required (£1500 for three sessions) for facilitated sessions – from allotment service budget</p> <p>BHCC & other organization staff time attending.</p> <p>Volunteer site rep (and other time) attending main meetings plus working groups</p>	<p>Participation, and the involvement of the allotment community, is a key principle in allotment management.</p> <p>Allotment Forum established as an outward facing forum to take forward issues on allotment running and agree new rules and policies.</p>
<p>Establish refreshed Allotment Liaison Group to replace existing Liaison group and oversee</p>	<p>Allotment Strategy Group</p>	<p>Strategy group continue to meet 2014</p>		<p>New Liaison group in place, ensuring oversight of strategy objectives.</p>

implementation of the allotment strategy, and track progress. The liaison group should develop clear and transparent terms of reference, which will be subject to regular review. During the first year of strategy implementation, membership based on the current allotment strategy group to ensure continuity and forward progress on the strategy action plan prior to handing over to a refreshed group in year 2.		Establish and agree new terms of reference by 2015 Review 2017		
Clarify relationship and reporting arrangements between the Allotment Forum and Liaison group.	Allotment Liaison group (involving Allotment Forum)	2014		Clear responsibilities, and effective sharing of information between the two groups
Support new site associations to form however this is practical (e.g. new or smaller sites may choose to affiliate to pre-existing societies.) Initial focus on increasing numbers. When action plan reviewed in 2017 look at how involvement can be measured, including diversity, without adding unnecessary bureaucracy	BHAF	2014- 2024 Review 2017	BHAF steering committee time Other volunteer time. Including on sites Start up funding available through BHAF site development fund	Increased number of site associations and societies. Greater numbers and diversity of people involved in site associations
All associations to make formal links with the Allotment Federation	Site associations BHAF	By 2017	Site Association volunteer time	BHAF has greater accountability
Site reps elections implemented on all 37 sites – phased in over a 5 year period. (detail in allotment strategy 'governance' appendix 4)	BHAF (plus individual Site Associations)	2014-2019 Review 2017	BHAF steering committee time. Site Association time	By 2019 all site representative are elected, giving greater authority and accountability to the role
Agree a transparent appointment mechanism agreed for where site	BHCC (consulting with	2014 development. Implement 2014-2019	Allotment service time	Transparent recruitment in place for appointed site reps

reps are directly appointed (as an interim measure while elections are rolled out)	allotment forum)			
Agree Clear role descriptions for site rep along with transparent processes for dismissal and complaints developed (facilitated session)	Allotment Forum (possible working group)	By 2015	BHAF resources to support Allotment Forum including volunteer expenses. Facilitator expenses (see above) Allotment Forum time i.e. volunteers from BHAF and sites. BHCC staff time	The role of site reps is clarified, supported and strengthened.
Review the role of site reps to assess whether further changes need to happen e.g. if should be split into two or more roles.	Allotment Forum	Review in 2017	BHAF resources to support Allotment Forum including volunteer expenses.	Greater diversity of site reps Better training and support (including peer support) for site reps, especially new site reps. Consistency in the
Identify Barriers to becoming a site rep and take action to remove. When action plan is reviewed in 2017, look at how involvement can be measured, including diversity, without adding unnecessary bureaucracy	Allotment Forum	2014-2017	Allotment Forum time i.e. volunteers from BHAF and sites.	
Develop training and support program - especially chances for reps to share learning with each other. E.g. visits to share good practice on organic growing; "moderation"	BHCC (with input from BHAF & allotment forum)	By 2015	BHCC staff time	

meetings, where a group of representatives from different sites look at how they enforce particular rules (e.g. giving out non-cultivation notices). Also workshop on new lettings process (see above)				interpretation of rules
Brighton and Hove Allotment Federation (BHAF) to continue to revise its structures and constitution, broaden its active membership and widen participation in its decision making (e.g. its committee) to better reflect the diversity of allotmenters.	BHAF	By 2015	BHAF volunteer time	Improved BHAF accountability
<p>BHAF to explore how people on the waiting list can be formally included e.g. membership of site associations and/or BHAF e.g. as "associate" members, cost and mechanism to be explored. This could include</p> <ul style="list-style-type: none"> • inclusion in Federation newsletters • Notification of committee meetings, Forum meetings and thereby Liaison Group meetings. • Notification of any BHAF training opportunities. • The opportunity to contact each other (eg through a facebook page) and through such contact the opportunity to form their own working group. • If they have set up any such group the opportunity (right?) 	BHAF	2014-2017	BHAF volunteer time	People on the waiting list are seen as part of the allotment community

<p>to have it represented at the Forum</p> <ul style="list-style-type: none"> Limited (in terms of numbers) opportunity to attend the Forum as individuals. <p>(see also training opportunities; co-working opportunities etc for people on the waiting list elsewhere in this action plan)</p>				
<p>Facilitated session to review allotment rules Involving site reps reps/BHCC. Separate rules to be developed for community groups. An annual interim process agreed for revising rules that don't need a full 3 year review</p>	Allotment Forum working group	2014	Funding for facilitator (see above) from allotment service budget	Streamlined allotment rules that are up to date with current policy and enforceable on a practical level
<p>Regular 3 year review of allotment rules led by the Allotment Forum (if necessary informed by a working group)</p>	Allotment Forum working group	Initial review 2014 (see above) then 2017; 2020; 2023	Basic meeting costs to be met by BHAF BHCC officer time in attending sessions	

Strategy Objective 9 Ensure that learning and evidence gathered from the development of this strategy is shared within the city and used to inform other policy work.

ACTION	Lead responsibility (NB will engage partners in delivery!)	Timescale/Milestones	Resources	Outcome
Presentation to the Health and Well being Board on the findings of this work	BHAF / Food Partnership	2014	Staff time	The health benefits of allotments, particularly for those experiencing mental or physical health issues, are considered in decision making on public health. In the long term the subsidy for this concession moves away from plot holders towards health and wellbeing budgets.
Consider whether there is scope to incorporate in the JSNA and/or for public health budgets to fund some of the concessions for these groups	BHCC Public health	2014-205	BHCC and other partner time	
Information from this work shared with the national Growing Health project (Sustain)	Food Partnership	2014	Staff time	Wider sharing of learning from the allotment strategy

Subject:		Official Feed and Food Controls Service Plan 2014/15	
Date of Meeting:		4th March 2014	
Report of:		Executive Director of Environment, Development & Housing	
Contact Officer:	Name:	Nick Wilmot	Tel: 292157
	Email:	nick.wilmot@brighton-hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 To agree the Official Feed and Food Controls Service Plan previously known as Food Law Enforcement Service Plan required by the Food Standards Agency.

2. RECOMMENDATIONS:

- 2.1 That the committee agrees the Official Feed and Food Controls Service Plan 2014/2015 set out in the appendix to this report.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Food Standards Agency's Framework Agreement on Local Authority Food Law Enforcement requires the production and publication of a service plan. Every local authority is required to develop an annual food enforcement service plan, which provides the basis on which local authorities are monitored and audited by the Food Standards Agency.
- 3.2 To ensure local transparency and accountability, it is a requirement that the Official Feed and Food Controls Service Plan is submitted to the relevant member forum for approval.
- 3.3 The attached plan (Appendix A) is an integral part of the organisation of Regulatory Services within Planning and Public Protection.
- 3.4 In accordance with the Standard outlined in the Framework Agreement the food service is a mix of enforcement, intelligence based work, investigation and education. It is planned that a performance targets of completion of 98% of programmed food safety interventions and 90% of service requests responded to within 5 days.
- 3.5 In addition, areas of current good practice, and opportunities for further improvement, have been identified, both in Food Safety and Food Standards, in section 6.3 of the Service Plan. The targeting of resources to these areas of work aims to provide a balanced mix of services, which is most likely to benefit the business sector, consumers and other stakeholders. The service will continue to focus enforcement action on the poorer performing businesses.

- 3.6 It is pleasing to note that the general standard of hygiene attained by local businesses continues to improve with the number of those deemed 'broadly compliant', achieving a standard of 3 or more out of 5 on the Food Hygiene Rating Scheme (FHRS), rising from 91.4% in December 2012 to 92.9 in January 2014.
- 3.7 Unfortunately against the general trend it is concerning that the number of prosecutions undertaken for food hygiene offences for the current year has increased from an average of three to four a year to six between April 2013 and January 2014. A significant number of these prosecutions have been as a result of mouse or rat infestations. This may have been due to a number of factors including poor management and economic difficulties.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 There is no legal alternative to the statutory service plan.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The planning process is governed by the national Food Safety Framework Agreement and so follows the same format each year. In past years draft plans have been circulated to the Brighton & Hove Food Partnership, the Brighton & Hove Citizens panel and Regulatory Services Peer Review.

6. CONCLUSION

- 6.1 That the committee agrees the Official Feed and Food Controls Service Plan 2014/2015 set out in the appendix to this report.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The costs associated with implementing and enforcing the proposed Official Feed and Food Control Service Plan 2014/15 will be met from the Food Safety revenue budget within Environmental Health. The proposed 2014/15 budget for the Food Safety service is £581k, which is subject to approval as part of the budget proposals to Budget Council on 27th February 2014.

Finance Officer Consulted: Steven Bedford

Date: 29th January 2014

Legal Implications:

- 7.2 The Food Standards Agency places a requirement on local authorities to develop and submit a service plan. Local authorities are audited and assessed by the Food Standards Agency on the basis of their food law enforcement service as provided for in their Service Plans. The Food Safety Act 1990 (Code of Practice) places a requirement on local authorities to operate an inspection rating scheme, which determines frequency of intervention of food premises. The Official Feed and Food Controls Service Plan 2014/15 identifies the planned number of interventions for that period.

Equalities Implications:

- 7.2 An Equalities Impact Assessment has been undertaken. See 2.4.5 of appendix 1 for profile of food premises registering with the food service during the year 2012/2013. The service is mindful of the greater assistance food business operators require where their first language is not English. Written information, translation and interpreting services are employed where necessary to assist businesses to comply with regulatory requirements.

Sustainability Implications:

- 7.3 Liaison with relevant agencies in connection with local food initiatives, including the Brighton & Hove Food Partnership

Any Other Significant Implications:

- 7.4 None

SUPPORTING DOCUMENTATION

Appendices:

1. The Official Feed and Food Controls Service Plan 2014/15

Documents in Members' Rooms

None

Background Documents

None

Appendix A DRAFT
Brighton & Hove City Council Official Feed and Food Controls Service
Plan 2014/2015

1. Service Aims and Objectives

1.1 Aims and Objectives

- 1.1.1 The food service function of Brighton & Hove City Council is enforced by Environmental Health and Trading Standards staff within Regulatory Services under the Head of Planning and Public Protection who reports to the Executive Director of Environment, Development & Housing.
- 1.1.2 Environmental Health & Licensing staff are primarily concerned with protecting and improving public health and the environment across the City. Within this service food safety officers work to ensure that food prepared and sold from local establishments is safe. This is achieved by carrying out a programme of interventions at food businesses, sampling and responding to service requests. Wherever practicable links are formed with the business community and all relevant professional groups with the objective of increasing and promoting food safety awareness.
- 1.1.3 The overall objective of the service is to provide a comprehensive food safety service to benefit consumers and the business community, with a considered balance between enforcement, investigation, advice and education.
- 1.1.4 Trading Standards officers aim to provide a comprehensive range of enforcement and advisory services to the community within a statutory framework. Its goal is to contribute, in conjunction with other agencies, to the development of a safe, fair and equitable trading environment for all consumers, by means of advice, information, education and enforcement.

The core aims being to ensure: -

- § Accurate and informative labelling of food; and
- § That compositional standard of food is maintained.

The objectives being: -

- § To carry out risk-based and intelligence led activities;
- § To undertake screen testing and food sampling to reflect identified areas of concern;
- § To respond appropriately to food complaints and initiate proportionate action;
- § Respond to trader requests in a timely manner; and
- § To educate the public on compositional and labelling issues to improve eating habits.

1.2 Links to Corporate Objectives and Plans

1.2.1 Brighton & Hove City Council's Corporate Plan 2011-2015 is structured according to its four priorities of:-

- § Tackling inequalities
- § Creating a more sustainable city
- § Engaging people who live and work in the city
- § Responsible and empowering employer

1.2.2 The service has strong links with these priorities. In particular the outcome to reduce health inequalities and long standing public health issues as part of the priority of tackling inequalities. This includes the desire to continue with high profile enforcement of food safety standards and maintaining an excellent record of environmental health improvements.

1.2.3 The Official Food and Food Control Service Plan is part of the corporate annual planning and development process.

1.2.4 The service has a published Enforcement Policy. This policy is a cornerstone for fair and open enforcement.

1.2.5 The service continually monitors business opinion through satisfaction surveys. This fits in with the priority of engaging people who work in the city. The findings help to ensure that the service meets the requirements of local businesses, residents and visitors and provides a service the city deserves.

2. Background

2.1 Profile of the Local Authority

2.1.1 Brighton & Hove is a unitary authority on the south coast of England. It is approximately 50 miles from London. Bounded by the English Channel to the south and the South Downs to the north, it covers an eight-mile stretch of seafront and extends inland for approximately five miles.

2.1.2 The total resident population of Brighton & Hove as at the 2011 Census was 273,369. Demographic information is available from online Brighton & Hove Local Information Service <http://www.bhlis.org/>.

Resident Population by Ethnic Group 2011 Census

White British, Irish, mixed and other	243,512
Asian or Asian British	11,278
Black or Black British	4,188

- 2.1.3 Tourism plays a major part in the local economy. Figures from the VisitBrighton Strategic Partnership 2010 estimate that 15% to 20% of jobs in the city are tourism related and eight million visitors bring £400 million into the local economy. The city boasts 4293 bedrooms, offering a bed stock of approximately 10,000. There is a large variety of hotels, food retailers and over 400 restaurants serving cuisine from around the world. The VisitBrighton Visitor Survey 2007 identified that 70% of visitors put going to a restaurant or place to eat as one of the most popular activities to do in Brighton & Hove.

2.2 Organisational Structure

- 2.2.1 Brighton & Hove City Council is a unitary authority that operates a committee system model. Responsibility for the food safety and standards services is delegated to the Environment & Sustainability Committee.

2.3 Scope of the Food and Food Service

- 2.3.1 A specialist Food Safety Team within Environmental Health carries out the food safety function. The work of the team includes:-

- § Inspecting food premises:-
- § The investigation of food safety complaints;
- § Food poisoning investigations when linked to a premises;
- § Investigating infectious disease notifications;
- § Microbiological food sampling;
- § Food safety training;
- § Responding to requests for advice;
- § Initiatives relating to working with the community and businesses;
- § Taking appropriate steps to publicise and act upon national food alerts;
- § Publicising the food hygiene standards of local businesses.

- 2.3.2 The food standards function is carried out by Trading Standards Officers in the Business Support Team. The work of the team includes the following: -

- § Risk based enforcement activity;
- § Complaint investigation;
- § Food analysis and investigation;
- § Service Requests from businesses;
- § Education programmes;
- § Reacting to Food Alerts.

- 2.3.3 Food Standards work is undertaken in conjunction with work on other areas of Trading Standards law. For instance, a programmed food visit will also include giving advice about other matters such as prices, business names and weights and measures. In this way, a comprehensive visit is undertaken so as to minimise any inconvenience caused to the general day-to-day running of the business.

- 2.3.4 Both Trading Standards and Environmental Health officers have responsibility for enforcing relevant legislation in respect of imported product of animal origin and non animal origin, The food safety team deal with microbiological issues and Trading standards, compositional standards and also contaminants which includes mycotoxins and chemicals.

2.4 Demands on the Feed and Food Service

Food Safety

- 2.4.1 As at January 2014, there are 3285 food businesses registered. These premises are broken down into the following profile:-

3	Primary Producers
43	Manufacturers/Processors
1	Packers
4	Importers/Exporters
29	Distributors/Transporters
626	Retailers
2577	Restaurants and other Caterers
2	Manufacturers Selling Mainly by Retail
3285	TOTAL

- 2.4.2 Three food businesses are approved under Regulation (EC) 853/2004 for specific dairy, fish and meat products processing.

- 2.4.3 The nature of the city causes a considerable seasonal variation in the department's workload. Some businesses only open during spring, summer or school holidays, the intervention programme has to be tailored to meet these service needs. There is a dramatic increase in the number of visitors in the spring and summer and this increases the volume of requests for service, enquiries and other reactive work. Outdoor events such as music events, festivals, specialist markets, farmers' markets, open-air concerts and funfairs also add to the seasonality of the workload.

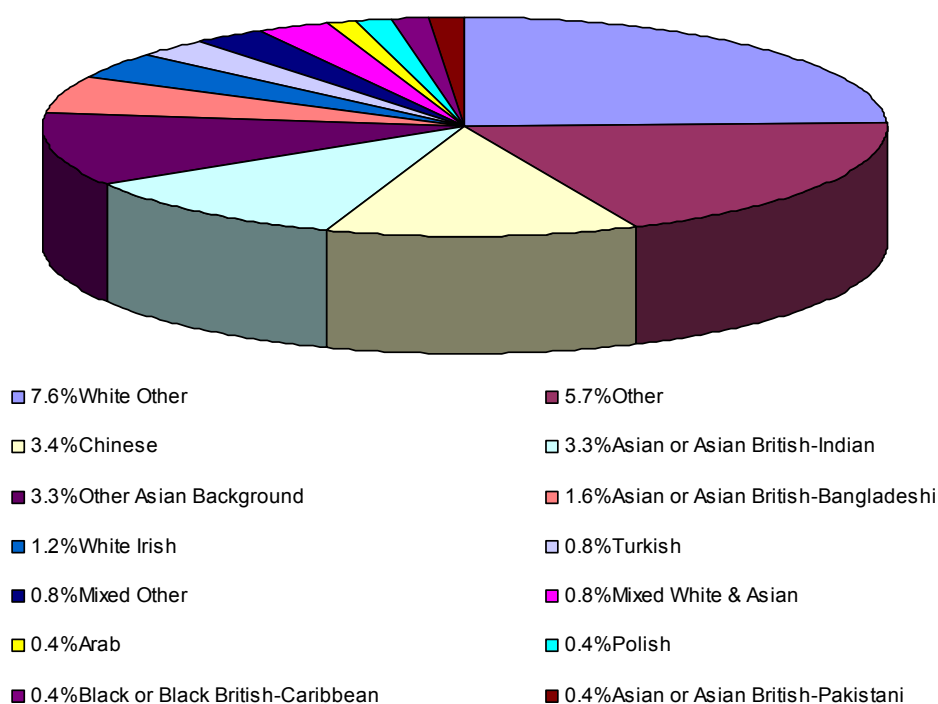
Food Standards

- 2.4.4 Premises data is captured on Uniform and therefore the premises profile is the same but as the risk assessment is based on the LGR scheme the individual premises have a different inspection frequency for Food Standards. As of the 8 January 2014, 2363 premises were considered to have an 'inspectable risk' for Food Standards work. It has been noted that there is a high turnover of new premises requiring food standards advice.

Access to services

2.4.5 As part of the drive for continued improvement and dialogue with businesses, all establishments are requested to complete feedback questionnaires following inspections. The questionnaires request information on the ethnic origins of the business owners. Of the questionnaires returned between April 2012 and March 2013 69.8% of the respondents identified themselves as White British. The ethnicity of the remaining was as below.

**Ethnicity of Food Businesses Where Notified
2012/2013**



2.4.6 In addition to having a number of key food safety advice leaflets in a variety of languages, the service has the capacity to have any leaflet, letter or other document translated as required. Wherever possible, opportunities are taken to provide information about services to ethnic communities. Where necessary, interpreters accompany officers on planned interventions. Where necessary, officers can access The Big Word On-Call Language Service by telephone when carrying out visits.

2.4.7 Access to the service is provided by:

- § Visiting either Bartholomew House or Hove Town Hall Customer Services Centres, opening hours 8:45am to 4:30pm on weekdays;
- § Self-help points across the city including all the main council offices, libraries, leisure centres and some schools;

- § General telephone calls to the Call Contact Centre on (01273) 292161;
- § Advice can also be accessed via the council's website, www.brighton-hove.gov.uk;
- § Email to ehl.food@brighton-hove.gov.uk.

2.4.8 Food Standards complaints are initially received by Citizens Advice Consumer Service. There is a referral protocol regarding food issues requiring enquiries to be sent to Trading Standards within 24 hours.

2.4.9 The food safety team operates a hotline where businesses and consumers can obtain immediate advice from a food safety officer, during office hours. Senior food competent environmental health staff provide cover for an out of hour's service to respond to food safety emergencies and incidents.

2.4.10 New food businesses registering with the service are provided with access to a wide range of online documents hard copies can be provided on request to assist compliance with food safety legislation.

2.5 Regulation Policy

2.5.1 The Council has a Corporate Enforcement Policy in line with the national Regulators Compliance Code for Enforcers. The enforcement policy is grounded in better regulation principles of proportionality, accountability, consistency, transparency and targeting.

2.5.2 Any breaches of food law noted in businesses where Brighton & Hove City Council has an interest, either as proprietor or responsibility for structural repair, are brought to the attention of the Chief Executive without delay.

3 Service Delivery

3.1 Interventions at Food and Feedingstuffs Establishments

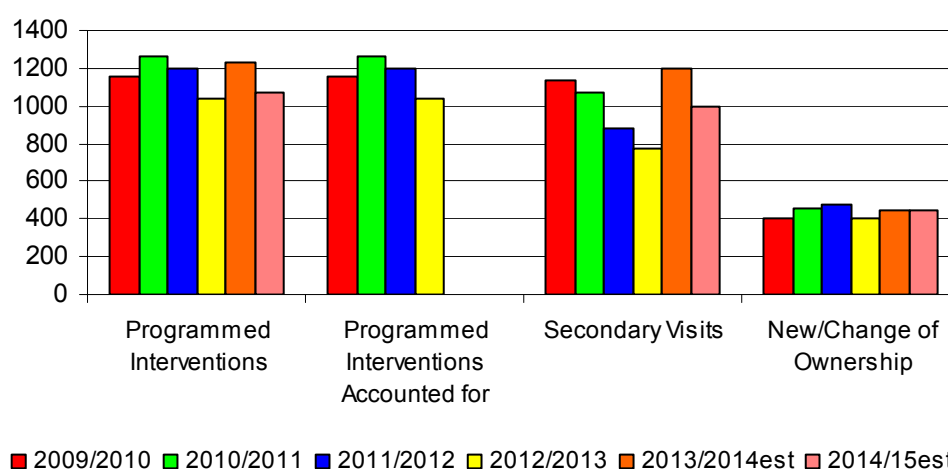
Food Safety

3.1.1 This section details the planned risk based food safety intervention programme for 2014/2015. The level of achievement in food safety intervention based activity over the past four years is shown in the chart below along with estimates for completion of the current year and 2014/2015.

3.1.2 Inspection intervals are calculated on a risk-based approach. The service sets a target of 98% compliance with the annual programme. Table 3.1.1 estimates the number of planned interventions for the current year and 2014/2015. The target takes account of possible service or operational problems such as a turnover of staff at the end of

the year, emergencies or difficulties contacting seasonal businesses or home caterers. In reality, achievement approaches 100%.

Chart of Intervention-Based Activity 2009-2015



See tables 3.1.1 and 3.1.3 for further details.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Programmed Interventions	1159	1262	1197	1043	1232	1073
Accounted for	1156	1262	1197	1043		
Target %	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D	
Achieved%	99.7 A-D	100 A-D	100 A-D	100 A-D		

Table 3.1.1 Achievement of Planned Food Safety Inspection/Intervention Programme 2009-15.

3.1.3 The Food Safety Code of Practice contains a mechanism for risk rating each businesses based on factors such as:- if unwrapped high risk-food is handled, prepared or cooked; size of the business; any high-risk operations are undertaken; number of customers; vulnerability of the customers to food-borne illness; standards of hygiene; condition of the structure and confidence in management. By scoring all of these factors, an overall risk rating of A to E is arrived at. Category A premises are the highest risk and E the lowest.

3.1.4 Category E businesses present a minimal risk due to the limited types of food they handle and/or they cater for a limited number of people. The service operates an alternative enforcement strategy to maintain surveillance of these low risk businesses. This strategy enables the service to provide greater focus on higher risk category A to D establishments. Migration to the national Food Hygiene Rating Scheme (FHRS) for publishing food hygiene standards in March 2012 required an increase in validation inspections of category E businesses.

3.1.5 The alternative surveillance of low-risk businesses follows a structured documented procedure: postal questionnaires, sample inspections to check the validity of the information gained and follow up inspections.

- 3.1.6 Migration to FHRS has resulted in the need for a greater level of surveillance. The service therefore proposes to alternate between a questionnaire and intervention on the usual frequency for category E establishments. An estimate of the number of interventions for 2013/14 and 2014/15 has been included into table 3.1.2.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Questionnaires	188	277	175	66	296	354
Interventions	-	-	-	77	30	70

Table 3.1.2.Premises dealt with under alternative strategy or inspected.

- 3.1.7 Planned food safety interventions programme for the year 2014/2015 as at January 2014 is:-

Risk Category of Premises	Number of Interventions Due
A	3
B	68
C	695
D	307
Total	1073
Low-risk premises due for intervention	354

- 3.1.8 The target is to achieve a minimum of 98% of the annual inspection programme. The three product-specific premises approved under Regulation (EC) 853/2004 will receive interventions within the risk rated programme as necessary.
- 3.1.9 The Food Safety Code of Practice encourages food enforcement services to provide greater focus on the outcomes of activities rather than the traditional approach of reporting on activity alone. Local authority performance is monitored by the Food Standards Agency through the Local Authority Enforcement Monitoring System (LAEMS).
- 3.1.10 A further target is to ensure that at least 85% of food establishments are 'broadly compliant'.
- 3.1.11 As at December 2013 the level of broadly compliant establishments rated in the FHRS scheme stood at 92.6%. This level of compliance protects public health, the local economy and reputation of the council as a responsible regulator.
- 3.1.12 **Secondary Interventions** - The main purpose of secondary interventions is to monitor food businesses that fail to comply with significant statutory food safety requirements, or where directly required by Regulation. Failure could include:-

- § Failure to comply with a single requirement that compromises food safety, public health or prejudices consumers;
- § Failure to comply with a number of requirements that, taken together, indicate ineffective management; or

§ Service of a Hygiene Emergency Prohibition Notice or Order.

3.1.13 When considering both the need for and timing of a secondary intervention, consideration is given to the seriousness of any failing, history of the business, confidence in management and the likely effectiveness of this action when compared to any other enforcement option.

3.1.14 Safeguard measures associated with the FHRs permits any food business that does not attain the top rating of five to request a rescore once any necessary issues have been resolved. The revisit must be unannounced and made no sooner than three months after the initial intervention and within three months of the request being made.

3.1.15 Other secondary interventions are categorised as those that are not primary interventions but include:-

- § Additional interventions of establishments that are subject to product-specific food hygiene regulations;
- § Sampling visits;
- § Visits to check on the progress of measures required after a previous intervention;
- § Visits to investigate food and food premises complaints;
- § Visits to discuss implementation of Hazard Analysis of Critical Control Points based system;
- § Visits involving training of food handlers;
- § Inspections of premises to assess a licence.

3.1.16 **Interventions at New Businesses/Change of Ownership** - Where the service becomes aware that ownership of a food business has changed or a new business has commenced, it aims to undertake an intervention within 28 days of the business starting trading.

3.1.17 The purpose of the intervention is to establish the scope of the business, gather and record information, determine if food sampling or swabbing is necessary, identify food safety breaches, determine relevant enforcement action to be taken by the food service, communicate this to the business and determine a risk rating score. Based on the last five years' data, it is predicted that there will be 450 new businesses or changes of ownership in 2014/2015.

3.1.18 **Monitoring of Vacant Premises** – The service aims to inspect all new food businesses within 28 days of opening. Food safety law does not require prior approval.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Secondary inspections	1131	1072	885	777	1200	1000
New Premises or Change in Ownership	398	461	475	389	450	450

Table 3.1.3 Estimate for 2014/2015 based on data since 2009.

- 3.1.19 It is estimated that the number of staff required to carry out the programme of inspections plus other visits is 8.5 full time equivalents. Resources required to undertake secondary visits generated by complaints, enquiries or to undertake sampling are included in the appropriate part of this plan.

Food Standards

- 3.1.20 The LGR system requires high-risk premises to be visited each year, medium risk every two years and the low risk every five years. This means that all 60 high risk, 50% of the 866 medium risk and 20% of the 1437 low risk premises should be visited each year
- 3.1.21 The target for 2013-14 was to visit 60 high-risk and 433 medium risk premises liable to inspection. Similar targets will remain in place for 2014/15.
- 3.1.22 There is no commitment to visit low risk premises but in 2013-14, 185 low risk premises were visited up to 8th Jan 2014 as a result of project work, complaints and other routine inspections.
- 3.1.23 Approximately 5% of inspections require a follow-up visit. Officers do not work exclusively on the food function. Follow up visits will be made to all premises when a non-compliance is detected and formal action is contemplated.
- 3.1.24 One full time and currently two part time posts make up the Food Team. This equates to 1.6 FTE. About 80% of their time is spent on the food function.
- 3.1.25 **New Businesses** – Trading Standards Officers aim to assess new food businesses within 56 days.
- 3.1.26 **High Risk Premises** - Premises with good management control, no history of contraventions or complaints will be subject to a minimum intervention approach and will only be inspected if they change their product range or complaints are received.
- 3.1.27 **Poorer performing High Risk Premises** -These premises will be inspected every year but may be the subject of additional interventions depending on their compliance. Nationally and locally most food fraud has concerned misdescribed alcoholic drink of unknown provenance.
- 3.1.28 **Medium Risk Premises** - These premises will receive an intervention at two yearly intervals. These interventions will alternate between comprehensive inspections, and a mix of sampling visits, complaint visits or other monitoring or surveillance. At least 50% of the premises liable to an inspection will be subject to a comprehensive visit.

3.1.29 **Low Risk Premises** - A programme of interventions will be based on the intelligence received about the individual premises or where the business requests support/advice.

3.2 Feed and Food Complaints

Food Safety

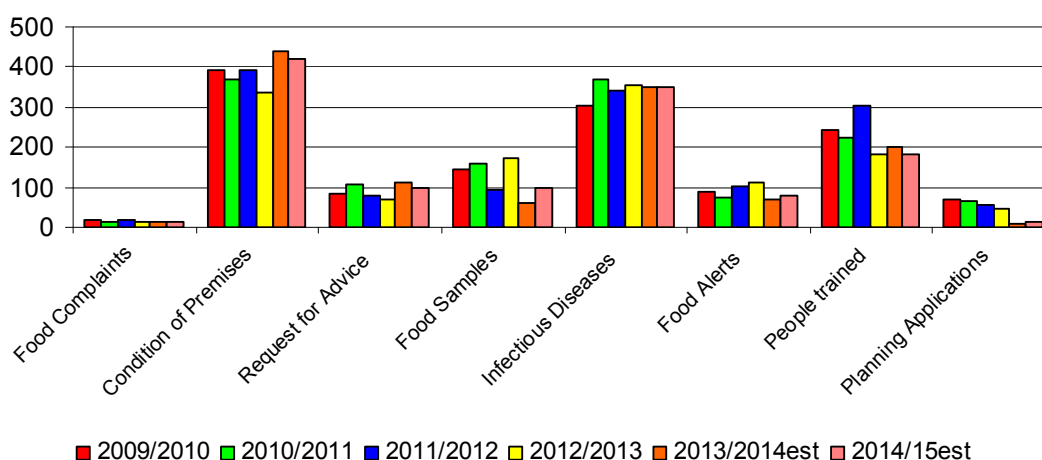
3.2.1 It is the policy of this authority to respond promptly to all requests for advice from business. It is the target of the service to respond to 90% of planning application consultations within 10 working days, and all other demand driven work within 5 days.

Year	08/09	09/10	10/11	11/12	12/13
Within target %	96.6	97.7	98.8	97.3	96.2

Table 3.2 Percentage of Demand Driven Work within Target Response Time

3.2.2 All food complaints received are investigated in accordance with the council's Enforcement Policy and documented procedures. See below for a chart showing the pattern of demand driven work since April 2009 and estimates for the current year and 2014/2015. The source figures for this chart are contained in tables within the relevant part of the plan.

Chart of Demand Driven Work 2009-2015



See tables 3.2.1, 3.4.1, 3.4.3, 3.5.1, 3.6 and 3.8 for the source of data.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Food Complaints	20	12	20	15	13	12
Condition of Premises	394	371	394	338	440	420

Table 3.2.1 Number of complaints for current year and 2014/2015 based on data from 2009 onwards.

3.2.3 It is estimated that 1.5 Full Time Equivalent officers will be required to meet this level of service requests.

Food Standards

3.2.4 It is the policy of this authority to respond promptly to all food complaints and to carry out enquiries in accordance with the complaints

procedure. The following figures show a final estimate for 2013/14 as the report is generated before the end of the calculated year.

Year	08/09	09/10	10/11	11/12	12/13	13/14 est
Number of Complaints	295	279	185	104	130	121

3.3 Home Authority Principle and Primary Authority Principle

3.3.1 Brighton & Hove City Council fully supports the Home Authority principle, and has entered into six formal and 22 informal arrangements with businesses whose operational activity extends outside of the city. Currently there are no primary authority food businesses in the city.

3.4 Advice to Businesses

Food Safety

3.4.1 Advice is given during inspections, by hotline, website, newsletter and as part of the planning application process.

Year	09/10	10/11	11/12	12/13	13/14 est	14/15est
No of Requests	82	109	79	68	114	100
Planning Applications	70	64	56	48	9	12

Table3.4.1 Requests received since 2009 and estimates for the current year and 2014/2015

3.4.2 It is estimated that 0.5 Full Time Equivalent Officer is required to meet this estimated demand.

Food Standards

3.4.3 The level of requests for advice has remained reasonably consistent over several years. The following figures show a final estimate for 2013/14 as the report is generated before the end of the calculated year.

Level of Service Requests

08/09	09/10	09/11	10/12	11/13	13/14 est
192	151	188	158	137	152

3.5 Feed and Food Sampling

Food Safety

3.5.1 A formal arrangement is in place with the Health Protection Agency's Food Water & Environment laboratory based at Porton Down for the analysis of samples that require microbiological examination.

3.5.2 The service participates in national microbiological sampling initiatives coordinated by the Public Health England (PHE), countywide programmes co-ordinated by the Chartered Institute of Environmental

Health (CIEH) Sussex Food Liaison Group and locally devised surveys. Samples of food and swabs of food-contact surfaces may also taken as part of routine work and when investigating specific issues at food premises.

3.5.3 During 2013/2014, the service took part in national food sampling programmes:-

- § Study 50 – Soda water study: Plain soda from soda gun or fixed dispensing point.
- § Study 51 – Pre-packed sandwiches.
- § Study 52 – Fresh ready to eat herbs.

3.5.4 In addition to these nationally agreed programmes, the service took part in Sussex-wide microbiological sampling programme monitoring cleanliness in catering establishments. To identify potential issues with cleaning in premises where there is a low confidence in management. The project to be used to reinforce required standards and educate catering staff.

3.5.5 Sampling is also carried out during routine food hygiene inspections to aid officers in the assessment of practices carried out within commercial kitchens and identify any issues. Where any unsatisfactory results were found, corrective action was put in place to ensure the quality of food products.

3.5.6 As at January 2014 national and the CIEH Sussex Food Liaison Group sampling plans had yet to be finalised.

3.5.7 An Environmental Health Officer within the Food Safety Team is responsible for organising and co-ordinating food safety sampling. It is estimated 0.25 Full Time Equivalent officer will be required for this service.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
No. of samples	146	160	94	175	60	100

Table 3.4.3 Food Safety Samples Submitted 2009-2013 & estimate for the current year and 2014/2015.

3.5.8 Arrangements are in place with the Health Protection Agency laboratory at Porton Down for the analysis of samples that require microbiological examination. The allotted cost for sampling for the financial year 2013/2014 was £11,429.

3.5.9 As at January 2014, the allocation for the year 2014/2015 had not been confirmed.

Food standards

3.5.10 The Public Analyst contract was awarded to Public Analyst Scientific Services (PASS) in 2013. The current allocation of budget for sampling

analysis is £4,500. The focus of the contract remains composition, labelling and chemical contamination.

3.5.11 Inspections, investigations and advice for 2013/14 equated to approximately 1.6FTE.

3.5.12 A budget of £ 4,500 was allocated in 13/14 to facilitate the contract with the appointed Public Analyst for the purposes of food analysis. Sampling programmes are informed by FSA initiatives, TSSE regional and local intelligence.

Food Sampling Work undertaken in 2013/2014

<u>MONTH</u>	<u>PROJECT</u>
April-July	Traceability of meat products FSA initiative
July-Sept	Foreign labelling
September	Meat and Fish Species
Nov- Jan	DNP body building supplements
Year long	Spirits Sampling as a part of the inspection programme
Year long	Home Authority Sampling
Year long	Complaints/Officer initiative

3.5.13 The national initiative is fully funded and takes account of potential problems requiring further investigation. The cost for the regional and local projects will be set to allow for contingencies, such as complaints and reacting to food alerts.

3.5.14 During 2012/13 large quantities of illicit alcohol were found in the City. Whilst some of this was smuggled and non duty paid alcohol, a quantity had been found that was not of the nature substance or quality demanded. As this was deemed to be an emerging potential food fraud, officers gave this priority in 2013/14 and the sampling programme took this into account. However the threat does appear to have been reduced. Following the national horsemeat crisis officers were asked to undertake sampling work investigating the traceability of meat products in the City. No major issues were found.

3.5.15 During 2013/14 Trading standards have also carried out work funded by the FSA on animal feed which ties in to the Official Feed and Food Controls. The FSA following the lead of the European Food Standards Agency and the Food and Veterinary Office are also pushing controls on imported food and are asking coastal Local authorities to check what is coming in through marinas and small ports.

3.5.16 **Control and Investigation of Outbreaks and Food-related Infectious Disease** - Specific infectious diseases are notifiable to the local authority. The department investigates these cases in an attempt to identify the cause of illness and any practical measures to control

potential outbreaks. See below for the number of cases investigated from 2009 to 2013 and an estimate of the numbers expected for the current year and 2014/2015. Investigations of outbreaks must commence as soon as practical. In individual notifications, the investigation has to commence within 5 days. It is estimated that 0.5 FTE officer will be required to meet this level of complaints.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
No. of reports	304	369	339	357	350	350

Table 3.5.1 Notifications for 2013/2014 & 2014/2015 based on data from 2009 onwards.

3.5.17 The number of notifications included in table 3.5.1 has been corrected to discount those illnesses not associated with food such as mumps, measles and hepatitis. The estimate of the total notifications for the current year has been increased due to the effect of an increase in *Shigella flexneri* cases.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Campylobacter	125	222	198	174	180	180
Salmonella	60	33	35	29	35	35

Table 3.5.2 Estimate of Number of specific notifications for 2013/2014 & 2014/2015

3.5.18 Food-borne illness can be contracted as a result of a number of reasons including poor food handling in the home or foreign travel. It is therefore difficult to attribute any increase or reduction to one source.

3.6 Feed/Food Safety Incidents

3.6.1 An out of hours emergency service is staffed by senior staff who are suitably authorised to carry out the full range of food safety functions including responding to emergency food safety incidents.

3.6.2 Information regarding national food safety alerts, such as product recalls from the FSA, is received during office hours via the national alert system.

3.6.3 The Environmental Health Manager (Food Safety) and senior staff within the Food Safety Team are registered on the rapid alert system to receive food alerts through a text message scheme direct to their mobile phones. The information contained in the food incidents is distributed and acted on as deemed necessary.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Food Alerts	88	76	102	113	70	80

Table 3.6 Food Alerts for the current year and 2014/15 based on data from 2009 onwards.

3.7 Liaison with Other Organisations

Food Safety

3.7.1 There are a number of arrangements in place with other professions and local authorities to promote consistency, provide joint projects and develop services: -

- § The Environmental Health Manager attends the Sussex Food Liaison Group which develops common approaches to regulation across Sussex.
- § An Environmental Health Officer attends the Chartered Institute of Environmental Health's Sussex Food Study Group which develops joint procedures and practices.
- § Regular liaison meetings with Children's Services and school caterers.
- § The Health Development team develops initiatives such as promoting breastfeeding or making it easier for mothers to breastfeed their babies while in restaurants.
- § Unfortunately, the Brighton & Hove Food Partnership have had to withdraw from administering the local Healthy Choice Award initiative to promote healthy menu options in commercial catering settings. The scheme will continue to run in relation to children's breakfast clubs and nurseries.
- § District Control of Infection Committee, Community Consultant in Disease Control reviews procedures and agrees communicable disease outbreak and food poisoning control measures.
- § The authority is a member of the Brighton & Hove Food Partnership. The partnership includes representatives from local businesses and community groups, community workers and members of the Sustainability Commission. The Partnership raises awareness of food producers in supporting health, the economy and the environment increasing access to nutritious, safe, affordable food and providing a network for information exchange.
- § A liaison arrangement is in place with Sussex Career Services and local schools to enable teachers and students from Brighton & Hove to gain work experience.
- § Head of Regulatory Services sits on the Healthy Weight programme board

This work is accounted for in the reactive work estimate of resources required.

Food Standards

3.7.2 The team works closely with 18 other Trading Standards Services in the southeast that together make up Trading Standards South East (TSSE). Activities include liaison on all trading standards issues, co-ordinated activities, sampling and advice projects and sharing of

information via the TSSE intranet. As well as this officers use the national knowledge hub which allows access to trading standards services nationally. The team also work directly with the FSA and receive food alerts which identify problem products which we can move quickly to remove from the food chain at a local level.

3.8 Feed and Food Safety and Standards Promotional Work, and Other Non-Official Controls Interventions

3.8.1 The city Health and Wellbeing Board's strategy focuses on priority areas where it can make the greatest impact. The strategy includes healthy weight and good nutrition. The Food Safety Team work with Brighton & Hove Food partnership on the Healthy Choice Award promotes healthy menu options in a diverse range of settings targeting health inequality: nurseries, breakfast clubs and after-school clubs and care homes.

3.8.2 The service organises a number of food hygiene training courses per year. The food safety training activity April 2012 to March 2013 and total numbers of people trained are given below. The CIEH Level 2 Award Food Safety in Catering course is a full day course aimed at food handlers.

3.8.3 During 2012/13 184 people were trained on the Level 2 course.

Year	2009/2010	2010/2011	2011/2012	2012/13	2013/14est	2014/15est
Trained	245	225	303	184	200	180

Table 3.8 Total Training Undertaken Since 2009

3.8.4 13 Level 2 Awards in Food Safety in Catering courses have already been scheduled for 2014/15. The service also offers the CIEH Level 3.

3.8.5 The service took part in Food Safety Week during June 2013 by organising displays in Customer Service Centres at Bartholomew House, Hove Town Hall, Brighton Town Hall and Hove Library.

3.8.6 In September 2013 the Food Safety Team organised the fourth annual Curry Chef of the Year competition.

4. Resources

4.1 Financial Allocation

Food Safety

4.1.1 The proposed 2014/15 budget for the Food Safety service is £581k, which is subject to approval as part of the budget proposals to Budget Council on 27th February 2014.

Food Standards

- 4.1.2 It is difficult to detail the time spent on the food standards function as it is carried out during a comprehensive inspection. Time monitoring is not currently used to apportion time to the food function. Cost of the food standards function in 2013/14 was as follows based on the percentage of time officers spend on the food function outlined above and below:

Staffing Inspection, complaints and advice	
Management/Support	£ 3,200
Food Team	£42,170
Total	£45,370
Purchases	£ 500
Analysis	£ 4,500
Total	£ 5,000
Total	£ 56,370

The budget has not yet been set for 2014/15 but similar funding levels are envisaged as 2013/14.

4.2 Staffing Allocation

Food Safety

- 4.2.1 Establishment of the Food Safety Team for the year 2014/2015 is 11.45 full time equivalent field officers plus two full time equivalent administrative support staff and management, broken down as follows:-

1 x Environmental Health Manager
 2 x Senior Environmental Health Officers
 3.85 x Environmental Health Officers
 4.6 x Senior Technical Officers

- 4.2.2 All enforcement staff comply with strict guidelines governing qualifications and competencies before they are permitted to undertake food safety duties. All Senior Technical Officers hold Higher Certificates in Food Premises Inspection and are able to inspect all risk categories of food businesses. All Environmental Health Officers are qualified to undertake inspections of all risk categories of food businesses.

- 4.2.3 Six officers within the other Environmental Health & Licensing Teams retain competencies to undertake food safety inspections. All food competent officers must undergo a minimum of 10 hours food safety training per year to retain their authorisation to undertake food safety inspections. In addition to the competencies and qualifications required by the Food Safety Code of Practice, officers engaged in food safety

inspections must have undergone additional 'Food Hygiene Rating Scheme' consistency training.

Food Standards

- 4.2.4 The Inspection and Sampling Team is responsible for Food Standards Inspection. The proportion of time allocated to this function in 2013/14 was estimated as follows:-

Support	0.05
Management	0.05
Food Staff	1.6
Total	1.7 FTE

4.3 Staff Development Plan

- 4.3.1 The Authority has a structured appraisal and development system. During staff appraisals, individual training needs and any gaps in competence are identified. The information is used to produce individual training and development plans for each officer for the coming year.
- 4.3.2 Through this system, the service ensures that all food competent officers receive sufficient good quality focused food safety training to comply with relevant Codes of Practice and professional membership schemes.
- 4.3.3 The service currently has three staff undergoing part time or distance learning to become Environmental Health Officers.

5.0 Quality Assessment

5.1 Quality Assessment and Internal Monitoring

Food Safety

- 5.1.1 The service has a documented procedure relating to food safety duties. Internal audits are carried out to ensure compliance with these procedures. The service is accredited to ISO 9001 and externally audited by the British Standards Institute.
- 5.1.2 The service actively seeks the views of businesses by giving out post-inspection questionnaires to traders inspected. In 2012/2013, 265 questionnaires were returned. The key findings of these returns were:-

§ 96.1% of respondents were either very satisfied or satisfied that Brighton & Hove City Council had done all that it could to help deal with their premises inspection.

§ 98.5% of respondents understood the purpose of the visit to their premises.

§ 97.7% found the information given to them by the visiting officer easy or very easy to understand.

Similar high levels of satisfaction were recorded from questionnaires returned in the previous six years.

Food Standards

5.1.3 We aim to continually improve the level of service provided. Procedures are implemented and reviewed where necessary to incorporate identified improvements.

6. Review

6.1 Review Against the Service Plan.

Food Safety

6.1.1 In addition to the quality checks detailed in 5.1, performance is reviewed against the Service Plan by comparing the number of interventions achieved against the number programmed. Monthly statistical reports are produced so that performance can be closely monitored and managed through the year. Any problems are promptly identified and resolved through management reviews, team meetings and monthly one to ones between field staff and their line manager.

6.1.2 Official Food and Food Controls Service Plans are produced and reviewed on an annual basis by management review and consideration by elected members through the committee structure and Full Council.

6.1.3 In the year 2012/2013, 100% of the due food safety interventions were accounted for. This included interventions carried out and businesses that ceased trading before they could receive their planned intervention. 389 interventions were undertaken of new businesses or premises that had changed ownership.

6.1.4 At January 2014, 92.9% of the food businesses in the city were deemed to be 'broadly compliant', or better ie a Food Hygiene Rating Score of three or better.

6.1.5 The 2013/2014 Service Plan predicted that a total of 1232 food safety interventions would take place in this year. To the end of December 2013, 299 inspections of new businesses were undertaken and the service is on target to achieve the goal of carrying out interventions in at least 98% of the businesses due.

- 6.1.6 From April 2013 to mid January 2014, 48 Hygiene Improvement Notices were served, seven businesses voluntarily closed and undertook three successful prosecutions and a further four cases in chain.
- 6.1.7 Charts in Section 3 give a detailed breakdown of service activity from April 2009 to March 2013 and an estimation of the activity for the remainder of the current and coming year.

Food Standards

- 6.1.8 Service reviews are carried out on a monthly basis to check that the inspection programme is on target and to ensure that projects are being completed in the agreed timescale.
- 6.1.9 The Service Reviews indicate that the service is on target to achieve the interventions programme.
- 6.1.10 During staff one-to-one's each officer's performance is monitored, to identify good performance and any areas of improvement.
- 6.1.11 Complaints are responded to within the stated timescales.

6.2 Identification of Any Variation from the Service Plan

Food Safety

- 6.2.1 Reviewing the final outcome of 2012/2013 and the current prediction, as at January 2014, for 2013/14 against last year's Service Plan shows four probable areas of variation.
- § The 2012/13 Service Plan estimated that there would be 720 secondary interventions undertaken, see 3.1.12 for a definition. It is now expected that this number will rise by 66% to 1200. It is thought that this is a result of the general improvement of standards brought about by the Food Hygiene Rating Scheme enabling staff to provide greater support to the poorer performing establishments.
 - § The number of complaints received about the condition of premises has risen on the number estimated for the third year in a row. It is current estimated that for 2013/14 the number of complaints received will rise by 25% to 440. It is thought that the publicity associated with a high profile food safety prosecution in the early summer of 2013 and the public awareness of the Food Hygiene Rating scheme has raised the profile of the service.
 - § The 2012/13 Service Plan estimated that there would be 80 requests from businesses for expert advice from the service. It is now expected that this will increase by 42% to 114, and this level to

continue in 2014/15. It is pleasing that businesses are increasingly using the service in this way. As a result of this the number of planning applications viewed by the service has dropped from an estimated 65 to nine for this year. As the number of new businesses making a proactive approach to the service has increased there has been less requirement to use the planning application process to make businesses aware of the required standards.

- § The 2013/14 plan estimated that 300 people would attend formal food safety training with the service. This estimate has now been reduced to 200. It is thought that the increased availability of training from other organisations and on-line training packages has caused this.

Food Standards

6.2.2 There was no significant variation from the plan.

6.3 Areas of Improvement

Food Safety

6.3.1 As a result of publishing the food safety standards through the Food Hygiene Rating Scheme standards generally are continuing to improve. Table 6.1 demonstrates the improvement which have been built on the local Scores on the Doors scheme since migration to the national scheme in March 2012.

FHRS rating	April 2012	Jan 2013	Jan 2014
0	6	3	4
1	114	113	95
2	86	92	83
3	284	265	266
4	508	589	638
5	1311	1377	1469
Total	2309	2624	2555

Table 6.1. Number of food businesses in each FHRS Rating

- 6.3.2 During 2013 Brighton & Hove City Council took part in a pilot scheme where the FSA paid for additional free coaching to 40 of the poorest performing takeaways in the city. Hot food takeaways who achieved a score of two or less on the Food Hygiene Rating Scheme were targeted. Full analysis of the results will become clear once all businesses have received their next programmed inspection.
- 6.3.3 The FSA produce national performance data for local authority food services based on information received in annual returns. It is pleasing to note that Brighton & Hove City Council, which is eight largest of the

56 English Unitary authorities by number of food establishments, when compared to that group:

- § Was one of only three that accounted for 100% of the planned interventions in 2012/13.
- § Was above the average with 92.98% of food businesses deemed 'broadly compliant or better'.

Food Standards

6.3.4 Advancements have been made in the delivery of food law enforcement. There are many examples of joined up working and co-operation where co-ordinated sampling programmes and officer training feature highly. However, there are still areas for improvement. They are as follows:

- § Targeting beer, wines and spirits misdescription and traceability, this work links in with the Licensing Authority function and Alcohol Project Board.
- § Improved use of the Environmental Health newsletter to provide businesses with information.
- § Increasing the number of voluntary contacts by businesses
- § Developing the access to on-line business advice.
- § Better publicity for the healthy eating education message.
- § Developing links with schools
- § Increasing and maintaining the competency and professional development of food officers.
- § Establishing consumer concerns and reflect this in local activity.

Subject:	Health and Safety Service Plan 2014-15		
Date of Meeting:	4th March 2014		
Report of:	Executive Director of Environment, Development & Housing		
Contact Officer:	Name:	Roy Pickard	Tel: 29-2145
	Email:	roy.pickard@hotmail.com	
Ward(s) affected:	All		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 The Health & Safety Service Plan is required under section 18 of the Health & Safety at Work Act etc 1974.
- 1.2 This work is very important to a city like Brighton & Hove with its leisure and tourist industry, its night time economy and its retail businesses. It keeps the city's workers, residents and visitors safe and healthy and enhances the city's reputation as an attractive place to work, live and visit.

2. RECOMMENDATIONS:

- 2.1 That the Committee approves the proposed Health & Safety Service Plan 2014/2015 at Appendix 1.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Health and safety legislation in Great Britain is enforced by HSE or one of the over 380 Local Authorities (LA) depending on the main activity carried out at any particular premises. In general Local Authorities are the main enforcing authority for retail, wholesale distribution and warehousing, hotel and catering premises, offices, and the consumer/leisure industries. In Brighton and Hove this is approximately 8,000 businesses.
- 3.2 Each LA is an enforcing authority in its own right and must make adequate provision for enforcement. The LA National Enforcement Code introduced in May 2013 sets out the principles that each LA should follow to ensure a consistent, proportionate and targeted approach to regulation based on risk.
- 3.3 Local Authorities use a number of intervention approaches to regulate and influence businesses in the management of health and safety risks including:
provision of advice and guidance to individual businesses or groups
proactive interventions including inspection reactive interventions e.g. to investigate an accident or complaint.

- 3.4 LA inspectors may use enforcement powers, including formal enforcement notices, to address occupational health and safety risks and secure compliance with the law. Prosecution action may be appropriate to hold duty holders to account for failures to safeguard health and safety.
- 3.5 The Health & Safety Annual Service Plan is a statutory document required under guidance issued by the Health and Safety Executive (HSE), Section 18 Standard. This standard requires Local Authorities to make adequate arrangements for providing a health and safety service that includes an enforcement role.
- 3.6 There have been a number of national health and safety reviews over the last 5 years. Consequently central government thinking on how local authorities should approach enforcement of health and safety has changed. Regulators are to achieve their objectives in a way that minimises the burdens on business. Local Authorities are to embed a risk-based, proportionate, targeted and flexible approach to regulatory inspection and enforcement. This approach will ensure that regulators are efficient and effective in their work, without imposing unnecessary burdens on those they regulate.
- 3.7 In Brighton and Hove this has meant that less resource is required to provide a health and safety service that includes an enforcement role. Since 2009 staffing levels have been reduced from 5.5 to 3.2 full time equivalents.
- 3.8 Local Authority Circular (LAC 67/2 (rev4) has recently been revised and is guidance under Section 18 Health and Safety at Work etc Act 1974 (HSWA) and replaces LAC 67/2 (rev3) and all earlier versions.
- 3.9 The LAC provides LAs with guidance and tools for priority planning and targeting their interventions to enable them to meet the requirements of the National Enforcement Code (the Code).
- 3.10 LAC 67/2 (rev 4) details national priorities that local authorities should have regard to and participate in. These are:
- The national programme of work for the control of legionella
 - Raising awareness on the duty to manage asbestos
 - Animal contact at visitor attractions.
 - Underground LPG
 - Investigation of incidents and complaints
 - Reactive work only in accordance with the Beauty sector strategy.
- 3.11 National programme work that has been completed includes the control of legionella with the City's cooling towers being proactively inspected. Additionally we have also carried out an intervention with city's spa pool operators to raise standards. Brighton & Hove animal attraction has been visited to ensure it complies with current guidance. We have no underground LPG that the LA has enforcement responsibility for. We have investigated all incidents and complaints. We continue to register all skin piercers in the line with the national beauty sector strategy.

3.12 Additional local priority work that will be carried out in 2014-15, will be supporting the city's large outdoors events and partnership working with the Falls Prevention Team to help reduce the numbers of preventable fall in the care homes.

3.13 To ensure local transparency and accountability, it is a requirement that the Health & Safety Service Plan is submitted to the relevant member forum for approval. It also requires members to make a commitment to the Health & Safety Executive strategy 'be part of the solution'

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

4.1 The Service Plan is a statutory requirement. Section 18 guidance, LAC 67/2(rev 4) and The National Code provides direction to local authorities on meeting statutory requirements

5. COMMUNITY ENGAGEMENT & CONSULTATION

5.1 The service plan will be part of a rigorous consultation process in March 2014 involving members of the public, employers, employees, internal and external stakeholders such as Trade Unions, Corporate Health & Safety and local business forum. It must be a published document and is also available on the Council's website.

5.2 Businesses satisfaction rates for the Health and Safety service remain high with 99.4% of business feeling that they had been treated fairly and 98.8% of businesses felt the contact was helpful.

6. CONCLUSION

6.1 This report details how the Council intends to comply with its statutory duties.

6.1 Whilst the primary responsibility for managing health and safety risks lies with the business who create the risk, health & safety regulators have an important role in ensuring the effective and proportionate management of risks, supporting business, protecting their communities and contributing to a wider public health agenda

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

7.1 The costs associated to regulating and enforcing the proposed Health & Safety Plan 2014/15 will be met from the Health and Safety Service revenue budget within Environmental Health. The 2014/15 budget will be determined as part of the budget proposals to Budget Council on 27th February 2014. The net budget for the service in 2013-14 financial year is approximately £231,000, which includes the costs of support services and management and administration support.

Finance Officer Consulted: Steven Bedford

Date: 21/01/14

Legal Implications:

- 7.2 Section 18(4) of the Health & Safety at Work etc. Act 1974 imposes a duty on every local authority to make adequate arrangements for the enforcement within their area of the relevant statutory provisions for which they are responsible, and to perform those duties in accordance with guidance issued by the HSE. The Health & Safety Service Plan proposed for approval will assist the council in discharging its section 18 duties,

Lawyer Consulted: Liz Woodley

*Date:*15/01/14

Equalities Implications:

- 7.3 An Equalities Impact Assessment has been completed as part of our contact with groups during discussions in 2010 a review of this impact assessment was carried out in 2012.
- 7.4 Where business considers that they operate in a lower risk sector and have been unreasonably subject to a proactive health and safety inspection by an LA they can complain to the Independent Regulatory Challenge Panel whose members have the competence and experience to assess regulatory matters.

Sustainability Implications:

- 7.5 Unacceptable risk, fatalities and major injuries would reduce development of the city, tourism and benefits to local people, in addition to private and family lives.

Any Other Significant Implications:

- 7.6 The service plan protects public health by improving standards in work places reducing sickness and ill health. The public and visitors to the city are also protected from accidents and incidents that can lead to injury.
- 7.7 A safe and healthy workforce benefits the local economy and develops the city's tourism.

Crime & Disorder Implications:

- 7.8 Violence at work is a national priority. The need for intervention would have regard to premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off licences/care settings) and where intelligence indicates that risks are not being effectively managed

Risk and Opportunity Management Implications

- 7.9 Proportionate decision making is required by the Council's Enforcement Policy, HSE's Enforcement Policy Statement and Enforcement Management Model

Public Health Implications:

7.10 The Director of Public Health commissions a workplace and community health development service and health check service. Three part time nurses funded by PH deliver health checks in workplaces and community:

- Advice: smoking, alcohol, stress, weight, cardiovascular, cholesterol, blood pressure, exercise.
- Clinical: Blood lipids including Cholesterol, HbA1c (test that shows the average amount of sugar in your blood) routine blood glucose test, CVD risk calculator by Qrisk

Small business grants scheme is administered to promote employee health & wellbeing. Health development advice includes programmes for physical activity promotion and workplace charter.

Health and safety at work enforcement complements accident protection work like road safety and home safety. E.g. the health and safety team work with adult social care regarding reducing falls in care homes

Corporate / Citywide Implications:

7.11 Inspectors take a risk based approach to intervention planning for both local & national priorities

SUPPORTING DOCUMENTATION

Appendices:

1. Health & Safety Service Plan 2014/2015

Documents in Members' Rooms

1. None

Background Documents

1. Health & Safety at Work etc Act 1974
2. Reducing administrative burdens: Effective inspection and enforcement – Philip Hampton - March 2005
3. Health & Safety Executive strategy 'be part of the solution'
4. Local Authority Circular (LAC 67/2 (rev4))
5. Common sense, Common Safety - Professor Ragnar E Lofstedt October 2010
6. Lord Young Report - Department of work and pensions. Good Health & Safety, Good for Everyone March 2011
7. Local Government Group2 (LGG) and HSE published joint guidance - "Reducing Proactive Inspections
8. Reclaiming Health & Safety for all. An Independent review of health & safety

legislation. Professor Ragnar E Lofstedt. November 2011

9. The LA National Enforcement Code

Appendix 1

Brighton & Hove City Council – Service Plan - Health and Safety at Work – 2014/15

Overall **Aim** of the Service:

Tackling inequality by engaging with people who live and work in the City to protect public health by ensuring that the risks in changing workplaces are properly managed.

Summary of national planning priorities 2014 - 2015

Over arching principles

Local Authorities should decide, plan and target their health & safety interventions having regard to the range of interventions available, the risk profile of the business/sector, national information (accident statistics, national priorities, Primary/Lead Authority inspection plans) and local knowledge and priorities. Local Authorities should reserve proactive inspection for Category 'A' premises and consider the use of other non-inspection techniques for other categories of premises. In keeping with the Government's reforms of health and safety, there are no restrictions on reactive work.

Our key delivery **priorities** are:

- To inspect category A premises
- To investigate accidents
- To respond to complaints and enquires
- To respond to referrals from services or other organisations
- To scrutinise the city's high risk and high impact outdoors events
- Registering and ensuring tattooists comply with the city's bylaws.
- To partnership work with the fall prevention team to reduce the amount of preventable falls in care homes.

List of activities/sectors for proactive inspections by local authorities – specified in the national enforcement code.

No	Hazards	High Risk Sectors	High Risk Activities
1	Legionella infection	Premises with cooling towers/evaporative condensers	Lack of suitable legionella control measures
2	Explosion caused by leaking LPG	Premises (including caravan parks) with buried metal LPG pipework	Buried metal LPG pipe work For caravan parks to communal/amenity blocks only)

3	e.coli/cryptosporidium infection esp. in children	Open Farms/Animal Visitor Attractions	Lack of suitable microorganism control measures
4	Fatalities/injuries resulting from being struck by vehicles	Tyre fitters*/ MVR* (as part of Car Sales) High volume Warehousing/Distribution	Use of two-post vehicle lifts Workplace transport
5	Fatalities/injuries resulting from falls from height/ amputation and crushing injuries.	Industrial retail/wholesale premises e.g. steel stockholders, builders/timber merchants	Workplace transport/work at height/cutting machinery /lifting equipment.
6	Industrial diseases (occupational asthma/deafness)	MVR* Industrial retail/wholesale premises e.g. steel stockholders, builders/timber merchants	Use of Isocyanate paints Noise and dust.
7	Falls from height	High volume Warehousing/Distribution	work at height
8	Crowd control & injuries/fatalities to the public	Large scale public events/sports/leisure facilities e.g. motorised leisure pursuits including off road vehicles and track days	Inadequate consideration of public safety e.g. poor organisation and/or supervision of high speed or off-road vehicle movements
9	Carbon monoxide poisoning and gas explosion	Commercial catering premises using solid fuel cooking equipment	Lack of suitable ventilation and/or unsafe appliances.
10	Violence at work	Premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off-licences/care settings.	Lack of suitable security measures/procedures

Local Priorities:

- To scrutinise the city's high risk and high impact outdoors events

- Registering and ensuring tattooists comply with the city's bylaws.
- To partnership work with the fall prevention team to reduce the amount of preventable falls in care homes.

National Priorities:

- The national programme of work for the control of legionella
- Raising awareness on the duty to manage asbestos
- Animal contact at visitor attractions.
- Underground LPG
- Investigation of incidents and complaints
- Reactive work only in accordance with the Beauty sector strategy.

Our Achievements:– ‘Selling our story’ –Review of the 2013/14 Service plan

The team's achievements in 2013/14 were:

- Inspections of city's high risk businesses.
- Inspection of the city's cooling towers.
- Carried out 5 training sessions for BME take-away businesses working with partners – Police, business crime reduction partnership and partnership community safety team in respect of work place violence and hate crime reporting.
- Carried out 100 contacts with skin piercers to ensure they are compliant with the city's bylaws.
- Advice given to 10 registered scrap metal merchants to ensure they comply with changes in the Scrap Metal Dealers Act.
- Responded to 675 service requests.
- Reviewed 200 accident notifications and investigated as necessary.
- Scrutinised 250 new and varied licence applications & planning applications.
- Ensured that the City's outdoor events ran safely and included advice and assistance given to Pride, Marathon, Brighton Festival and Fringe Festival, Burning of the Clocks, the Brighton Festival, Fat Boy Slim concert at the Amex stadium, Shakedown, Paddle around the pier, Brighton Japan Festival
- Registered 300 tattooists at the Tattoo convention at the Hilton Metropole hotel , Ensured the tattooists complied with the bylaws and the event was run safety.
- Participating in the Sussex flexible warranting scheme and Major Incident Team.

- 12 messages of the month sent to over 130 businesses on mailing list
- Issued 1 simple Caution.
- Carried 4 fatality investigations and assisted the Coroner in her investigation.
- Promoted the 'Workplace Wellbeing Charter'
- Continue to promote the Free Health Check service for employers and employees.
- Businesses have received Health Checks for their workforce
- Improving health in the workplace by encouraging employers to support their staff
- Provided opportunities over the summer for physical activity for businesses after work e.g. volleyball, football, badminton, table tennis
- Small grants scheme (up to £500) - businesses received grants to deliver a programme that addressed the health and wellbeing of employees

Ensuring Quality

To ensure that the service we offer to residents and businesses is of high quality we will ensure that:

- All officers carrying out enforcement work are appropriately authorized, according to their ability, qualifications, expertise and experience.
- That officer's competence is continually assessed and that we support officers to develop their skills and widen their experience.
- That we will ask for feedback from business and residents on the quality of the service we provide and strive to continually improve
- That our work is audited externally by the British Standards Institute to ensure compliance with ISO9001 Quality Assurance.
- We will continue to participate in local peer reviews with neighbouring local authorities to ensure consistency and best practice.
- To continually update our data base to provide accurate details of business to help us communicate targeted health & safety messages effectively.
- We will participate in the Sussex Local Authority Health and Safety Liaison Group to share good practice, collaborate on training and discuss local, regional and national issues.

- To liaise with the HSE to ensure consistency in approach of enforcement.

Work plan and resources

Staff resources – 2.2 FTE Health & Safety Team – 2.25 FTE Occupational Health Team

Item	Resources	Timescales	How & Why	Outcome
Investigations of complaints				
To respond to approximately 350 requests for service	1 FTE	Throughout 2014/15	Respond to 95% of Service Requests within deadlines.	National Planning Priority Reactive referral work Performance Indicators. Percentage of Service Requests responded to within departmental deadlines. Outcome Maintain standards of customer service at a high level.
Skin Piercing Registration				
To ensure skin piercers and skin piercing premises comply with the city's bylaws.	0.3FTE	Throughout 2014/15	Assessment and registering of new skin piercers and visits to new skin piercing premises to ensure compliance with the city's bylaws.	National Planning Priority Reactive referral visits Performance Indicator No of visits carried out & assessments made. Outcomes Reduction of complaints about skin piercers
Investigation of Accidents				
To review all accident notifications and to investigate them all appropriately.	0.5 FTE	Throughout 2014/15	To review approximately 200 accident notifications and	National Planning Priority Reactive referral work Performance Indicator

			investigate accidents where they meet BHCC criteria for investigation	Number of accidents investigated. Outcome Reduce the level of work place accidents in local businesses
Supporting Small & Medium Sized Enterprises				
Send monthly health & safety messages promoting sensible risk management. & Updating website to provide resource for small and medium sized businesses	0.05 FTE	Throughout 2014/15	Collect email addresses from visits & self assessment risk rating questionnaires. Use BHCC email system to deliver messages. Update the website.	National Planning Priority Education and awareness Type of intervention Awareness raising and education Performance Indicator Number of messages sent Website updating Outcome Increased standards of employee and public health and safety business contacted. Sensible risk management promoted
Supporting the city's outdoor events				
Support the following community events <ul style="list-style-type: none"> • Brighton Marathon • Brighton Fringe Festival • Brighton Festival • Pride 	0.1 FTE	Throughout 2014/15	Scrutinising event management plans and providing advice for event organisers.	National Planning Priority & National Enforcement Code Reactive referral work Type of intervention Promoting best practice. Working with a sector

<ul style="list-style-type: none"> • Price Village Street Party • Shakedown 				Performance indicator Number of Event Management Plans Reviewed Outcome Increased safety at public community events. Forming links with communities
Partnership Working				
Participate in the Sussex Liaison Group (SHSLG) pan Sussex health & safety project	0.1 FTE	Througho ut the year 2014/15	Represent BHCC at SHSLG Participate in Sussex wide Health & Safety initiative	National Planning Priority Section 18 compliance - partnership working Performance indicator Number of meetings attended Project completed. Outcome Joined up approach to regional health & safety initiatives.
Alcohol Licensing				
To review new and varied alcohol licence applications make representations where appropriate.	0.1 FTE	Througho ut 2014/15	Scrutinise and comment on applications where appropriate. 150 licensing applications Visits to premises as necessary.	National Planning Priority Reactive referral work Performance indicator Numbers of licence reviewed. Outcome Proactive development of consistent and high standards of health and safety in proposed licensed premises.
Fall Prevention Project				

To partnership work with the fall prevention team to reduce the amount of preventable falls in care homes.	0.05FTE	Througho ut 2014/15	To share intelligence with the Falls prevention team and to promote fall prevention training with under engaged care homes.	National Planning Priority Reactive referral work Performance indicator Numbers of fall incidents shared with the falls prevention team and subsequent follow ups. Outcome Reduction in the numbers of preventative falls in care homes.
Healthy Work Places				
Healthy Workplaces Action Plan completed as part of One Planet Living section 10 Health & Happiness	0.2 FTE	Througho ut 2014/15	To promote the importance of workplace health and wellbeing to businesses	Public Health Outcome Framework Improving health in the workplace by encouraging employers to support their staff, and those moving into and out of the workforce, to lead healthier lives Type of intervention Advice and support Performance Indicator Number of businesses promoting employee health and wellbeing Outcome Increased health and wellbeing initiatives in the workplace
Promote the Workplace Wellbeing Charter (WWC) to businesses	0.1 FTE	Througho ut 2014/15	To promote the WWC to businesses	Workplace Wellbeing Charter Self assessment standards Type of intervention

				<p>Advice and support</p> <p>Performance Indicator Number of business engaged with the action plan</p> <p>Outcome Improved health & wellbeing in the workplace</p>
Work with businesses to attain WWC status	0.1 FTE	Throughout 2014/15	To promote the importance of workplace health and wellbeing to businesses	<p>Workplace Wellbeing Charter Self assessment standards</p> <p>Type of intervention Review work practices in light of WWC standards</p> <p>Performance Indicator Number of businesses signed up to the WWC</p> <p>Outcome Increased health & wellbeing initiatives</p>
Promote the Free NHS Health Check Service for employers and employees.	0.1 FTE	Throughout 2014/15		<p>NHS Health Checks Vascular risk assessment</p> <p>Type of intervention NHS Health Checks for employees</p> <p>Performance Indicator Number of health checks delivered</p> <p>Outcome Improved health & wellbeing and reduced sickness absence</p>
Promote Small Grants scheme	0.1 FTE	Throughout	Promoting the small	Healthy City Partnership

available to businesses		ut 2014/15	grants scheme to businesses	Type of intervention Support and advice around health and wellbeing initiatives Performance Indicator Number of grants awarded Outcome Improved employee health and wellbeing
Support Businesses in the delivery of health promoting activities that address employee health and wellbeing	0.1 FTE	Througho ut 2014/15	Provide advice and support to businesses around workplace health and wellbeing	Healthy City Partnership Type of intervention Support and advice Performance Indicator Number of business engaged with the action plan Outcome Increased health & wellbeing initiatives
Organise Beach Volleyball, football, badminton and table tennis tournaments through summer months	0.1 FTE	Througho ut 2014	To promote the importance of physical activity in the workplace	Healthy City Partnership Type of intervention Physical activity Performance Indicator Number of business taking part Outcome Increased physical activity

Subject:	Brighton and Hove 20mph Limit Phase 2 – Submissions made in response to Speed Limit Orders		
Date of Meeting:	04 March 2013		
Report of:	Executive Director of Environment Development and Housing		
Contact Officer:	Name:	Emma Sheridan	Tel: 29-3862
	Email:	Emma.sheridan@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE.**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 The purpose of this report is to address comments and objections relating to the draft Speed Limit Orders (SLO). The orders outline the proposed introduction of a 20mph speed limit in the phase 2 area of Brighton and Hove.

2. RECOMMENDATIONS:

- 2.1 That, having taken account of all duly made representations and objections, the Environment Transport & Sustainability Committee approves as advertised the following orders

- Brighton & Hove (Phase 2, Area 1) (20mph Speed Limit) Order 20** (TRO-3a-2014)
- Brighton & Hove (Phase 2, Area 2) (20mph Speed Limit) Order 20** (TRO-3b-2014)
- Brighton & Hove (Phase 2, Area 3) (20mph Speed Limit) Order 20** (TRO-3c-2014)
With the following amendment:
That Copse Hill be removed from the Order for the reason set out in paragraphs 4.78 - 4.79
- Brighton & Hove (Phase 2, Area 4) (20mph Speed Limit) Order 20** (TRO-3d-2014)
- Brighton & Hove (Phase 2, Area 5) (20mph Speed Limit) Order 20** (TRO-3e-2014)
- Brighton & Hove (Phase 2, Area 6) (20mph Speed Limit) Order 20** (TRO-3f-2014)
- Brighton & Hove (Phase 2, Area 7) (20mph Speed Limit) Order 20** (TRO-3g-2014)
- Brighton & Hove (Phase 2, Area 8) (20mph Speed Limit) Order 20** (TRO-3h-2014)
- Brighton & Hove (Phase 2, Area 9) (20mph Speed Limit) Order 20** (TRO-3i-2014)

- Brighton & Hove (Coldean Lane) (30mph Speed Limit) Order 201* (TRO-3j-2014)
- 2.2 That the Committee authorises officers to proceed with advertising a formal Speed limit Order (SLO) to reduce to 20mph the speed limit on Dartmouth Crescent for the reasons outlined in paragraphs 4.41 – 4.44
 - 2.3 That the Committee authorises officers to proceed with advertising a formal Speed limit Order (SLO) to reduce to 20mph the speed limit on Surrenden Road for the reasons outlined in paragraphs 4.41-4.44
 - 2.4 That the Committee authorises officers to proceed with advertising a formal Speed limit Order (SLO) to reduce to 20mph the speed limit on Preston Drove for the reasons outlined in paragraphs 4.41 – 4.44
 - 2.5 That the Committee authorises officers to proceed with advertising a formal Speed limit Order (SLO) to reduce to 20mph the speed limit on Stanford Avenue for the reasons outlined in paragraphs 4.41-4.44
 - 2.6 That the Committee note the forward programme for the 20mph programme as outlined in paragraph 6.5
 - 2.7 That the Committee instructs officers to continue a comprehensive monitoring and evaluation programme to accompany and follow the implementation of the 20mph speed limits and to bring a report to Committee should such monitoring indicate that the introduction of the reduced speed limit has had a significant negative impact in line with objections raised

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 In May 2010, following an investigation into 20mph speed limits and zones by the Environment and Community Safety Overview and Scrutiny Committee (ECSOSC), the panel produced a report containing 15 recommendations (see Background Document 1). In broad terms, the main recommendation was the wider implementation of 20mph speed limits in residential areas and on the roads outside schools, routes to schools, roads outside parks and playgrounds, sports and leisure facilities, community buildings, older people's care homes, local shops and on roads in busy shopping areas.
- 3.2 In October 2011, the Department for Transport (DfT) set out a new policy framework for the country's traffic sign systems. Included in this were provisions making it easier for councils to introduce 20mph schemes. This takes the form of a reduction in the need for physical traffic calming measures in 20mph zones by expanding the list of permitted traffic calming measures to include repeater signs and reducing the need for road humps and chicanes.
- 3.3 An outline proposal for the phased introduction of 20mph speed restrictions across the City was considered at the Environment Transport & Sustainability Cabinet Member Meeting in May 2012 where the principles of the proposed implementation programme (see Background Document 4) were agreed. Permission was granted to undertake city wide stakeholder and public

consultation, preparatory research, surveys and street character assessments.

- 3.4 On 15th January 2013 the Brighton & Hove City Council Transport Committee granted approval for the first phase of implementation of 20mph speed limit programme in central Brighton and Hove (see Background Document 6). The limit came into force on 8th April 2013.
- 3.5 On 11th December 2013 the Brighton & Hove City Council Environment, Transport & Sustainability Committee granted approval for the advertisement of Speed Limit Orders for the Phase 2 area.

4 COMMUNITY ENGAGEMENT & CONSULTATION

Petitions

- 4.1 A petition signed by 742 people was presented to full Council in January 2014 asking Brighton and Hove City Council “To reconsider the decision not to reduce the speed limit on Preston Drove, Stanford Avenue and Surrenden Road to 20mph” Paragraph 4.44 below outlines the officer response to and recommendations linked to this petition.

Public Consultation

- 4.2 Initial city wide public consultation on 20mph limits took place between 17th June and 10th August 2012. A total of 3689 people responded as part of the consultation with 55 % in favour and 44.5% against the proposal to introduce 20mph limits. Detailed results from this consultation are recorded in Background Document 5.
- 4.3 Speed Limit Orders for the Phase 1 area of central Brighton and Hove were advertised between 13th December 2012 and 3rd January 2013. Responses to the advertisement and officers responses to the issues raised are recorded in Background Document 6.
- 4.4 Public consultation on the Phase 2 area took place between 13th August and 4th October 2013. A total of 14,952 people responded as part of the consultation. A majority (51%) of people responded that they supported 20mph on their own street. This increased to 53% when only the responses from those living within the Phase 2 area were considered. Detailed results from this consultation are reported in Background Document 7.
- 4.5 The proposals for the Phase 2 areas were amended by officers in light of the results of public consultation such that under the amended proposals, 59% of people living in the Phase 2 area would have the speed limit they wanted for the street on which they lived.
- 4.6 The Phase 2 proposals were further amended by the Environment Transport & Sustainability Committee, in December 2013, to remove a small number of individual roads (Surrenden Road, Preston Drove, Stanford Avenue and Portland Road) and the residential area of Hollingbury.

Advertisement of Draft Speed Limit Orders

- 4.7 The draft Speed Limit Orders (SLOs) for the Phase 2 20mph programme area were advertised on 24th January 2014 with the closing date for comments and objections being 14th February 2014.
- 4.8 The Ward Councillors for the areas were consulted, as were the Bus and Taxi Companies operating within the City and the statutory consultees such as the Emergency Services. The notices were published in The Argus newspaper and were available to view at the City Direct Offices at Bartholomew House and Hove Town Hall. The documents were available to view and respond to directly via the Council website. In addition, notification and copies of the orders were distributed by email to all those who had provided contact details for further information when responding to the public consultation on the Phase 2 area.

Stakeholder Meetings/Correspondence

- 4.9 A meeting was held with senior officers of **Sussex Police** to discuss the 20mph programme, both implementation to date and future proposals, on 5th February 2014.
- 4.10 Following the meeting, a letter was received from Sussex Police in response to the advertisement of the orders. The letter took the unusual step of stating that Sussex Police have no objections to the proposals (normally where the Police have no objections they simply do not respond). The letter confirms that it is the opinion of Sussex Police that:
- The Phase 2 proposals do not constitute a blanket approach and have been tailored to suit each of the areas concerned
 - They are reassured of the post monitoring programme and that it will be used to evaluate the success of the scheme and identify further measures where they might be needed
 - They have no objections to the Phase 2 20mph proposals nor to the reduction of speed on Coldean Lane from 40mph to 30mph.
- 4.11 A letter was received from Brighton and Hove Bus and Coach Company in response to the advertisement of the Orders. The letter confirmed that they were able to support the proposals as a result of the retention of existing limits on a number of roads. These roads were; Portland Road, New Church Road, Shirley Drive, Dyke Road, Dyke Road Avenue, London Road, Preston Road, Braybon Avenue, Winfield Avenue, Carden Avenue, Carden Hill, Ditchling Road (north of Fiveways), Lewes Road and Surrenden Road.
- 4.12 Further discussions took place with Brighton and Hove Bus and Coach Company on 19th February 2014 specifically relating to Surrenden Road. Following these discussions, the Company's Managing Director confirmed that they "are satisfied that the exemption for Surrenden Road can be lost without significant detriment to the provision of bus services in the area." They further confirmed that they had not specified any issues on either Preston Drive or Stanford Avenue and that as such, they had no objections to the speed limits on these roads being reduced to 20mph.
- 4.13 A letter was received from Bricycles and CTC in response to the advertisement of orders. The letter confirmed support for the 20mph Speed limit Orders on the

grounds of the “overwhelming evidence” that they would reduce road danger for cyclists and pedestrians. The letter objected to the exclusion of individual streets citing the additional costs this would incur and the confusion this would cause. In particular Bricycles objected to the exclusion of:

- Portland Road (a busy shopping street with high numbers of pedestrians and cyclists and a poor safety record)
- Road around public parks including Hove Park and Hove Recreation Ground
- The Westdene residential area
- Surrenden Road, Preston Drove and Stanford Avenue (due to their proximity to local schools and parks, that the Bus Company did not request their exclusion, and the strong local support for the limit to be lowered on these roads)
- The residential roads of Patcham and Hollingbury
- Ditchling Road north of Fiveways and the Fiveways junction itself (the location of a large secondary school)

4.14 The issues raised and responses to these exclusions are considered in paragraphs 4.27 - 4.44 of this report.

4.15 A response was received from The Campaign for Better Transport (East Sussex) in support of the proposals. The response in particular referenced the statement from the Commission for Integrated Transport regards the “fundamental” role of 20mph speed limits in the growth of cycling and walking and the health benefits that would be gained particularly for older people.

4.16 A letter was received from the Freight Transport Association in response to the advertisement of the Orders. The letter did not object directly to the proposals contained within the Orders but rather provided details of the FTAs general views on 20mph speed limits in general. The letter stated that the FTA believes that:

- 20mph schemes should not be applied in a simplistic or blanket fashion but should be targeted
- Un-enforcement of 20mph limits will result in speeds not reducing and greater speed differentials
- Where speeds are slowed across an area that this will increase costs for the logistics industry and will not provide benefits in terms of fuel use or local emissions
- There should be a full safety case for all measures proposed
- 20mph limits should be targeted to areas of concern and set to specific times of the day
- Full access to main roads must not be compromised

4.16 In response to the issues raised by the FTA, it is noted that the 20mph programme in the city:

- Has not been applied in a simplistic or blanket fashion, and that this has been recognised independently by not only Sussex Police (see paragraph 4.10) but also by the Advertising Standards Agency in a recent ruling (see appendix 2).
- Has the support of Sussex Police who are working in partnership with Council officers to ensure appropriate interventions are in place to secure compliance

- Has investigated and continues to investigate the impact of the programme on air quality
 - Understands and has considered carefully the safety and other motivating factors for the measures that are proposed and implemented
 - Has investigated the issue of part time speed limits fully and found this not to be a feasible or permitted option
 - Has maintained access to main arterials routes, at their existing limits
 - Has and will continue to be implemented in line with the Councils policies on the Control of Heavy Goods Vehicles.
- 4.17 The Principal Transport Planner offered to attend the Taxi Forum on 12th February 2014 to discuss the Phase 2 SLOs. No response was received to the offer made. No written or other response was received from the taxi trade to the advertised SLOs for Phase 2. .

Individual responses to the Speed Limit Orders

- 4.18 In total, correspondence was received from 204 individuals in response to the 10 SLOs (hard copies of the responses are available to view in the Members Room and a summary is provided as Appendix 1)
- 4.19 The correspondence has been reviewed in order to understand the various reasons behind the support for, or objections to, the proposals. A number of submissions related to more than one issue. The number of times each issue has arisen is indicated below along with a response to each objection raised.
- 4.20 The majority of reasons provided for those supporting and opposing the proposals were the same as those raised during the public consultation on Phase 2 and previously with the advertisement of Speed Limit Orders for the Phase 1 area and the initial public consultation on the 20mph programme. These issues were addressed at length in the Committee Reports presented to and debated by the Transport Committee in January 2013 (Background Document 6) and by the Environment, Transport & Sustainability Committee in December 2013 (Background Document 7). Members are referred to Background document 6 and 7 for the detailed responses in relation to these issues.

This report addresses in detail those issues which are new, those that are specific to the Phase 2 Speed Limit Orders and those where new evidence has become available.

Support for the Proposals

- 4.21 **50** responses were received giving complete support to the proposals. In addition to stating general support for 20mph limits in principle, these submissions cited the following reasons for their support:
- Improved safety (particularly for children) (25 respondents)
 - Will encourage more walking and cycling (6 respondents)
 - Will create a more pleasant environment (6 respondents)
 - Will improve traffic flow (3 respondents)
 - Will reduce pollution and noise (6 respondents)
 - The limit was appropriate as areas were near or on routes to schools, in residential/family areas (31 respondents)
 - A feeling that current speeds were too fast (18 respondents)

Particular roads mentioned where the 20mph limit was supported were; Carden Avenue (1), Dyke Road Drive (4), The Drove (1), Hove Park Road (1), St Leonards Road (1), Peacock Lane (1), Freshfield Road (4), Balfour Road (1), Matlock Road (2), The Drove (10), Hove Park Road (6), Elrington Road (3), Radinden Manor Road (2), Ditchling Road (1), Southdown Road (1), Lloyd Road (2), Orpen Road (2), Sutherland Road (1), Evelyn Terrace (1), Tivoli Road (1)

Support and Objection to the Proposals

- 4.22 **90** responses were received from residents who expressed support for the 20mph limits but also objected to the exclusion from the Orders of specific roads.
- 4.23 1 resident of Dartmouth Crescent objected to the fact that his road was not named in the list of streets advertised under Brighton & Hove (Phase 2, Area 8) (20mph Speed Limit) Order 20** (TRO-3h-2014)
- 4.24 Dartmouth Crescent should have been listed in the draft orders. It is, therefore, recommended that this administrative error be corrected by permission being given to formally advertise an order for this street.
- 4.25 1 respondent requested the addition of the northern section of Freshfield Road under Brighton & Hove (Phase 2, Area 8) (20mph Speed Limit) Order 20** (TRO-3i-2014) giving as a reason the use of this road at weekends when a car boot sale takes place at the Racecourse
- 4.26 This section of road was identified early in the investigative stages of the Phase as a road where the street character would not encourage self enforcement of a 20mph limit without extensive infrastructure measures being put in place, existing traffic speeds on this road supported this. It is not considered appropriate therefore to propose a reduction of the speed limit on this section of road.
- 4.27 1 resident of Hill Drive objected to the fact that their roads was not included in the list of streets advertised under Brighton & Hove (Phase 2, Area 2) (20mph Speed Limit) Order 20** (TRO-3b-2014)
- 4.28 As outlined in Background Document 7 paragraphs 4.49 – 4.50, it was very clear in the public consultation that the majority of respondents in this area did not wish to see 20mph limits on their streets. It is understood that this will be disappointing for those living in the area who wished to see 20mph introduced. Given that there was not a demonstrable level of local support in this residential area, it is however, considered unlikely that a lower limit could easily become self enforcing. Officers will however, continue to include the area in ongoing monitoring and should the level of public support for 20mph alter in the future a report could be brought to the committee on this.
- 4.29 6 respondents (4 resident in the West Hove area) objected to the fact that Portland Road was not included in the list of streets advertised under Brighton & Hove (Phase 2, Area 1) (20mph Speed Limit) Order 20** (TRO-3a-2014. Reasons provided were the dangerous nature of road traffic on the street, its casualty history, the fact that it was a busy shopping street with a local school and high levels of pedestrians and cyclists and the existence of 2 alternative, parallel routes in Old Shoreham Road and New Church Road to be used by road traffic.

- 4.30 The officer recommendation, as outlined in the Committee Report presented to the ETS Committee in December 2013 (Background Document 7: Paragraph 4.48), was that Portland Road be reduced to 20mph. However, at that meeting the Committee requested officers to undertake further analysis and monitoring of Portland Road. This is currently underway and a report on this street will be brought to a future ETS committee for consideration.
- 4.31 1 resident of New Church Road objected to the fact that their street was not included in the list of streets advertised under Brighton & Hove (Phase 2, Area 1) (20mph Speed Limit) Order 20**(TRO-3a-2014)
- 4.32 New Church Road was identified early in the investigative stages of Phase 1 as a road where the street character would not encourage self enforcement of a 20mph limit without extensive infrastructure measures being put in place, existing traffic speeds on this road supported this. In addition it was very clear in the public consultation that the majority of respondents in this area, including the majority of respondents who were resident on the street itself, did not wish to see 20mph limits on New Church Road. It is understood that this will be disappointing for those living in the area who may have wished to see 20mph introduced, however, given that there was not a demonstrable level of local support, it is considered unlikely particularly given investigative findings about the road, that a lower limit could easily become self enforcing. Officers will however, continue to include the area in ongoing monitoring and should the level of public support for 20mph alter in the future a report could be brought to the committee on this.
- 4.33 4 respondents (1 resident in Westdene) objected to the majority of streets in the Westdene area not being included in the list of streets advertised under Brighton & Hove (Phase 2, Area 2) (20mph Speed Limit) Order 20**(TRO-3c-2014)
- 4.34 As outlined in Background Document 7 paragraphs 4.51 – 4.53, it was very clear in the public consultation that the majority of respondents in this area did not wish to see 20mph limits on their streets. It is understood that this will be disappointing for those living in the area who wished to see 20mph introduced. Given that there was not a demonstrable level of local support in this residential area, it is however, considered unlikely that a lower limit could easily become self enforcing. Officers will continue to include the area in ongoing monitoring and should the level of public support for 20mph alter in the future a report could be brought to the committee on this.
- 4.35 6 respondents (3 resident in the area) objected to the streets in Goldstone Valley, in particular Goldstone Crescent and Shirley Drive, not being included in the list of streets advertised under Brighton & Hove (Phase 2, Area 2) (20mph Speed Limit) Order 20**(TRO-3b-2014)
- 4.36 As outlined in Background Document 7 paragraphs 4.49 – 4.50, it was very clear in the public consultation that the majority of respondents in this area did not wish to see 20mph limits on their streets. It is understood that this will be disappointing for those living in the area and those who use the park located here, who wished to see 20mph introduced. Given that there was not a demonstrable level of local support in this residential area, it is however, considered unlikely that a lower limit could easily become self enforcing. In addition Shirley Drive was a particular

road of concern for the bus company. Officers will continue to include the area in ongoing monitoring and should the level of public support for 20mph alter in the future a report could be brought to the committee on this.

- 4.37 13 respondents (5 resident in the Patcham and Hollingbury Area) objected to exclusion of residential streets within the Patcham and Hollingbury area in particular Carden Hill and Braybon Avenue from the list of streets advertised under Brighton & Hove (Phase 2, Area 5) (20mph Speed Limit) Order 20**(TRO-3e-2014). Particular reasons provided for this included the large number of school children, families and older people resident in the area.
- 4.38 The officer recommendation, as outlined in the Committee Report presented to the ETS Committee in December 2013 (Background Document 7: Paragraph 4.55) was that further roads in this area be reduced to 20mph. The Committee took a decision at that meeting to defer any lowering of speed limits in this area until such time as a more demonstrable level of support for such a move could be evidenced. It is proposed, therefore, that officers will continue to include the area in ongoing monitoring. Should the level of public support for 20mph alter in the future, a report could be brought to the committee on this. It is understood that this will be disappointing for those living in the area who wished to see 20mph introduced.
- 4.39 7 respondents (3 resident in the local area) objected to the retention of existing speed limits on Ditchling Road north of Fiveways and the Fiveways Junction itself. The principle reason for this was the location of the Vardean Campus.
- 4.40 This section of Ditchling Road was identified early in the investigative stages of Phase 2 as a road where self enforcement of a 20mph limit without extensive infrastructure measures being put in place may be difficult to achieve. Existing traffic speeds on this road supported this. Officers will, however, continue to include the area in ongoing monitoring and should the level of public support for 20mph on this section increase in demand the suitability of this section could be reviewed with the potential for a report be brought to the committee on this. It should be noted however, that it would be expected that any further reductions in speed limit along this road would be opposed by the Bus Company.
- 4.41 A large number of respondents objected to the exclusion three specific roads in the Preston area – namely the full length of Surrenden Road (69 respondents) , Preston Drove (73 respondents) and Stanford Avenue (72 respondents) (from Brighton & Hove (Phase 2, Area 4) (20mph Speed Limit) Order 20**(TRO-3d-2014) and Brighton & Hove (Phase 2, Area 5) (20mph Speed Limit) Order 20**(TRO-3e-2014).
- 4.42 The principle reason for the objections was the location of a large number of schools on this road and on the surrounding roads resulting in a large number of school children and families travelling along this residential street. It was noted that only a small number of buses used the area and its exclusion created an inconsistency of speed limit in the local area that could see speeds increase dangerously. The point was also made that the exclusion of these streets would greatly increase the signage costs of implementation in this area. It is important to note that of those who objected to the exclusion of these roads the majority

where resident upon them or on adjoining roads. The introduction of a 20mph limit on these roads has the support of local ward councillors also.

- 4.43 Brighton and Hove Bus and Coach Company have confirmed as stated in paragraph 4.12 of this report that they would not now object to a 20mph limit on Surrenden Road and that they had never had any objection to the lower limit on Preston Drove or Stanford Avenue.

- 4.44 The officer recommendation, as outlined in the Committee Report presented to the ETS Committee in December 2013 (Background Document 7: Paragraph 4.54), was that Surrenden Road, Preston Drove and Stanford Avenue be reduced to 20mph. In view of the high number of objections (including the petition referred to at 4.1 above) and the views of the bus company, Committee authorization is sought for officers to proceed with advertising a formal Speed limit Order (SLO) to reduce to 20mph the speed limit on the full length of these roads.

Objections to the Proposals

- 4.45 63 responses were received in complete objection to the proposals.

20mph Limits Not Necessary

- 4.46 22 respondents objects to the orders in general stating that the lower limits were unnecessary either because the existing limits were more than appropriate for the roads (specific roads mentioned by individual respondents included Bear Road, Eastern Road, Freshfield Road, Whitehawk Road, Arundel Road, Whitehawk Way and Ditchling road) or because it was impossible to exceed 20mph in the city. It was not uncommon for individual objectors to include both statements within their objection.
- 4.47 There are numerous documented reasons why Local Authorities undertake the investigation, proposal and where appropriate implementation of 20mph speed limits which have been outlined and discussed in all the Background Documents listed. The most basic is that Department of Transport guidance on speed limit recommends it, but more meaningful reasons are found in the safety improvements that they can bring in terms of reductions in collisions and the severity of casualties and the sense of place that can be returned to streets. Brighton and Hove has got concerning levels of collisions and casualties in some areas of the city that slowing down traffic speeds should have a significant impact on reducing. In addition the city has a population who increasingly wish to see their neighbourhood streets as places rather than thoroughfares. Improving the city streets so that they are more pleasant, safer places to live, work and visit is considered a worthwhile ambition. The reasons behind the inclusion of particular areas and individual roads is covered in detail in Background document 7.

Lack of Evidence/Monitoring of success of Phase 1

- 4.47 13 respondents objected to the Orders on the grounds that the first phase of the 20mph programme was not working or achieving its aims. This included statements that the 20mph limit, where it had already been introduced, was being ignored by drivers, that speeds had not reduced, that the lower limit had made roads more dangerous (1 respondent particularly mentioned the safety of motorcyclists and 6 suggested that it was encouraging pedestrians to cross

roads more confidently and that this was dangerous) and that the objector simply did not believe the Council had any evidence against which to gauge success of the scheme.

4.48 Details of casualty and collision data within in the Phase 1 area was presented at the December ETS Committee (Background Document 7: paragraph 4.35). Further collision and casualty data has become available. Such figures can be provided for the first 8 months of the 20mph becoming operational in the Phase 1 area. As can be seen from Figure 1 below, within the Phase 1 area there have been no fatal collisions since the implementation of the 20mph limit and overall there has been a decrease in the number of collisions and in the number of casualties based on 8 months of 2013 data compared with the 3 year average for the same months in the previous three years.

4.49 As was the case when earlier figures were presented to the Committee in December 2013, it should be noted that the figures here can only be considered indicative at this stage and in order to have truly statistically robust data it is preferable to have 3 full years of monitoring data as this will ensure that findings are not skewed by seasonal variations or unique/one off events. However, these interim results continue to be in line with the positive results seen by other cities and are an encouraging indication of success even at this early stage.

4.50 Figure 1: Casualty Figures 8th April to 7th December

All Collisions by Severity			
	3 yr average 2010 - 2012		2013
Fatal	0.3		0
Serious	36.0		34
Slight	187.7		157
TOTAL	224.0		191
All Casualties			
	3 yr average		2013
Fatal	0.3		0
Serious	36.0		34
Slight	227.3		196
TOTAL	263.7		230

4.51 With specific regard to Motorcycle safety within the Phase 1 area it is encouraging also that interim data to date has shown a decrease in both collisions and casualties for this group. Again though it should be noted that data at this stage can be regarded as indicative only.

Air Quality, Pollution and Emissions

4.52 21 objections stated that the lower speed limit would result in increased pollution and a deterioration of air quality and included assertions that cars would need to be driven in lower gears and that fuel consumption would be increased.

4.53 It remains the case that evidence is limited on this topic and this issue has been explored in background doc 7 paragraphs: 4.37 – 4.39 and background

document 6 paragraph 4.26 – 4.28. In summary, the most recent available research on this topic, undertaken by Imperial College London, found that “it would be incorrect to assume that 20mph speed restrictions would be detrimental to air quality...[and]... air quality is unlikely to be made worse as a result of 20mph speed limits.

- 4.54 In addition it remains the case that a key aim of the proposals is to create streets that are more attractive for walking and cycling. The potential increase in active travel modes could lead to a reduction in car journeys, particularly those which are short and local in nature, which are the most polluting.

Impact on Journey Times/Increased Congestion

- 4.55 15 objections were made on the grounds that the scheme would cause increased congestion with 5 stating there would be increased journey times and a negative impact on bus journey times.
- 4.56 This issue has been addressed in detail in Background Document 6: Paragraphs 4.15 – 4.21. It should also be noted that Brighton and Hove Bus and Coach Company have supported the Phase 2 proposals.

Legality and enforceability of the 20mph limit

- 4.57 11 objections were made on the basis that the new limit has been or would be unenforceable/unenforced and that drivers were not and would not in the future comply with it. In addition 2 of those who expressed support for the proposals indicated that enforcement would be required or was something they were concerned about.
- 4.58 Under Section 84 of the Road Traffic Regulation Act 1984, Local Authorities have the power to set speed limits on their roads, including limits of 20mph. Where such limits are signed and have been made under the correct Speed Limit Orders, they are legal and they are enforceable.
- 4.59 Guidance from the Association of Chief Police Officers (ACPO) states clearly that “Enforcement will be considered in all clearly posted limits”,
- 4.60 Officers from the Road Safety Team have undertaken joint speed monitoring interventions with local police officers and further activities are currently being planned for the coming months.
- 4.61 In order to educate drivers in the city of the legality of the limit, a communications programme will undertaken, in partnership with Sussex Police and the Sussex Safer Roads Partnership across the city to ensure that this misconception/ misunderstanding is addressed. It is expected that this will begin in the Spring.
- 4.62 Monitoring from the first months of the Phase 1 20mph limit shows that driver speeds decreased on 74% of roads and of those roads that had seen an increase a number of those maintained average speeds below 20mph. Whilst it is accepted that these results are interim only at this stage, they do provide encouraging signs that drivers in the city are, in the main, reducing their speeds in line with the lower limits.

- 4.63 Council Officers will continue to monitor compliance with the 20mph limits wherever they are introduced. Evidence will be used to identify areas of non compliance and where necessary further interventions will be considered to assist drivers with compliance. Whilst it is the aim of this programme that through driver education and well implemented limits that compliance with the lower limit can be achieved without the “stick” of enforcement, enforcement remains an available tool to be used in the city.
- 4.64 Officers and Councillor Davey have met with Senior Sussex Police Roads Policing Unit officers to discuss this issue and continue to work in partnership to ensure that all avenues of speed management are available within the city, this includes but is not limited to education and enforcement.

Waste of Money

- 4.65 26 objections stated the opinion that the programme represented a waste money and that funds would be better spent elsewhere.
- 4.66 The funding for the 20mph programme is capital funding allocated via the Department for Transport Local Transport Plan and cannot be used for revenue expenses such as social services or refuse collection as was proposed by a number of objectors.
- 4.67 Officers continue to consider that the proposals are cost effective and are significantly less expensive than the implementation of more geographically limited 20mph zones. The Department for Transport provides financial estimates of the average value of the prevention of reported road casualties and collisions. The average value of collision saving to society of just one collision is over 71k and it is at 50k on average per casualty (rising to almost 1.7 million for a fatal casualty), bearing this in mind it is considered that the casualty saving potential of 20mph limits more than justifies the relatively small expense of the programme.
- 4.68 It should also be noted that money spent under the 20mph programme on investigative and monitoring stages is providing data that is being used not just for this programme but by a wide range of services within the Council through adopting the philosophy of “Collect Once – Use Many.”

Lack of mandate/Majority do not want 20mph limits

- 4.69 9 respondents objected claiming that they did not vote for lower limits, that the consultation had resulted in the majority rejecting 20mph and that they were unaware of anyone who supported it.
- 4.70 The report on the consultation results presented to and debated by the ETS Committee in December 2013 clearly showed that lower limits have been advertised where they were supported by local residents and were not progressed where a majority were evidenced to be opposed (for example in the Goldstone Valley and Westdene Areas of the city). The consultation did however show that whilst there was a significant amount of support for 20mph limits, it also highlighted the fact that some people are strongly opposed to the scheme and the principles that underlie it.

Negative Impact on local business

- 4.71 9 objections stated or implied that the scheme would have a negative economic impact on the area and the city as a whole, particularly with regards to attracting tourism.
- 4.72 There remains, as reported in Background Document 6, paragraph 4.45, no evidence that this would be the case. In contrast there is a growing evidence base that shows that creating attractive, safer environments for those who wish to walk can attract visitors to an area. For example improvements in Coventry City Centre which included 20mph speed limits saw a 25 percent increase in Saturday footfall and in London research has shown that those travelling on foot to local town centres spend 147 more per month than those travelling by car. Tourists to the city are often unfamiliar with road layouts and the direction of travel of traffic. As such they are potentially more vulnerable and could benefit from the improved safety of slower road speeds.

Signage and Road Markings

- 4.73 3 objections were the result of respondents not wishing to see excessive signage and road markings on their streets.
- 4.74 The Council is bound by the guidance set out by the Department for Transport, Traffic Signs and Regulations General Directions, which sets out where and what type of signage is required on the highway. Signage of any new speed limit is important so that drivers and other road users have the information they need to travel safely and within the law.
- 4.75 As part of the implementation of Phase 2, just as was undertaken in Phase 1, a de-cluttering exercise will accompany the implementation so that any redundant signage is removed at the same time.
- 4.76 In addition, and in direct response to requests that were made during the public consultation, a number of smaller roads and cul de sacs, particularly along the seafront were removed from the orders as it was considered that signage would be neither necessary nor wanted at those locations. It may be that some additional, similar roads need to be considered and officers will liaise closely with local residents where this issue has been highlighted (for example Belgrave Place was mentioned by 1 respondent)
- 4.77 Wherever possible, and within the required regulations, signage for the scheme will be sympathetic to the area but it must be implemented correctly to ensure that the speed limit can be self enforcing. The approach that officers have adopted to signage has been developed with and is supported by Sussex Police.

Error in the orders – Copse Hill

- 4.78 1 resident of Copse Hill (Westdene) objected to the fact that his road had been named in the list of streets advertised under Brighton & Hove (Phase 2, Area 3) (20mph Speed Limit) Order 20** (TRO-3c-2014)
- 4.24 Copse Hill should not have been listed in the draft orders. It was shown in the plans accompanying the orders as retaining its existing limits. It is, therefore, recommended that this administrative error be corrected by removing it from the Orders before they are sealed.

5. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 5.1 It is an option to retain existing limits on Surrenden Road, Preston Drove and Stanford Avenue. To do so however would not only be contrary to the expressed wishes of local residents and of local ward Councillors, it would also add significant costs to the implementation of the scheme caused by increased signage costs. For this reason it is recommended that the Committee accept the initial officer recommendations for these roads, made again in this report, and approve the advertisement of formal Speed Limit Orders for these roads.

6. CONCLUSION

- 6.1 The majority of those who responded to the Phase 2 Speed Limit Orders supported the introduction of 20mph limits in this area with the majority of objections relating to the exclusion, rather than the inclusion, of specific roads.
- 6.2 Strong public opinion exists amongst residents of the Preston area for speed limits on Surrenden Road, Preston Drove and Stanford Avenue to be reduced to 20mph. 20mph limits on these roads are not opposed by Brighton and Hove Bus and Coach Company.
- 6.3 Should approval be given to advertise the additional Speed Limit Orders requested in recommendations 2.1 to 2.5, no final decision on these roads will be made until the responses to the orders have been reviewed and reported back to the Environment, Transport and Sustainability Committee. It is expected that this could happen in April 2014.
- 6.4 The benefits of 20mph speed limits continue to be recognised nationally and internationally and ongoing interim monitoring of the Phase 1 area of Central Brighton & Hove continues to indicate that these benefits are starting to be realised in the city after 8 months. There remains, however, a continued need for the investigation, monitoring and evaluation of speed limits across the city.
- 6.5 The next steps, subject to the approval of this reports' recommendations are proposed to be:
- February 2014: Complete Street Assessments of Phase 3 Areas
 - March 2014: Advertisement of remaining Phase 2 Speed Limit Orders
 - March 2014: Commence implementation of Phase 2 Areas
 - March 2014: Traffic Surveys to establish existing speeds in Phase 3 areas
 - April 2014: Report to Committee on SLO objections
 - April 2014: Develop consultation proposals for Phase 3 Area
 - April 2014: undertake first year monitoring of Phase 1 area
 - Spring/Summer 2014: Public consultation on Phase 3 Areas
 - November 2014: Report to Committee on First Year results of Phase 1 and present results of Phase 3 Consultation

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 Capital: The sum of £0.350million has been allocated for the introduction of 20mph speed reductions in the city, as part of the Local Transport Plan Capital Budget for 2013-14.
- 7.2 Ongoing maintenance of the scheme will be funded from within existing Transport budgets.

Finance Officer Consulted: Jeff Coates

Date: 21/02/2014

Legal Implications:

- 7.3 As stated in the body of the report, section 84 of Road Traffic Regulation Act 1984 allows traffic authorities to set speed limits. The Council's powers and duties under the Act must be exercised to secure the expeditious, convenient and safe movement of all types of traffic including cyclists and pedestrians. As far as is practicable, the Council should have regard to any implications in relation to: access to premises; the effect on amenities; the Council's air quality strategy; facilitating the passage of public services vehicles; securing the safety and convenience of users; any other matters that appear relevant to the Council.
- 7.4 The Council has to follow the rules on consultation set out by the government and the courts. The Council must ensure that the consultation process is carried out at a time when proposals are still at their formative stage, that sufficient reasons and adequate time must be given to allow intelligent consideration and responses and that results are properly taken into account in finalising the proposals.
- 7.5 After the proposals are formally advertised, the Council can, in the light of objections and other representations received, decide to re-consult either widely or specifically when it believes that it would be appropriate before deciding the final composition of any associated orders. Where there are unresolved objections to the Speed Limit Orders, then the matter is required to return to Environment, Transport & Sustainability Committee for a decision.

Lawyer Consulted:

Name Hilary Woodward

Date: 21/2/14

Equalities Implications:

- 7.6 The scheme should improve conditions for vulnerable road users and has the potential to ease community severance by aiding the development of healthy and sustainable places and communities. In reducing the perception of road danger the scheme should enable children, young people and adults to make more and better use of their local streets.

Sustainability Implications:

- 7.7 The proposed scheme should assist the Council in encouraging more sustainable transport use such as walking and cycling by reducing vehicle

speeds and improving safety and the perception that the streets are safer and more user friendly. Any modal shift to more sustainable transport achieved as a result of the wider implementation of 20mph speed limits will also assist in improving air quality and reducing carbon emissions contributing to the Council's 'One Planet Living' programme.

SUPPORTING DOCUMENTATION

Appendices:

1. Summary of submissions made
2. Ruling from the Advertising Standard Authority regards local 20mph Advertisements

Documents in Members' Rooms

1. Copies of the submissions received in response to the Orders

Background Documents

1. Environment and Community Safety Overview and Scrutiny Committee (ECSOSC) report on 20mph (2010)
2. Speed Limit Review – A & B Class Roads (September 2010)
3. Speed Limit review – 20mph Pilot Schemes (June 2011)
4. Environment and Transport Sustainability Cabinet Member Meeting – “Brighton & Hove – A 20mph City” report (May 2012)
5. Item 32 – Transport Committee Report - “Brighton & Hove – A 20mph City?” (November 2012)
6. Item 52 – Transport Committee Report - “Brighton & Hove – A 20mph City?” (January 2013)
7. Item 49 – Environment Transport and Sustainability Committee Report (December 2013)

Crime & Disorder Implications:

- 1.1 There are no Crime and Disorder Implications of the report at this time.

Risk and Opportunity Management Implications:

- 1.2 There is a risk that the desired outcomes of the scheme will not be fully realised. Interim monitoring, however, suggests that this risk is very low and comprehensive monitoring will continue both in the Phase 1 area and in the Phase 2 area should it progress to ensure that any issues are identified, addresses and where necessary remedial action taken.

Public Health Implications:

- 1.3 Road casualty reduction is a Public Health priority and an indicator for Domain 1 of the Public Health Outcomes Framework 2013-2016. It is anticipated that the reduction in speed limits to 20mph in residential and commercial areas will help to reduce collisions and the severity of the outcome of some collisions. It is estimated that over 95% of pedestrians involved in a collision at 20mph survive, compared with only 80% at 30mph. A review of the impact of introducing 20mph zones in London over a twenty year period (Grundy et al 2009) demonstrated a reduction in road casualties particularly amongst young children.
- 1.4 It is likely that the scheme will support people to choose more physically active lifestyles by opting to make healthier active travel choices such as walking and cycling. Physically active adults have less risk of premature death and of chronic diseases with the direct cost of physical inactivity to the NHS across the UK is estimated to be £1.06 billion. For Brighton & Hove this cost is estimated to be **£3,077,340**
- 1.5 Promoting active travel can bring important health benefits but also contributes to objectives in relation to sustainability & congestion & air pollution, especially to reduction in particulate matter. This is discussed above in paragraph 4.40.
- 1.6 NICE guidance PH 8, PH 25 and PH 31 all recommend speed restrictions and the prioritisation of pedestrian and cyclists as means to improve public health

Corporate / Citywide Implications:

- 1.7 The proposed scheme will assist the Council to meet its strategic objectives and will contribute to the Council's and partners' wider objectives including those set out in the Corporate Plan and the Sustainable Community Strategy.
- 1.8 Brighton and Hove Bus Company have in the past raised concerns about the impact of the 20mph speed limits in the off peak hours on a number of cross city bus routes. Research carried out whilst preparing the proposals, together with the growing evidence base of actual impacts of such schemes in other areas and

in the Phase 1 area, indicate that such concerns are unlikely to be realised as a result of the Phase 2 proposals. A significant number of roads have been excluded from the scheme, many of them requested by the bus company. In addition bus priority works being undertaken in a number of roads in the city and in the phase 2 area will provide time savings for buses that officers consider will more than compensate for any minor journey delays that could be caused by lower speed limits. Monitoring will however continue to be undertaken on this issue.

Appendix 1 - Summary of submissions made in response to Phase 2 Speed Limit Orders

	Who	Order	Object / Support	Contents
1	Resident (Surrenden Road – Preston Area)	a-k	Support and object	Support overall proposals. Object to exceptions. Following roads should also have 20mph: - Surrenden Road - Preston Drove - Stanford Avenue
2	Resident Highbank Westbank	c	Support and Object	Objects to majority of Westdene remaining at 30mph and believes the proposed 20mph area around the school to be too small.
3	Resident Patcham	a	Support	emphasize importance of enforcement
4	Resident Woodland Drive (Dyke road west area)	b	Object	will create traffic jams and confusion - 20mph should only be in central Brighton
5	Resident 5 ways	All	no objection	no objections but concerned about enforcement - without enforcement considers it a waste of time and money
6	Resident Warmdene Close Patcham	e	Support	People drive too fast especially on Carden Avenue
7	Resident Dyke Road Drive Dyke road east Area	c	Support	especially for Dyke Road Drive as concerned about speed as a parent and road is route to school. Would like to see it supported by traffic calming
8	Resident Tivoli Crescent	c	Support	especially The Drove - would like traffic calming considered in future if speeds do not reduce with signage
9	Residents Chester Terrace Preston Area	All	Object	object to the signage , people already drive less than 20mpoh and those that exceed it cannot be monitored. Waste of money and not needed in Preston area

10	Resident Dyke road Drive	c	Support	especially Dyke Road Drive as is a cut through. Desire to see further engineering measures to slow traffic on this road
11	Resident Goldstone Crescent (Dyke road West area)	b	Support and Object	Would like to see 20mph in this area especially on Goldstone Crescent
12	Resident Bevendean Crescent (Mouslecoomb Area)	f h l j k	object	20mph limits are not needed - objects to all 20m-ph limits. Coldean lane works fine as is and speed camera caused shunts will cause more accidents frustrations and pollution
13	Resident Hove Park Road (Dyke road West)	b	Support	support as schools in the area and used as a rat run
14	Resident	all	object	waste of money when cutting children's and social services. Limits either not needed or will not be obeyed and will cause delays to bus services
15	Resident Hollingbury Park Avenue (Hollingdean Area)	d f	Support and object	feel strongly that Preston , Stanford and Surrenden should be reduced to 20mph
16	Resident Hollingdean Terrace	f	Object	no need for limit as area flows nicely and this will cause congestion
17	Resident Lawrence Road (West Hove Area)	a	Support	general support - will encourage more walking and cycling and make environment nicer
18	Resident Vardean Drive (Preston Area)	All specifically d	object	residents voted against it. Signage is "graffiti". Limit not needed and costly to implement - should be spent on services that area being cut and stop penalising drivers - "draconian measures " not wanted on this private road

19	Dyke Road Drive	c	Support	especially Dyke Road Drive to improve safety for peds, cyclists reduce pollution - would like traffic calming measures also on this road
20	Resident Coldean lane (Coldean)	all	Support	will lead to safer roads and reduced pollution
21	Resident Toronto Terrace (Phase 1 Area)	all	object	inclusion of main arterial routes as stated in consultation specifically objects to the inclusion of Ditchling road (south of fiveways), Coldean Lane reduction to 30mph, Bear Road reduction and Freshfield Road
22	Resident Waldegrave rd (Preston Area)	All	Support and object	general support - oppose the removal of Preston Drive and Stanford Ave as 30mph is not safe for these roads, used by children on routes to schools in the area
23	Resident St Leonards Road (West Hove)	a	Support	General Support - residential area with families - request for traffic humps to support the lower limit
24	Resident Dyke Road Drive	c	Support	specially inclusion of Dyke Road Drive due to rat running - safety reasons as currently unsafe for pedestrian cyclists and drivers - road used by lots of children to get to school

25	Resident Balfour road (Preston Area)	d	Object	unnecessary to change limit and will result in frustration for drivers - will be ignored by careless drivers. Roads that have been exepcted are the problem roads pedestrian crossing would have more effect that a lower limit at Preston drove/surrenden junction and n ditchling road - waste of money and officer time
26	Resident	e	Support and object	object to retention of 30mph in Carden Hill and Patcham in general - currently difficult for children and elderly to cross the road, should be encouraging children to travel sustainably by making roads safer
27	Resident Hollingbury Park Avenue (Hollingdean Area)	d f	support and object	all residential roads should have 20mph limits and some should even be 15mph. Object to exclusion of Preston Drive and Stanford Avenue as they are residential roads - to encourage motorists to speed up here is dangerous
28	Resident Brittany road (west Hove)	a	object	phase 1 was a waste of tax payers money nobody is adhering it and police are not enforcing it. 30mph is perfectly acceptable and safe and does not need to change. Anti car and this will have negative economic impact stationary vehicles cause more pollution not less

29	Hove Resident (unclear if in phase 1 or 2 area)	all	object	new limits will do nothing to ease pollution or emissions - will create bottle necks - irritable motorists - cost is a waste when council tax proposed to go up walking and cycling everywhere is not the answer
30	Resident (Patcham area)	e	Support and object	object to deferment of Patcham roads - something is needed to make roads safer in this area. Disappointed that council doing nothing in this area
31	Resident Surrenden Road (Preston Area)	d	support	general support
32	Resident Southdown Avenue (Preston area)	all	object	do not agree with 20mph in road that are not adjacent to parks or schools - unnecessary, cause congestion, increase pollution and cost money we cannot afford
33	Resident Peacock Lane (Preston Area)	d	support	specifically Peacock Lane narrow lane used by school children and rat running at speed
34	Resident St Georges Road (East Brighton)	i	support	general support
35	Resident Dartmouth Crescent (Bevendean)	h	Support and object	Dartmouth Crescent not listed in the order
36	Resident Freshfield Road (East Brighton Area)	i	Support	General support and specifically Freshfield Road inclusion - will make the area safer
37	Resident Bristol St (East Brighton)		object	waste of money and 20mph unwarranted

38	Resident Turner Road (Phase 1 East Brighton area)	all	object	20mph is more damaging to the environment as gear rotations are optimised for 30mph distracting for drivers. Object to Coldean lane because it is slow enough, not residential if anything should be increased - go and look at Germany
39	Resident St Marys Square (East Brighton)	a b c d e f	Object	scheme not in response to evidence based analysis of local road safety requirements - limit will be ignored by drivers as unrealistic. There is no existing statistical baseline safety information for the area to determine success
40	Resident Freshfield Road (east Brighton)	i	support	especially freshfield road will create a safer environment
41	Resident Cowfold Road (East Brighton)	i	support	increases safety especially for children
42	Resident Balfour Road (Preston Area)	d	support	three schools in the area
43	Resident Dyke Road (Dyke Road West)	a - i	object	waste of money, existing 20mph are ignored and police cannot/will not enforce it
44	Resident (West Hove)	a	support and object	support proposals but object to Portland Road being excluded.
45	Resident St Martins Place (Area 8)	a-i	object	blanket limit will be dangerous, cause tailgating, congestions and pollution, increase petrol consumption

46	Resident Mansfield Road (west Hove)	all	object	longstanding 30mph is common across Europe is a good balance. Will cause confusion, will delay people, suggests there is little evidence that lower limits will make roads safer
47	Resident Clarendon Terrace (East Brighton)	a-i	object	if current limits are not enforced what is the point of changing them
48	Resident Matlock Road (Dyke Road East)	all	Support	specifically TRO C for Matlock Road - will make it safer. Support 20mph across the city
49	Resident Norwich Close (Bevendean)	all	object	o benefits and increased congestion
50	Resident Kingston Close (Hangleton Phase 3)	all (no order cited)	object	general opposition - slows traffic , increased congestion, pollution and travel time
51	Resident Cavendish Court (East Brighton)	a	object	questions safety benefits
52	Resident palmeira Avenue (Phase 1)	all a-k	object	lower limits are unnecessary will slow traffic and increase congestion causing more pollution and frustration 30mph limit on Coldean lane is unnecessary as road is safe enough already
53	Resident St Michaels Place (Phase 1)	a-i	object	existing limit doesn't work in public consultation majority did not support. Money better spent elsewhere. Anti business, anti motorist anti school anti work and anti social
54	Resident Upper North Street (Phase 1)		object	waste of money, not enforceable so is universally ignored, increases emissions

55	Parent Lancing Prep	b	Support	especially The Droveway, Hove park road and Elrington Road - make area safer for residents and children
56	Resident/Parent Lancing Prep	b	Support	especially area around Lancing Prep School
57	Parent Lancing Prep		Support	general support
58	Parent lancing prep		Object	waste of time and money . Money would be better spent improving parks, playgrounds and affordable homes and road safety education
59	Resident ditchling road	All	support	especially area 6 - lower limits will help change driving habits
60	Resident	b	Support	general support for The Droveway
61	Resident	All	support	general support due to school locations
62	Resident Hangleton way (Phase 3 area)		object	waste of money
63	Resident southdown road (Preston)	b d	support	general support as would like to see traffic slowed and school location of the driveway
64	Resident surrender road and local business owner (all	object	general objection "crippling the city"
65	Parent Lancing Prep	b	support	general support
66	Resident wilbury avenue (Phase 1) parent lancing prep	b	support	general support
67	Resident The Drive (Phase 1)	b	support	general support
68	Resident Goldstone Crescent	b	support and object	Want the area to be 20mph because busiest parks in the area supports the driveway and hove park road would also like Shirley Drive and Goldstone Crescent
69	Resident wilbury villas and parent lancing prep	b	support	general support

70	Resident eldred Avenue (westdene)	a b c d f g	object	object to restricting speed limit around the school - no need to change the national speed limit
71	Resident Pembroke Gardens (west Hove)	a	object	erosion of city's ability to appeal to tourists who are car drivers. Will not encourage people to walk and cycle this is social engineering it is not your place to dictate the driving habits of an entire city. This is not your remit - we did not vote on whether we wanted these traffic orders.
72	Resident St Martins Place (Bevendean)	a	object	general objection slowing traffic does not stop accidents. Slower traffic makes more pollution gear changing causes more stress on vehicles and uses more fuel
73	Resident Queen Vic Avenue (Goldstone Valley)	all	object	general objection as congestion naturally slows traffic. It has not been proved that accidents reduce where there is a 20mph limit. Costs too much money
74	Resident Lloyd Road *(DR West)	b	support	general support to improve safety
75	Resident Beal Cres (Hollingdean)	all	object	general objection in principle waste of money
76	Brighton and Hove Bus Company	all	support	support dependant on orders remaining as is
77	Resident Redhill Drive (westdene)	all	object	general objection slowing down traffic and driving away visitors waste of money and unnecessary
78	Resident Newick Road Moulsecoomb	j	object	40mph limit helps relieve peak traffic congestion from lewes road

79	Resident William St (Phase 1 area)	a	object	if not enforced then not worth having - waste of money and supports disregard of other tros
80	Resident	b	support	General support
81	Resident Coleman Ave (West Hove)	all	support and object	general support for 20mph but objects to exclusion of Portland Road as is most dangerous road in the area
82	Resident Chrisdoru Road (Mile Oak Phase 3)	all	object	lowering limits causes congestion and distracts drivers
83	Resident Copse Hill (Westdene)	c	Object	does not need to be rolled out across entire city, outside school sis fine but should be school times only. Time and money better spent elsewhere repairing roads rather than just painting roundels, helping the homeless or rubbish collection. Haven't spoken to one resident who supports this
84	Resident Copse Hill (Westdene)	c	object	people don't obey existing limits/have made no difference. Limits are not enforced and are unenforceable . Waste of money - money should be spent improving road surfaces and better lighting or roads and paving, no factual evidence to support reduction of collisions disregard of needs, wants, desires of the electorate, and error in road listing in westdene area
85	Resident Nevill Avenue (Phase 3 area)	all	object	unnecessary polluting and waste of money better spent on potholes and resurfacing

86	Resident Dale Drive (Patcham)		object	not need so far out of town except for around schools. Anti green sentiment. No vote greater than vote so undemocratic. Better off repairing road surfaces. Police say they cant police it and no one complies in central Brighton makes pedestrians more lazy about their safety
87	Resident Hollingdean Terrace (Hollingdean)	a-i	object	frustrating stressful irrationally places, unenforceable and pointless. Extra pollution and fuel consumption from use of lower gears. 30mph is fine. At busy times not possible to exceed 20 so why enforce it. Difficult to drive at 20mph existing limit widely ignored why bother on what is only a "guide" limit constant abuse of roads by non drivers (ped and cyclist)
88	Resident The Drive (Phase 1)	b	support	general support re roads around Lancing Prep School
89	Resident College Terrace (East Brighton)	i	support	would like to see northern section of Freshfield included due to use during Race events and car boot sales on Sundays and safety of visibility near the roundabout
90	Resident	b	support	especial The Driveway due to school location and road safety reasons
91	Sussex Police	all	no objection	tailored scheme, reassured of monitoring process. No objections and no objections to reduction of Coldean lane
92	Resident	b	support	general support due to school locations
93	Resident St Johns Place (Phase 1) - linked to lancing Prep	b	support	improved safety round school location (Lancing Prep)

94	Resident Leahurst Court road (Dyke Road East)	all	object	casualty reduction claim not valid without results of P1. Portsmouth shows casualty figures have not reduced. Air pollution level shave not reduced due to driving in lower gears
95	Resident Aymer Road (West Hove) parent lancing prep	b	support	especially the Drove way due to school and dog walkers who use it
96	Sue Shanks Ward Councillor	d	cllr Support and object	Support 20mph on Preston Drove, Stanford Ave and Surrenden Road
97	Resident preston Drove (Preston)	all	support and object	general support and want to see 20mph on Surrenden Road, Preston Drove and Stanford Avenue
98	Resident Loder Road (Preston)	all	support and object	general support for safety reasons specific for Loder and bates and object to Surrenden being excluded as it should be 20mph
99	Resident Preston Drove (Preston)	d	Support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
100	Resident Peacock Lane (Preston)	d	Support and object	general support esp Peacock Lane and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
101	Resident Surrenden Road (Preston)	all	Support and object	general support for all especially e and d and want 20mph on Surrenden Road - Preston Drove - Stanford Avenue and like Ditchling road reduced to 30mph at Woodbourne garage
102	Resident Peacock Lane (Preston)	d	Support and object	general support esp Peacock Lane and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue

103	Resident	all	support and object	general support esp Peacock Lane and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
104	Resident Preston Drove (Preston)	d	Support and object	general support as well used area especially want 20mph on Preston Drove
105	Resident Preston Drove (Preston)	d	Support and Object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue because of schools and use of roads by children
106	Resident Grantham Road (Preston)	all	Support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue because of schools and use of roads by children
107	Resident Osborne Road (Preston)	d	Support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue because of schools and use of roads by children -evidence that 20mph safer
108	Resident Preston Drove (Preston)	d	Support and object	Want to see Preston Drove reduced to 20mph
109	resident Bristol gate (East Brighton)	all	object	general objection - vendetta against the motorist waste of money not necessary
110	Resident	d	support	particularly around schools and where children walking and cycle on routes to schools
111	Resident	all	Support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue (whole length)
112	Resident Cuthbert Road (east Brighton)	i	Support	make streets safer for ped, cyclists and horse riders

113	Resident Whittingehame Gardens (Preston)	d	support and object	general support as residential roads with schools but should include full length of Surrenden Road
114	Resident Lowther Road (Preston)	d	support and object	general support and want to see 20mph on PD/SA and Surrenden Road especially Preston Drove
115	Resident	all	support	general support
116	Campaign for Better Transport East Sussex	all	Org Support	general support as will encourage and enable cycling , have little impact on journey times
117	Resident Florence Road	all	Support and object	general support and want to see 20mph on PD/SA and Surrenden Road
118	Resident Preston Drove (Preston)	d	Support and object	general support and want to see 20mph on PD/SA and Surrenden Road especially Preston Drove
119	Resident Rugby Road (Preston)	a-i	support	safer and improves traffic flow
120	Resident Surrenden Road	a-j	support and object	general support and want to see 20mph on PD/SA and Surrenden Road especially Surrenden due to the schools
121	Resident Preston Drove	d	Support and object	general support for roads off Five ways (Preston Drove and Stanford Ave)
122	Resident Stanford Ave (Preston)	all	support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
123	Resident Ditchling Road (Preston)	d f	support and object	especially for Ditchling Road south of fiveways - make roads safer and more pleasant and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue (whole length)
124	Resident Beaconsfield Villas (Preston)	all	support	casualty reduction is a public health priority and this will help, reduce perception of danger and remove it as barrier to healthy travel choices increased walking and cycling will reduce emissions and improve air quality by reducing congestion, improve conditions for vulnerable road users and ease community severance

125	Resident Beaconsfield Villas (Preston)	all	support	casualty reduction is a public health priority and this will help, reduce perception of danger and remove it as barrier to healthy travel choices increased walking and cycling will reduce emissions and improve air quality by reducing congestion, improve conditions for vulnerable road users and ease community severance
126	Resident Evelyn Terrace (East Brighton) allotment owner (Bevendean)	l h	Support	will improve safety and encourage residents to walk in the area
127	Resident Preston Drove (Preston)	all	support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
128	Resident Havelock Road Preston)	d	Support and object	object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue against officers recommendations - essential for public safety
129	Resident Stanford Avenue (Preston)	d	support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue - concerned that these roads have been left out
130	Resident ladies mile road (Patcham)	e	support and object	objects to exclusion of roads in Patcham and Hollingbury as is a residential area particularly braybon Avenue
131	Resident Harrington Villas (Preston)	d	support and object	general support and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
132	Resident St keyna Ave (west Hove)	a i	object	a MC rider is dangerous, riding in lower gear at higher revs - 20mph removes responsibility from good drivers. Making drivers angry
133	Resident old London road (Patcham)	e	support and object	objects to exclusion of the Mackie Estate, vale Avenue and Church Hill
134	Resident	all	object	since P1 has seen increase in fuel consumption - number of incidents ahs not reduced but has increased - excluded roads should be 40mph - 20mph only at school entrances during school time s

135	Resident	d	support and object	Support due to school locations and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
136	Resident Gordon Road (Preston)	d	support and object	Support due to school locations, parks to improve safety and want to see 20mph on Surrenden Road - Preston Drove - Stanford Avenue
137	Resident Havelock Road (Preston)	a b c d	support	general support for community benefit
138	Resident Canfield Road (Bevendean)	all	Support	need speed reduction to reduce pollution, noise and increase safety
139	Resident The Crestway (Hollingdean)	a	object	more traffic jams and more pollution (opposition to lewes road)
140	Resident and Business Owner Goldstone Road (Phase 1 area)	all	object	general objection agree outside schools but only during school times trying to enforce a blanket reduction mean drivers less like it to obey where needed people prefer using cars money better spent on refuse collection or making buses cheaper anti business people do not want this
141	Resident Sackville Road (West Hove)	all	object	waste of money - should be lowered around schools (during school times) and hospitals only
142	Resident Gloucester Road (Phase 1)	a-i	object	general objection to 20mph limits anywhere - do not work, cause congestion and increase pollution due to need to drive in lower gear and increase in fuel consumption
143	Resident newmarket Road (Phase 1)	all	object	general objection agree outside schools but only during school times trying to enforce a blanket reduction mean drivers less like it to obey where needed people prefer using cars money better spent on refuse collection or making buses cheaper anti business people do not want this

144	Resident At Anns Wells Gardens Area	b	support and object	support for roads included but object to exclusion of other roads especially around the parks inc Hove Park Road, Goldstone Crescent, Orchard Road and western section of The Drove way - kids routes to schools, streets are public roads not private estates. wishes of local residents are not the only factor
145	Resident Varndean Road (Preston)	d	support and object	general support for 20mph but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue as all are regularly used by children and proximity to schools. Minimal impact on bus journeys would be overshadowed by safety benefits
146	Resident Glebe Villas (West Hove)		object	have seen more accidents since introduction of 20mph so more dangerous and caused more pollution. Money would be better spent elsewhere
147	Resident out of city - Southwick	all	object	pointless and unenforceable. Waste of money that would be better used elsewhere
148	Resident Surrenden Road (Preston)	d	support and object	should include all of Surrenden Rd - location of schools leaving it out will increase traffic flows. Public health and casualty reduction arguments cited
149	Resident Hornby Road (Bevendean)	h	object	current limits are sufficient - journey time and congestion
150	Resident Hartington Road (Phase 1)	a b	object	20mph is dangerous and more polluting
151	Resident out of town East Sussex	a	object	people don't obey existing zone - no one wants this and council is forcing it on everyone will not make roads safer people are less aware in slower zone
152	Resident Auckland Drive (Moulsecoomb)	j	object	use Coldean lane regularly and do not want journey time extended any further - anti lewes road scheme. Scheme is anti car
153	Resident Florence Road (Preston)	all	support and object	support 20mph but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue as they are residential streets

154	Resident Balfour Road (Preston)	d e	support and object	support 20mph but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
155	Resident	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
156	Resident	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
157	Resident Shanklin Road (Phase 1)	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue also object to exclusion of Braybon Avenue, carden Hill and would like Ditchling Road 20mph extended north of Fiveways
158	Resident Surrenden Road (Patcham section))	d e	support and object	support 20mph and object to exclusion of roads in Patcham and Hollingbury especially braybon, carden avenue and ditchling - schools in area, young families and elderly. Additional signage required by exclusions is costly and detrimental to area E/W section of surrenden isn't a bus route
159	Resident Lowther Road (Preston)	d	support and object	support 20mph but would like Preston Drove reduced to make it safer especially for cycling
160	Resident in Hassocks - out of city	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
161	Resident Gordon Road (Preston)	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
162	Resident (West Hove)	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
163	Resident Lowther Road (Preston)	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
164	Resident Phase 1 area	all	support and object	Support orders but object to exclusion of Portland Road, Hove park road, goldstone Cres, orchard road and The Drove way and other roads in DRW area, westdene streets, Patcham and Hollingbury street, Surrenden Road/PD/SA
165	Resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
166	Resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue

167	Resident Preston Drove	d	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue as will be confusing for drivers, consistent speeds will be better for flow of traffic,
168	resident Waldegrave Road (Preston)	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
169	Resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
170	Resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
171	Resident Preston Drove (Preston)	d e	support and object	support orders but object to exclusion of Stanford Avenue and Preston Drove - are not major bus routes
172	Resident Hollingbury Park Avenue (Hollingdean)	d e f	support	road safety benefits, increase confidence for cyclists school locations on ditchling road quality of life will improve
173	Resident	de	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
174	resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
175	Resident Surrenden Road	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
176	Resident Chester Terrace (Preston)	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
177	visitor to City - Resident in west Sussex	a -i	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
178	Resident Edburton Avenue (Preston)	a-i	object	existing limits have crippled the city, increased pollution and increased journey times by 50%, higher risk of accidents from frustrated drivers
179	Resident Havelock Road	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
180	Resident North Road (DYE)	d	support and object	support (will encourage cycling) orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue

181	Resident (West Hove)	all	support and object	support (safer healthier neighbourhoods) orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
182	Resident Osbourne Road (Preston)	all	support and object	improved safety and quality of city through reduced road noise and opps for cycling - object that Surrenden Road - Preston Drove - Stanford Avenue not included also want Ditchling included further north
183	Resident Frederick Gardens (Phase 1)	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue also Braybon Ave carden Hill and Ditchling Road
184	Resident Surrenden Road	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
185	Resident Surrenden Crescent (Preston)	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove
186	Resident Hill Drive (DRW)	b	Support and object	object to exclusion of Hill Drive due to steep gradient, sharp bend and narrow pavements
187	Resident Saunder park View (Hollingdean)	a-i	object	wont work, money would be better spent on other road projects like resurfacing, cant be enforced by the police, causes more pollution as cars have to drive on higher gears
188	Resident Chester Terrace (Preston)	all	support and object	cleaner, quieter and safer for everyone but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue - buses not a credible reason
189	Resident Preston Drove (Preston)	d	Support and object	object to exclusion of Preston Drove - location of park , cricket ground tennis club, church - will encourage drivers to speed on Preston is excluded
190	Resident Gladys Road (West Hove)	all	Support and object	Support 20mph and object to all the exclusions
191	Resident New Church Road	a	support and object	support 20mph but objects to exclusion of Portland road due to collision/casualty record and exclusion of New Church road due to location of nurseries - residential roads with community facilities
192	Resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue

193	Resident Preston Drove	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
194	Resident Havelock Road	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
195	Bricycles CTC	all	support and object	support orders but object to excluded roads
196	Resident Southover Street (Phase 1)	d	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
197	Resident Stanford Avenue (Preston)	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
198	Resident Freshfield Road (East Brighton)	d e i	Support and object	support, especially freshfield Rd but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue and should include all residential roads within Hollingbury and Patcham
199	Resident	d e	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
200	Resident Fiveways (Preston)	all	support and object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue and other roads excluded
201	Resident Southdown Avenue (Preston)	all	Object	not necessary and waste of money when cuts are being made to essential services
202	Resident Harrington Road	d e	Support and Object	support orders but object to exclusion of Surrenden Road - Preston Drove - Stanford Avenue
203	Resident Stanford Ave (Preston)	d	object	causes pollution and increase journey times, difficult to adhere to on arterial roads
204	Resident Matlock Road	b c	support	supports - improve safety, especially The Drove way tivoli and matlock Roads
205	Resident Surrenden Road	a d	object	waste of money - council has done nothing to ease accident hotspots, making town impossible to move in
206	Resident Overhill Gardens	e	object	no evidence that 20mph limits work or reduce collisions. Consultation has removed mandate for scheme

[illegible]



Appendix 2 – ASA Ruling on adverts related to 20mph Phase 2 from GMB Brighton & Hove Taxi Section and Unchain the Brighton Motorist

ASA Adjudication on GMB Brighton & Hove Taxi Section

MB Brighton & Hove Taxi Section

22 Stephenson Way
Euston
London
NW1 2HD

Date:

8 January 2014

Media:

Regional press

Sector:

Non-commercial

Number of complaints:

1

Complaint Ref:

A13-245585

Ad

An ad in the Brighton & Hove Independent was headed "Zone it ... Don't Blanket!" Below were two road signs, one with text stating "20 CITY WIDE BLANKET LIMIT" with a red cross through it, and the other with text stating "20 CRUCIAL ZONES" with a green tick below.

Text below stated "GMB feels obligated to respond on behalf of our many members who drive in our city, and also with permission on behalf of our colleagues the members of the Sudanese Taxi Forum, Independent Taxi Drivers and members of the Arab Taxi Association. GMB recognises the importance of crucial 20mph speeds zones but does not support far reaching 20mph speed limits. GMB agree with 20mph in the correct places at the correct times. GMB lobbied Green Councillors during the phase 1 asking for: Arterial routes to be removed ... Speed limits to be different at night time when footfall and cyclists were absent".

Further text stated "GMB were told that due to costs the far reaching policy was the only policy viable. However, a complete 24hr 20mph speed limit across the whole of the city will leave drivers feeling blasé and distracted from where a 20mph speed limit is vitally important such as hospitals, schools and residential streets ... in other words, in the appropriate CRUCIAL ZONES. The GMB supports measures to save lives but does not support the 20mph extensive Speed Limit approach".

Issue

One complainant challenged whether the suggestion that a "blanket" 20mph limit was being proposed by Brighton & Hove City Council was misleading, as the proposal did not include the "arterial routes" referred to in the ad.

CAP Code (Edition 12)

[3.13.7](#)

Response

GMB Brighton & Hove Taxi Section (GMB) said it was their union's opinion that they were justified in placing the ad on behalf of their members for a number of reasons. They said the ad stated the opinion of their members who felt that the proposals by Brighton & Hove City Council with respect to the Phase 2 20 mph consultation was proposing a 20 mph blanket policy. They provided a copy of the agenda and minutes from a Brighton & Hove City Council Transport Committee meeting that was held on 15 January 2013. They noted that the agenda and the minutes referred at various points to a "blanket" scheme, which they said indicated both the general public and Councillors of the local Labour and Conservative Groups believed a blanket ban was proposed. They also noted that the report showed that eight per cent of those who responded to the consultation on the principles of 20 mph limits said they would not support a blanket limit, but wanted the limit to be only in certain areas including around schools, shops, play areas and the inner area of the city. GMB said the agenda showed the Council considered that a blanket scheme was less expensive than separate zones.

GMB said that numerous Brighton & Hove City Councillors had publically referred to the 20 mph speed limits as a "city-wide" proposal, and GMB saw no difference between "city-wide" and "blanket". They also noted that in a recent local newspaper, a Brighton & Hove Conservative Transport spokesman had received criticism from his fellow members and from lobbying group Unchain the Brighton Motorist after saying he broadly supported the "near blanket" approach. They listed a number of roads that were mentioned in the consultation and questioned which roads were absent from the proposals.

We contacted Brighton & Hove City Council for their comments. The Council said the agenda and minutes from the 15 January meeting referred to Phase 1 of the programme, which had already been implemented, rather than Phase 2, which was the focus of GMB's ad. They noted that it was clearly stated in the minutes and agenda that the scheme would not be "blanket" and that key

roads would be excluded from the scheme, retaining their existing limits. The Council acknowledged that the report from that meeting showed that people did not support a blanket limit, but wanted the limit to be only in certain areas. They said that the proposals put forward in response to the consultation acknowledged this finding and a blanket limit was not proposed.

The Council said that in the agenda and minutes provided by GMB, the word "blanket" rarely featured, but GMB assumed it was referred to. With regard to the fact that GMB believed the Council considered a blanket scheme was less expensive than separate zones, the Council said the paragraph of the agenda quoted referred to the difference in cost between a 20 mph zone (which under Department for Transport guidelines had to be implemented with traffic calming measures) and a 20 mph limit (which under Department for Transport guidelines required only signage and road markings). They said this distinction was a technical one linked to implementation and did not relate to the size of area or number of roads included or excluded from the scheme.

The Council said the consultation on Phase 2 of the 20 mph limit programme, which was the focus of the ads, included the exclusion of the main roads in the city and provided the option for respondents to highlight further roads for exclusion. They added that the proposals focused on coherent residential and shopping areas, leaving out strategic roads. Information about the proposed routes was publically available on the Council's website. They said that throughout the implementation of Phase 1 and the consultation on Phase 2 of the programme, the Council had been very clear that there was no "blanket" approach. They provided a number of links to Council press releases and articles quoting Councillors who verified this. They said that many organisations and individuals who were independent of the Council understood that the proposals did not include a "blanket ban", and provided an example of a statement made by an external organisation that supported this.

The Council advised that a number of presentations and meetings were held with the local taxi forum, including GMB union representatives, which explained the details of the scheme proposals and the minimum number of roads that would be excluded from the 20 mph speed restriction. They included a copy of a slide from one such presentation from December 2012 that outlined the excluded roads as at the end of Phase 1: the A259 (Seafront); New Church Road; Ditchling Road (north of the railway line); the A23 (north of the railway line;) and A270 (Old Shoreham Road).

Assessment

Upheld

The ASA noted that GMB believed placing the ad was acceptable as it stated the opinion of their members. However, we considered that the ad did not make clear that it was their belief that the proposed changes would amount to a "blanket" ban, but presented this as fact. We therefore required evidence to substantiate the claim.

We acknowledged that the evidence GMB provided included references to a "blanket" proposal, and accepted that this might suggest that some people in Brighton considered that a "blanket" ban was proposed. However, we noted that while one example quoted a Brighton & Hove Conservative Transport spokesman referring to a "near blanket approach", none of the evidence provided by GMB, quoted members of Brighton Council explicitly suggesting or accepting that a "blanket" ban was proposed. We also understood that a number of Brighton & Hove City Councillors had publically referred to a "city-wide" proposal, and that GMB believed that this was the same as a "blanket" 20 mph proposal. We considered that although the terms "blanket" and "city-wide" could be interpreted to mean the same thing, they could also be defined differently, with "city-wide" referring generally to an area the proposal might affect and "blanket" referring to the area specifically and inclusively covered. We also noted that GMB's ad featured only the term "blanket".

We considered that Brighton & Hove City Council had consistently and publically said that the 20 mph limit would not be "blanket", and that key roads would be excluded from the scheme. We were satisfied that the Council had provided sufficient information about main roads that were excluded from the proposals. We concluded that GMB had not provided evidence that the Council planned to impose a "blanket" ban and the ad was misleading.

The ad breached CAP Code (Edition 12) rules 3.1 (Misleading advertising) and 3.7 (Substantiation).

Action

The ad must not appear again in its current form. We told GMB not to refer to the proposed 20 mph limit as a "blanket" limit.

ASA Adjudication on Unchain the Brighton Motorist

Unchain the Brighton Motorist

63 Queens Road
Brighton
BN1 3XD

Date:

19 February 2014

Media:

Regional press, E-mail

Sector:

Non-commercial

Number of complaints:

15

Agency:

Cobb PR

Complaint Ref:

A13-243394

Background

Summary of Council decisions:

11 issues were investigated, all of which were Upheld.

Ad

A regional press ad outlined opposition to a council-backed 20 mph scheme. The headline stated "Council declares war on city motorists ...". Bold text below the headline stated "If like other city businesses and council tax payers you are dumbfounded by the action of Brighton & Hove City Council in the implementation of draconian parking charges, eradication of essential parking spaces and their handling of the new 20 mph speed restriction, this call to action is intended for you". Smaller text below stated "Despite the total lack of evidence to support the council's transport plans, they are ploughing on regardless with Phase 2 and ultimately intend to extend the 20 mph limit as far afield as Saltdean in the east and Portslade in the west, along with the other crippling measures aimed at innocent motorists. Also damaging the local economy, especially tourism, by putting visitors off coming to the city. Local people must act now. You can have your say by visiting the Brighton & Hove City Council website: www.brighton-hove.gov.uk/20mph. Most significantly, Brighton & Hove City Council took no notice of the Portsmouth City Council's evaluation of the introduction of a 20 mph scheme that resulted in an increase in fatal road traffic accidents. Visit [5](http://www.brighton-</p></div><div data-bbox=)

hove.gov.uk/20mph today and tell the council what you think". Further text stated "Legal experts have poured scorn on the council's findings ..." and included a box with text that stated "No evidence to suggest measures reduce accidents; No evidence to suggest measures reduce carbon emissions and air pollution; No evidence to suggest measures create safer roads; No evidence to suggest measures reduce city congestion; No evidence to suggest measures will encourage greater use of public transport."

Issue

Fifteen complainants, including Brighton and Hove City Council and members of 20's Plenty for Us, Brighton and Hove Friends of the Earth and Bricycles, challenged whether the following claims were misleading and could be substantiated:

1. "total lack of evidence to support the council's transport plans";
2. "they are ploughing on regardless with Phase 2 and ultimately intend to extend the 20 mph limit as far afield as Saltdean in the east and Portslade in the west";
3. "damaging the local economy, especially tourism, by putting visitors off coming to the city";
4. "Legal experts have poured scorn on the council's findings";
5. "No evidence to suggest measures reduce accidents" or "create safer roads";
6. "No evidence to suggest measures reduce carbon emissions and air pollution";
7. "No evidence to suggest measures reduce city congestion";
8. "No evidence to suggest measures will encourage greater use of public transport";
9. "Brighton & Hove City Council took no notice of the Portsmouth City Council's evaluation of their introduction of a 20 mph scheme"; and
10. "[The Portsmouth City Council's scheme] resulted in an increase in fatal road traffic accidents"
11. Four complainants challenged whether the ad was misleading, because it did not make the identity of the advertiser clear.

CAP Code (Edition 12)

[3.13.33.53.7](#)

Response

Unchain the Brighton Motorist (UBM) was a loose network of businesses, associations, groups and individuals that included taxi companies,

restaurants, accountants, hotels, retailers and tradesmen. It also included members of Brighton's Tourism Alliance, Brighton's Federation of Small Businesses, the London Road Area Traders' Association, along with the GMB and the Unite unions. They said the ad was one of a number of insertions in the Brighton Argus that were published with the broad aim of influencing local politics, in particular by mobilising people to engage with issues affecting motorists. They said the ad aimed to influence people away from Green Party policy and from the party itself if there was no policy change, and they believed the ad fell outside the remit of the CAP Code, as rule 7.1 stated that "Claims in marketing communications, whenever published or distributed, whose principal function is to influence voters in a local, regional, national or international election or referendum are exempt from the Code". UBM said the ad was obviously part of a local political campaign, and the average reader would have read and understood its claims in its local and political context. They believed that as people were asked to vote as part of the consultation and as the Council referred to a 'mandate', this constituted a referendum, and as the ad linked to the page of the Council's website that directed users to the consultation, the ad should be exempt from ASA investigation.

1. UBM said this statement must be understood in the context of the ad, which was the proposed widening of the 20-mph speed limit area in Brighton and Hove. UBM said those reading the ad in their local paper would have understood that the reference to a "lack of evidence" was to a lack of local evidence regarding these specific transport plans, rather than a lack of any evidence whatsoever.

UBM accepted that the Council had cited studies of 20-mph schemes in other localities that showed certain benefits. They also noted that there was countervailing evidence that highlighted negative impacts of reducing speed limits. They believed data from Germany from 34 years ago, which they said Brighton and Hove Council relied upon, could not be evidence of how modern cars (with ABS braking systems that were designed to crumple on impact) may affect road safety when driven in Brighton and Hove presently.

UBM said the complaint of a lack of local evidence was made in the light of the Council's obligation under Department for Transport guidance that was published in January 2013 to carry out local research to inform its decision making. They pointed out that the Department for Transport guidance stated "This updated guidance provides part of the framework for speed limits, where local authorities can set speed limits on their roads below the national limit, in response to local risk factors and conditions" and "It may well be that a speed limit need not be changed if the collision rate can be improved or wider quality of life objectives can be achieved through other speed management measures, or other measures. These alternative measures should always be considered before proceeding with a new speed limit ...". UBM said despite this obligation, comments on the Council's website and leaflets regarding Phase 2 made clear that it relied only on general national and international research regarding 20-mph limits, and this was not local evidence suited to the particular circumstances of Brighton and Hove.

They said further confirmation of the Council's lack of local evidence in support of Phase 2 at the time of the ad could be found in comments made by the Council's officer charged with researching Phase 2, in a meeting on 11 September 2013 with four members of the Brighton taxi trade. They said her comments made clear that preliminary local data would only be available after 18 months, and robust data after three years. They said she also made clear that the first full area monitoring, regarding compliance with Phase 1, was taking place only that month and she did not suggest the existence of any other local evidence. They said that despite the lack of available local evidence, by the time of the ad the consultation was already underway, and a timetable for implementation had been published. They added that the Council made clear that the proposed timescale for consultation and implementation was very short.

UBM said the national-level evidence upon which the Council relied was wholly inadequate for providing relevant information for the local context. They said the Council placed particular reliance on a 2012 report from the Royal Society for the Prevention of Accidents in going ahead with Phase 2, and placed a link on their website to this as evidence to support their case. However, the UBM contended that this report primarily addressed the benefits of 20-mph zones rather than 20-mph limits. They noted that 20-mph zones required a suite of measures to produce traffic calming, which they said contributed to slowing down drivers and also to a more cautious attitude in all road users. They said this contrasted with the proposed 20mph limit in Brighton and Hove.

UBM said that 'evidence' should be given a legal definition, where a fact must be proven beyond reasonable doubt. They said that many of the studies relied upon by the Council were not directly relevant and non-transferable, and that they made assumptions without producing any evidence at all. They believed that if the word 'evidence' was given its legal definition, these studies would fall short of this test and the phrase "total lack of evidence" would be justified.

2. UBM said it was not contentious that the Council hoped to proceed with Phase 2 and then Phase 3. They referred to a page of Brighton and Hove Council's website that said the programme was planned to be rolled out city-wide over the next two to three years, with consultation on Phase 3 following the work on the Phase 2 areas. They said the reference to "ploughing on regardless" referred to the failure to wait for local evidence before deciding on a course of action. They reiterated that the language of the ad should be understood in its context as a political ad seeking to draw attention to the Council's political aims and the perceived lack of local evidence behind its plans.

3. UBM said this comment aimed to show there was a risk of this effect occurring as a result of the Council's policy to put in place 20-mph speed limits. They said it could be expected that reductions in traffic speeds would be off-putting for potential visitors to the city centre. They added that this echoed concerns expressed by the Tourism Alliance, a business organisation within Brighton, about the implications for local business and tourism of the 20-mph speed limit policy, which it had expressed to them and publicly. They

provided an article that quoted a Tourism Alliance official as saying, "... studies have shown that if traffic is held in a slow moving queue for any length of time 30 per cent of journeys will be abandoned. That means 30 per cent fewer car loads of customers coming into the city centre at peak trading times."

4. UBM said the wording of the ad made clear that the comment about the advice from legal experts was not general, but referred specifically to the bullet points that followed in the box immediately below, which were the direct subject of points 5 to 8.

UBM said their members had used lawyers to support their own complaints to Brighton and Hove Council, but they did not wish to disclose the content of any legal advice received. They said they had carried out research into deficiencies in the published evidence-base on which the Council relied, and had discussed this with one of their legal advisors prior to the ad being placed. They said their members then engaged their lawyers further to prepare and submit their response to the Phase 2 Consultation. They provided a copy of their consultation response and said it made clear that there were numerous arguable legal difficulties with the Council's decision to proceed with Phase 2 because of the lack of evidence to support the Council's findings'. The response noted that the Road Traffic Regulation Act 1984 and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 obliged the Council to consult those organisations representing persons likely to be affected by any provision. UBM said the Council had acknowledged the taxi industry was one such organisation. The response also said the Council was obliged by case law to ensure the consultation complied with the minimum standards of an effective consultation, as set out in *R v North East Devon Health Authority, ex parte Coughlan* [2001]. The response concluded that the Council's consultation process did not comply with the legal requirements because of the lack of evidence to support the proposals and the Council's biased approach preventing consultees responding effectively.

5.-8. UBM said on a proper reading of the ad, these complaints simply detailed the ways in which legal experts had raised concerns regarding the Council's findings and actions. They noted that the box containing these claims in the ad was immediately below the statement "Legal experts have poured scorn on the council's findings ...". They pointed out that all of the claims complained about reflected points that their consultation response had made regarding lack of evidence. They said these comments should be treated as a reflection of what lawyers had argued on their behalf and of others, rather than as claims in their own right.

They added that each of these statements related to a lack of local evidence, and to evidence specifically rather than aspirations or forecasts. With regard to providing substantiation for their claims, UBM said that proving a negative was difficult, but to the best of their knowledge, what these claims pointed to was the lack of specific local evidence behind the Council's proposals. They said if the Council had any specific evidence on which it had relied, UBM would be grateful to see it. They also said that beyond the lack of specific

local evidence, with regard to points 6, 7 and 8 of the complaint in particular, they were not aware of any evidence relied on by the Council to support their proposals.

With regard to point 6 of the complaint, UBM said that in its Speed Reduction Review of May 2010 (through its 20mph Speed Limits/Zones Scrutiny Panel), Brighton and Hove Council had admitted "Research which has been conducted on the effects of 20mph speed limit/zones on carbon emissions and pollution have been largely inconclusive. The information regarding the impact of lower speeds on air quality is very mixed with almost the same amount of research stating that slower speeds have a positive effect on the environment as those stating that slower speeds have a negative impact".

9. UBM said this comment must be understood in context, not to refer to total ignorance on the part of the Brighton and Hove Council of the Portsmouth County Council evaluation, but rather a decision to adopt an approach that did not adequately take it into account. They said the Council's failure to take any, or any substantial notice of this evaluation was evidenced by a BBC local radio interview with a local councillor, of which they provided a copy, in which he said "... the experience of Portsmouth is very recent, it's only gone in in the last couple of years, so time is needed to accrue robust data ... but, yeah ... but twenty-mile per hour speed limits have existed in many areas particularly in London for many, many years and there is robust evidence from the Department for Health and Public England that ...and Public Health England that reducing speed limits makes mmm - yeah - reduces casualties."

10. UBM said the Department for Transport's evaluation of the implementation of 20-mph speed limits in Portsmouth (the Atkins report) indicated that the change in casualty numbers by road user type and injury severity, showed that pedestrians killed or seriously injured had increased by three per cent for the two-year period after the implementation of 20-mph limit compared to the three-year period prior to its implementation. Pedestrians killed or seriously injured in the 20- to 69-year-old category had increased by 307% for the two-year period after implementation of the 20-mph limit compared to the three-year period prior to its implementation. When asked for a further breakdown of these statistics, UBM supplied a link to a page on the BBC website entitled "Crash: Death on Britain's roads", which showed an interactive map that used Department for Transport data to mark out the locations, dates and times of every death on the roads of Britain between 1999 and 2008. The maps showed that in Portsmouth, three people were killed in 2006, two people were killed in 2007 and eight people were killed in 2008. UBM also noted that none of the fatalities in 2008 happened before March, when the implementation of the Portsmouth 20 mph was completed, which they believed proved that the scheme was responsible for the increase in fatal road traffic accidents.

UBM said it may be considered that the true cause of the increase in fatal road traffic accidents was one or more extraneous factors, such as increased pedestrianisation of the area, but they considered that this did not change the underlying fact that the statistics showed a clear link between the Portsmouth policy change and increased numbers of people being killed or seriously injured.

11. UBM acknowledged that the ad did not make the identity of the advertiser clear. However, they said it was clear from the ad that it was advocating a particular political viewpoint on behalf of an interest group, in particular from the reference to "other city businesses and council tax payers". They said there was nothing in it that would make the absence of the identity of the advertisers misleading. They also said they were not aware that they were under any specific legal obligation to identify themselves in the ad and neither had, the Brighton Argus advised them of this. They said they were not trying to hide their identity in any way, as was evident from the clear identification of "Unchain the Brighton Motorist" in their subsequent adverts. UBM said they were happy to ensure that they continued to be identified in future publications.

UBM assured us that they neither intended to republish the original ad nor to repeat any of the claims that were the subject of the complaints.

Assessment

The ASA noted that UBM believed the ad fell outside the remit of the BCAP Code as it was one of a number of ads published with the broad aim of influencing local politics. However, we considered the ad was within our remit as its main aim seemed to be encouraging people to visit the Council's website to state their opposition to a planning proposal, drawing on the various arguments presented in the ad. Readers were not being called upon to vote in a particular way in an election or referendum, but rather to respond to a local government consultation, and while an aim of the ad may have been to influence people away from a political party, the party was not specifically named or attacked in the ad. While we acknowledged the UBM's belief that the Council would only use the word 'mandate' when referring to a referendum and the fact people were asked to vote as part of the consultation made it equivalent to a referendum, we were assured that there had been no official local referendum, which would be named as such and would compel the Council to act.

1. Upheld

We understood that UBM believed that given the context of the ad, and the fact that it appeared in a local paper, readers would understand "total lack of evidence" to mean a lack of local evidence to support the Council's specific plans. We noted that UBM accepted that there were studies that suggested certain benefits of 20-mph limits in other areas as well as studies that showed negative impacts of reducing speed limits. While we acknowledged that UBM questioned the applicability and validity of some of the studies they believed the Council had relied on, we considered that the phrase "total lack of evidence" implied that there was no evidence whatsoever, regardless of its quality. We understood that UBM believed the Council had rushed through the proposals, but as they had acknowledged that some studies existed, which we considered the average consumer would consider constituted 'evidence', we concluded that the claim was misleading.

On this point, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

2. Upheld

We noted that UBM said it was not contentious that the Council hoped to proceed with Phase 2 and then Phase 3, but we considered that the phrase "ploughing on regardless" implied that a decision had already been made. We noted that the page of Brighton and Hove Council's website to which UBM referred stated that once the consultation had closed, the responses would be considered along with other information and the final proposal would go to the Environment, Transport & Sustainability Committee in December 2013. The web page stated that if agreed, the Speed Limit Orders would be advertised and there would follow another opportunity to support or oppose the proposals, before final decisions were taken by the Environment, Transport and Sustainability Committee in early 2014. We considered UBM's point that the language of the ad should be understood in its political context, but we concluded that the language used implied a decision had already been made, and in the absence of evidence to substantiate this, the claim was misleading.

On this point, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

3. Upheld

We noted UBM's comment that this claim aimed to highlight a risk of damage to the local economy and tourism as a result of 20-mph speed limits. However, we considered that the language used implied that these were inevitable consequences of the Council's proposals. We understood that UBM believed reductions in traffic speeds would be off-putting for potential visitors to the city centre. We recognised that the Tourism Alliance had been quoted as stating that studies showed that if traffic was held in a slow moving queue for any length of time, 30% of journeys would be abandoned, but we noted that we had not been provided with copies of these studies or seen how the 30% had been calculated. We considered that UBM had not provided sufficient evidence to prove that tourism would be directly affected by the proposals, and we concluded that the claim was misleading.

On this point, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

4. Upheld

We noted UBM's statement that its members had consulted lawyers, but they did not wish to disclose the content of any legal advice received. We also noted UBM's comment that they had sought legal advice when preparing their response to the consultation, and we considered that the response did fit the description of "pouring scorn" on the findings. However, in the absence of any evidence to prove what legal experts had advised and how they had specifically "poured scorn" on the findings of the Council, we considered that this claim could not be verified and was therefore misleading.

On this point, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

5.-8. Upheld

We considered UBM's comment that these claims should be read in conjunction with the claim "Legal experts have poured scorn on the council's findings ...", and we considered whether the claims were misleading in that context. However, we again noted that we had not seen evidence to prove that legal experts had made these claims. Furthermore, even if legal experts had made these claims and considered them to be accurate, we had not seen evidence to prove that they were incorrect. We understood UBM's point that it was difficult to prove a negative, and that to the best of UBM's knowledge, the claims reflected the Council's lack of specific local evidence behind its proposals. However, as UBM had made the claims, it was their responsibility to provide evidence to substantiate them, and the fact that UBM was not aware of this evidence did not mean that it did not exist. We considered UBM's statement that each of these claims related to a lack of local evidence, and not aspirations or forecasts, but we noted that all of the claims were absolute in stating "no evidence", rather than questioning the amount or validity of evidence the Council had presented. We acknowledged UBM's reference to the Council's Speed Reduction Review, which stated that research had been "largely inconclusive" and information regarding the impact of lower speeds on air quality was "very mixed", but as the claims stated there was "no evidence", rather than questioning the strength of the evidence, we concluded that the claims were misleading.

On these points, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

9. Upheld

We considered UBM's comment that this claim should be understood as meaning that the Council was not ignorant of the evaluation, but did not adequately take it into account. However, we considered that the wording of the claim did not make this clear. Rather than questioning the way in which Brighton and Hove City Council had interpreted Portsmouth City Council's evaluation of their introduction of a 20 mph scheme, the claim suggested that Brighton and Hove City Council had failed to consider the evaluation, and for that reason, we concluded that the claim was misleading.

On this point, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

10. Upheld

We accepted that the statistics quoted by UBM from the Atkins report and the BBC News page were correct. However, we noted that the ad claimed that Portsmouth City Council's scheme "resulted" in the increase in fatal road traffic accidents. We considered that the number of fatalities in Portsmouth significantly increased in 2008 when compared to 2006 and 2007, and we noted that none of the fatalities in 2008 had happened before the completion

of the implementation of the 20-mph scheme. However, we also noted that the same BBC map showed that 12 people were killed in Portsmouth in 2005, before the scheme had been implemented. In the absence of evidence demonstrating that the introduction of the scheme directly caused the increased fatalities, we considered that the scheme could not be said with certainty to have "resulted" in increased fatalities. We concluded that a number of factors other than Portsmouth City Council's scheme could have affected the statistics and the claim was therefore misleading.

On this point, the ad breached rules 3.1, 3.3 (Misleading advertising) and 3.7 (Substantiation) of the CAP Code (Edition 12).

11. Upheld

We acknowledged UBM's point that the ad clearly advocated a political viewpoint on behalf of an interest group and we appreciated that they were not aware of a need to identify themselves. We also noted that other ads had named UBM and they had provided their assurance that they would ensure they were identified in future ads. However, on this occasion we noted that it was not clear who the advertiser was, and we considered it was misleading not to include the identity of the advertiser in this ad.

On this point, the ad breached rule 3.5 (Misleading advertising) of the CAP Code (Edition 12).

Action

The ad must not appear again in its current form. We told Unchain the Brighton Motorist not to repeat the claims, to ensure that they had evidence to substantiate future claims and to ensure that they were clearly identified in future ads.

Subject:	Area E Resident Parking Scheme - Traffic Regulation Order Consultation		
Date of Meeting:	4th March 2014		
Report of:	Executive Director – Environment, Development or Housing.		
Contact Officer:	Name:	Charles Field	Tel: 29-3329
	E-mail:	charles.field@brighton-hove.gov.uk	
Wards Affected:	Withdean		

FOR GENERAL RELEASE**1. SUMMARY AND POLICY CONTEXT:**

- 1.1 The purpose of this report is to address comments and objections to the draft traffic regulation orders. The traffic orders outline a proposed resident parking scheme (Area E Residents Parking Scheme – Preston Park Station North area). The proposed scheme is Monday to Friday 9am-8pm (Appendix A). Double Yellow Lines were also advertised for consultation through a Traffic Regulation Order in Withdean Avenue and Withdean Road in response to concerns from residents about displacement (Appendix B) Permission to proceed with the consultation was agreed at the Environment, Transport & Sustainability Cabinet Member meeting on 9th November 2011.

2. RECOMMENDATIONS:

- 2.1 That, having taken account of all duly made representations and objections, the Committee approves as advertised the following orders;
- (a) Brighton & Hove Various Controlled Parking Zones Consolidation Order 2008 Amendment Order 2008 No.* 201*
 - (b) Brighton & Hove Outer Areas (Waiting, Loading and Parking) and Cycle Lanes Consolidation Order 2013 Amendment No.* 201*
- 2.2 That the Committee notes that any amendments included in the report and subsequent requests deemed appropriate by officers will be added to the proposed scheme during implementation subject to advertisement and approval as an amendment Traffic Regulation Order.

3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

- 3.1 In 2007, the residents of the Preston Park Station North area voted to be excluded from the proposed Zone 'A' (Original Preston Park Station Area) resident parking scheme, and therefore, these roads were not included within the proposed scheme.
- 3.2 Since then and the further inclusion of Tivoli Crescent into a resident parking scheme in 2011, this area has experienced parking pressures and the council has received requests to look at these locations again to see whether support for a residents parking scheme has changed.

- 3.3 At the Environment Cabinet Member Meeting on 9th November 2011 it was agreed to consult these residents again to determine whether they would like the opportunity to join neighbouring residents parking schemes.
- 3.4 In September 2013 a leaflet and questionnaire giving details about proposals for a resident parking scheme was sent to all property addresses in the area to the North of Preston Park Station (318 property addresses).
- 3.5 Plans could also be viewed at exhibitions staffed by officers from Brighton & Hove City Council at: Church of the Good Shepherd (Dyke Road), 1pm to 5pm, Tuesday 17 September and 4pm to 8pm, Wednesday 18 September. There was also an unstaffed exhibition at Hove Town Hall, Norton Road from Monday 2 September, 2013 to Friday 11 October, 2013, 9am to 5pm.
- 3.6 182 responses were received giving a response rate of 57%. The following responses were not included within this figure: Responses from outside the area (9) or where no street name was given (1). Also not included were 10 duplicates (only one response was included from each household).
- 3.7 To clarify, a section of the east side of Dyke Road (280-346 – even numbers) is contained within the proposed traffic order as eligible for an Area E permit (schedule 18.1 within the traffic order). This section of Dyke Road is not part of the scheme itself physically on the ground; however, residents on this section of the east side of the road were included in the consultation as they would be able to apply for Area E permits as part of the residents eligible for permits within the scheme. This is because we are proposing double yellow lines right outside these properties without an opportunity to park safely nearby.
- 3.8 Overall, 50% of respondents were in favour of an extension to the Residents Parking Scheme and 50% of respondents were against an extension to the scheme.
- 3.9 Analysis took place of all the comments received from residents in the proposed area and it was clear that views were very mixed but the most frequently occurring comment by those both supporting and against the proposed scheme was that the current parking problems were caused by commuters particularly during the week and that there were no parking problems at weekends. Apart from general support, negative comments and views that a scheme wasn't needed, the next most frequently made comment related to concerns about visitor parking which were either the cost, the amount of permits allowed, how it would restrict visitors for elderly and general concerns about visitors at weekends.
- 3.10 It is clear from the comments received as part of the questionnaires that residents who both support and oppose the scheme have concerns about restrictions being applied at the weekend. Therefore, it was recommended to take into account these comments and a Monday to Friday only stand alone resident parking scheme was proposed for further traffic order consultation (this is based on the fact the consultation result was split 50/50 but a large amount of comments were received from both residents in support and opposed to the resident parking scheme who had concerns about weekend restrictions as they were seen to be either not required and / or would limit visitor parking).

- 3.11 Officers met with all the Ward Councillors who have voiced their support for this way forward. However, they have outlined their concerns about displacement which were also received from a number of residents adjacent to the proposed scheme.
- 3.12 The Council have responded to these concerns and are proposing double yellow lines on one side of the road in Withdean Road and Withdean Avenue as outlined in Appendix B.
- 3.13 In terms of Hazeldene Meads and The Beeches any potential parking in this area would cause obstruction issues rather than Road Safety issues. However, if a scheme is approved the Council will meet up with representatives from these roads within three months after any operational start to discuss the way forward and the options available if problems occur.
- 3.14 Therefore, the recommendation on 26th November 2013 in the report to the Environment, Transport & Sustainability Committee was that this Monday to Friday proposal is recommended to be advertised as a traffic order allowing further comments to be made from residents both within and outside the new proposal (Appendix A). Leaflets were also sent directly to residents making them aware of the traffic order and how to make their views known. All comments would be reported back to this Environment, Transport & Sustainability Committee meeting. This was approved at the meeting on the 26th November.

4. CONSULTATION

- 4.1 The draft Traffic Regulation Order (TRO) was advertised on 13th January 2014 with the closing date for comments and objections on 4th February 2014.
- 4.2 The Ward Councillors for the areas were consulted, as were the statutory consultees such as the Emergency Services.
- 4.3 Notices were put on street for 10th January 2014 which outlined the proposal. The notice was also published in The Argus newspaper on 13th January 2014. Detailed plans and the Traffic Regulation Order were available to view at the City Direct Offices at Bartholomew House and Hove Town Hall. A plan detailing the proposals is shown on Appendix A & B.
- 4.4 The documents were also available to view and to respond to directly on the Council website.

Preston Park Station North area

- 4.5 There were 203 items of correspondence received to the Preston Park Station North area proposal. All 203 items were received from individuals and included support, objections and general comments. The comments / objections are listed in Appendix C.
- 4.6 62 items of correspondence were support for the proposals due to the parking problems in the area. 141 items of correspondence were objections to the proposals. The 203 items objecting included 165 from within the proposed area, 38 from outside the proposed area and a further 11 were discounted as addresses were not disclosed.
- 4.7 The support and objections by road are outlined in Appendix D. To put the responses into some context the support / objections / comments from previous resident parking schemes

since 2009 is outlined in Appendix E. Only twice in this period has there been more support than objections during the formal TRO stage and this was for single road extensions to schemes (Preston Park Avenue and Canning Street). The formal TRO stage is seen as a period to outline concerns rather than put forward support again as this would have been represented during the initial consultation period.

Support

- 4.8 The 62 representations that supported the scheme contained 7 different types of reasons to support the resident parking proposals (some residents / businesses outlined more than one type of reason for their objection).
- 4.9 36 of the representations were outlining that the scheme is needed.
- 4.10 12 of the representations were support for the revised weekday change and / or that it was a sensible compromise.
- 4.11 12 of the representations were support for the resident parking scheme but would have preferred seven day restrictions.
- 4.12 12 of the representations were general support for the resident parking scheme.
- 4.13 9 of the representations were support for the double yellow lines on Dyke Road.
- 4.14 1 of the representations was support for the double yellow lines on Withdean Avenue / Road.
- 4.15 1 of the representations was support for the resident parking scheme but reluctant about costs.

Objections

- 4.16 The 141 representations that objected contained 15 different types of reasons to object to the resident parking / double yellow line proposals (some residents / businesses outlined more than one type of reason for their objection). These objections are all responded to in the following paragraph in sequence.
- 4.17 104 of the representations were that the change was not supported by the majority.
- 4.18 Paragraphs 3.7 to 3.9 above outline the reasons why a Monday to Friday scheme is being proposed based on the responses from the previous consultation.
- 4.19 102 of the representations were due to no parking problem being perceived in the area and no scheme was needed.
- 4.20 Several residents in this area have been requesting parking controls to the Council and that is the why the Council agreed to include this area in the resident parking scheme priority timetable. Permission to proceed with the consultation was agreed at the Environment, Transport & Sustainability Cabinet Member meeting on 9th November 2011. There was also a previous resident / Ward Councillor survey in the area presented to the Environment Committee on 3rd February 2011.

- 4.21 92 of the representations were regarding the consultation process and / or that the process has been undemocratic / inadequate.
- 4.22 The consultation process has been extensive and is clearly outlined in this report and the background papers outlined below. All households that would be eligible for resident permits / visitor permits were included in the result of the consultation.
- 4.23 9 of the representations were that this is a waste of money for the Council, they do not want to pay to park and this will impose several restrictions.
- 4.24 When introducing new residents parking schemes the Council must demonstrate that these would be self financing. This is why charges have to be made for On-street parking through permits and pay & display. The Council do have to charge residents for permits for the schemes as the schemes have ongoing costs i.e. civil enforcement officers, maintenance of signage and lining etc. Any surplus from the revenue received from the proposed parking schemes goes back into transport and environmental improvements throughout the City.
- 4.25 8 of the representations were concerned that displacement would occur.
- 4.26 The council is aware that the introduction of a parking scheme may cause some displacement into adjacent areas, although to what level is very hard to predict. This is because driver behaviour change and where vehicles may go cannot be known in advance of a scheme introduction (e.g. some commuters using the local area may choose alternative means of travel or pay to park within the scheme). However, previous experience has shown that there can be a degree of displacement to neighbouring areas. Equally officers feel that not to proceed with a scheme in the proposed area would not be fair on residents suffering parking pressures and safety issues. The Council have responded to specific concerns and are proposing double yellow lines on one side of the road in Withdean Road and Withdean Avenue as outlined in Appendix B. In terms of Hazeldene Meads and The Beeches any potential parking in this area would cause obstruction issues rather than Road Safety issues. However, if a scheme is approved the Council will meet up with representatives from these roads within three months after any operational start to discuss the way forward and the options available.
- 4.27 7 of the representations object to or have concerns about the double yellow lines on Withdean Road / Avenue.
- 4.28 The Council have responded to road safety concerns about vehicle displacement and are proposing double yellow lines on one side of the road in Withdean Road and Withdean Avenue as outlined in Appendix B.
- 4.29 6 of the representations were a general objection or that other solutions were required.
- 4.30 4 of the representations object to the double yellow lines on Dyke Road.
- 4.31 It is felt these double yellow lines are required to prevent parking on the advisory cycle lane which may become greater due to vehicle displacement if these lines were not proposed. There has been support for the double yellow lines during the previous consultation and the traffic consultation (see Paragraph 4.12 above).

- 4.32 4 of the representations received were unhappy about the hours of the scheme or requested that a light touch parking scheme should be considered.
- 4.33 In the Citywide Parking Review report that was presented to Transport Committee on 15th January 2015 it was approved that no new further stand alone light touch schemes are proposed. This is due to a number of issues outlined in the report including increased displacement and lack of flexibility for visitors. The hours proposed during the week are in line with the current Area A resident parking scheme to prevent displacement from that scheme particularly in the early evenings.
- 4.34 3 of the representations received were unhappy at the reduction of resident parking spaces available due to various reasons such as double yellow lines across driveways and at junctions.
- 4.35 Double yellow line restrictions will apply across all vehicle accesses. Whilst this means that residents or their guests will not be able to park across a garage or drive access, it will ensure that these remain unblocked and enforceable by the civil enforcement officers at all times. Double yellow lines are also placed on junctions for safety reasons.
- 4.36 1 of the representations was concerned that the proposals would affect local facilities due to the charges.
- 4.37 Officers have considered the parking needs and comments on the design have been considered. In some cases alterations have been made to bays in the area such as more pay & display bays for visitors. There were also a number of parking policy issues which does not come under the remit of this consultation; however, comments have been passed onto the relevant department to take into consideration. As with all the parking schemes introduced into Brighton and Hove the objective is to find the right balance of residents, business and daily parking for a local area. The introduction of a scheme will require that all day parkers and visitors using parking places will pay for their use. The consultation on the parking scheme is reflecting the fact that too many vehicles are trying to use this area or may park in certain roads if a scheme is introduced in other roads and a system for managing this situation has been requested by local residents.
- 4.38 1 of the representations did not want unsightly pay & display machines or signage in their area.
- 4.39 The Council has considered the issue of additional street furniture causing street clutter and difficulties on narrow pavements. Therefore, the Council will be putting down the minimal signing / machines possible to allow enforcement and will take into consideration pavement widths.
- 4.40 1 of the representations was that this proposal won't solve the parking problems overnight.
- 4.41 The 9am-8pm resident parking scheme proposal was designed by officers as it was felt this would be the best scheme for the area taking into account comments received and previous experience of implementing resident parking schemes over the last few years.
- 4.42 1 of the representations outlines this will affect commuters.

- 4.43 As with all the parking schemes proposed in Brighton and Hove the objective is to find the right balance of residents, business and daily parking for a local area. The introduction of a scheme will require that commuters using parking places will pay for their use.
- 4.44 1 of the representations is concerned that this is a divisive scheme and a Citywide Parking Review is required.
- 4.45 A Citywide Parking Review was undertaken by the Council and the results of this were presented to the Transport Committee on 15th January 2013.

Conclusions

- 4.46 The 203 Items of correspondence from residents within the proposed scheme is broken down by road in Appendix D with support and objection in comparison to the previous consultation results.
- 4.47 It is important that the Committee notes that as outlined in Appendix D from the original consultation area (where there was 91 for and 91 against in a private vote) there are 60 items of support and 105 objections to this more recent traffic order.
- 4.48 It is also important to consider that just over 60 of the representations in objection were handed in together in the same envelope with the same letter text and each signed individually. This indicates that possibly an organised door-to-door survey took place and letters may not have been signed privately as opposed to the previous consultation. A number of the submissions were also from the same household (in some cases three family / household members) as opposed to the original consultation which was one submission per household.
- 4.49 To put the responses into some context the support / objections / comments from previous resident parking schemes since 2009 is outlined in Appendix E. Only twice in this period has there been more support than objections during the formal TRO stage and this was for single road extensions to schemes (Preston Park Avenue and Canning Street).
- 4.50 The formal TRO stage is seen as a period to outline concerns rather than put forward support again as this would have been represented during the initial consultation period.
- 4.51 The Withdean Ward Councillors have been made aware of the consultation responses and the context outlined above and support the officer recommendations.
- 4.52 Therefore, the recommendation is that this parking scheme proposal and double yellow lines be progressed due to the reasons outlined within the relevant background and following the consideration of all the consultation responses.
- 4.53 Any amendments included in the report and subsequent requests deemed appropriate by officers will be added to the proposed scheme during implementation subject to advertisement and approval as an amendment Traffic Regulation Order.
- 4.54 As part of the consultation undertaken in the scheme regard has been given to the free movement of traffic and access to premises since traffic flow and access are issues that have generated requests from residents and in part a need for the measures being proposed. The provision of alternative off-street parking spaces has been considered by officers when designing the schemes but there are no opportunities to go forward with any

off street spaces due to the existing geographical layout of the areas and existing parking provisions in the areas.

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 5.1 Capital: New parking schemes are capital projects which are funded by unsupported borrowings, and repaid from revenue over 7 years, using the income generated.

Revenue: income generated from on-street parking schemes is first defrayed against relevant expenditure with any surplus used for transport and highways related projects and expenditure such as supported bus services, concessionary fares and Local Transport Plan projects.

Finance Officer Consulted: Jeff Coates Date: 06/02/2014

Legal Implications:

- 5.2 The Council regulates traffic by means of orders made under the Road Traffic Regulation Act 1984 ("the Act"). Procedural requirements are contained in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and require public notice of orders to be given. Any person may object to the making of an order. Any unresolved objections to an order must be considered by the Environment, Transport & Sustainability Committee before it can be made.

The Act allows the Council as traffic authority to provide parking metres for the purpose of its functions in relation to designated parking places.

Lawyer Consulted: Hilary Woodward Date: 10 February 2014

Equalities Implications:

- 5.3 The proposed measures will be of benefit to many road users.

Sustainability Implications:

- 5.4 The new motorcycle bays will encourage more sustainable methods of transport.
- 5.5 Managing parking will increase turnover and parking opportunities for all.

Crime & Disorder Implications:

- 5.6 The proposed amendments to restrictions will not have any implication on the prevention of crime and disorder.

Risk and Opportunity Management Implications:

- 5.7 Any risks will be monitored as part of the overall project management, but none have been identified.

Corporate / Citywide Implications:

- 5.8 The legal disabled bays will provide parking for the holders of blue badges wanting to use the local facilities.

6. EVALUATION OF ANY ALTERNATIVE OPTION(S):

- 6.1 The only alternative option for the proposals is doing nothing which would mean the proposals would not be taken forward. However, it is the recommendation of officers that these proposals are proceeded with for the reasons outlined within the report.

7. REASONS FOR REPORT RECOMMENDATIONS

- 7.1 To seek approval of the schemes to the implementation stage after taking into consideration of the duly made representations and objections. These proposals and amendments are recommended to be taken forward for the reasons outlined within the report.

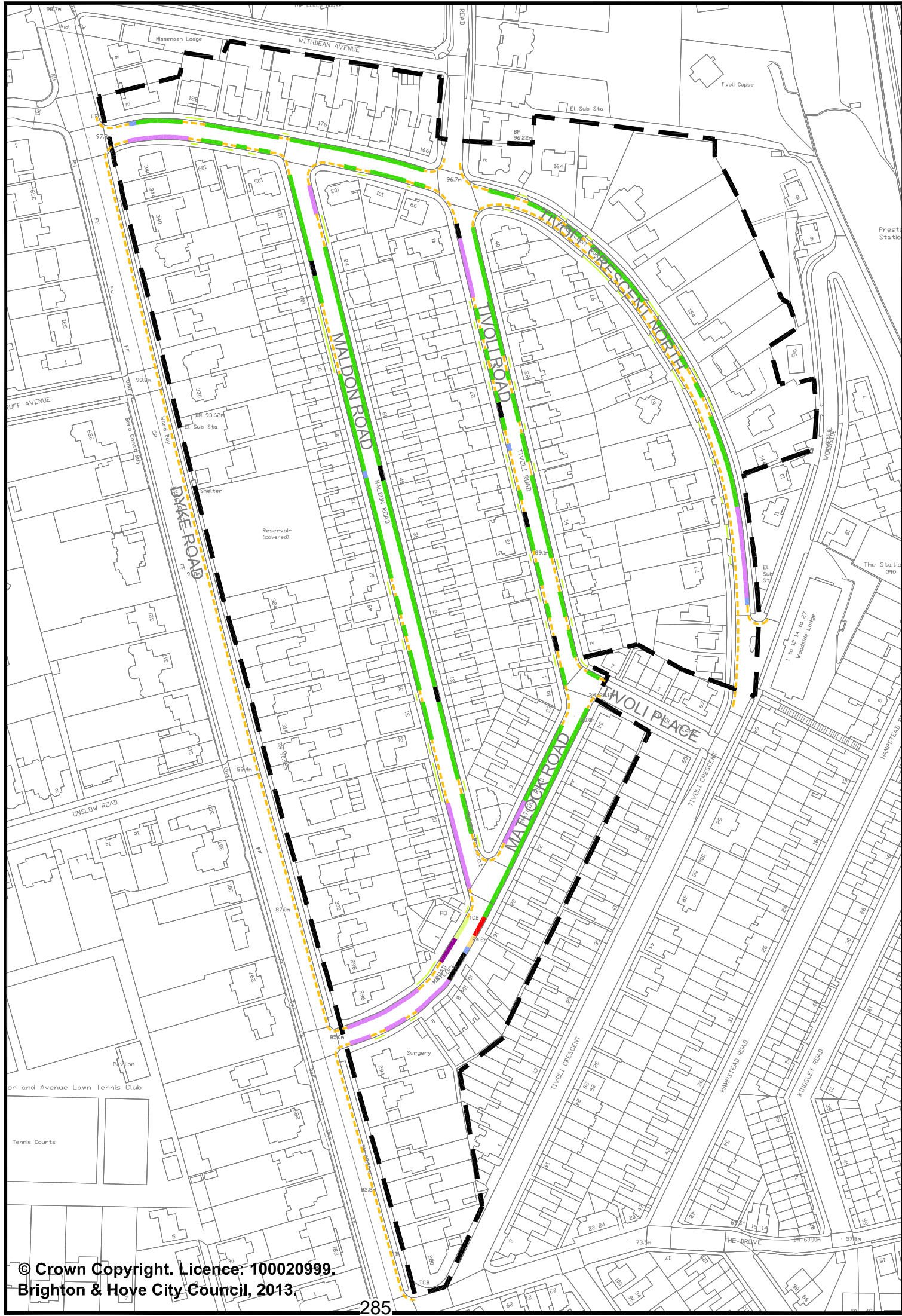
SUPPORTING DOCUMENTATION

Appendices:

1. Appendix A – Preston Park Station North area Plan
2. Appendix B – Withdean Road / Avenue Plan.
3. Appendix C - Preston Park Station North area - List of Objections / Comments
4. Appendix D – Support / Objections – Road by Road Analysis
5. Appendix E – Recent consultation results.

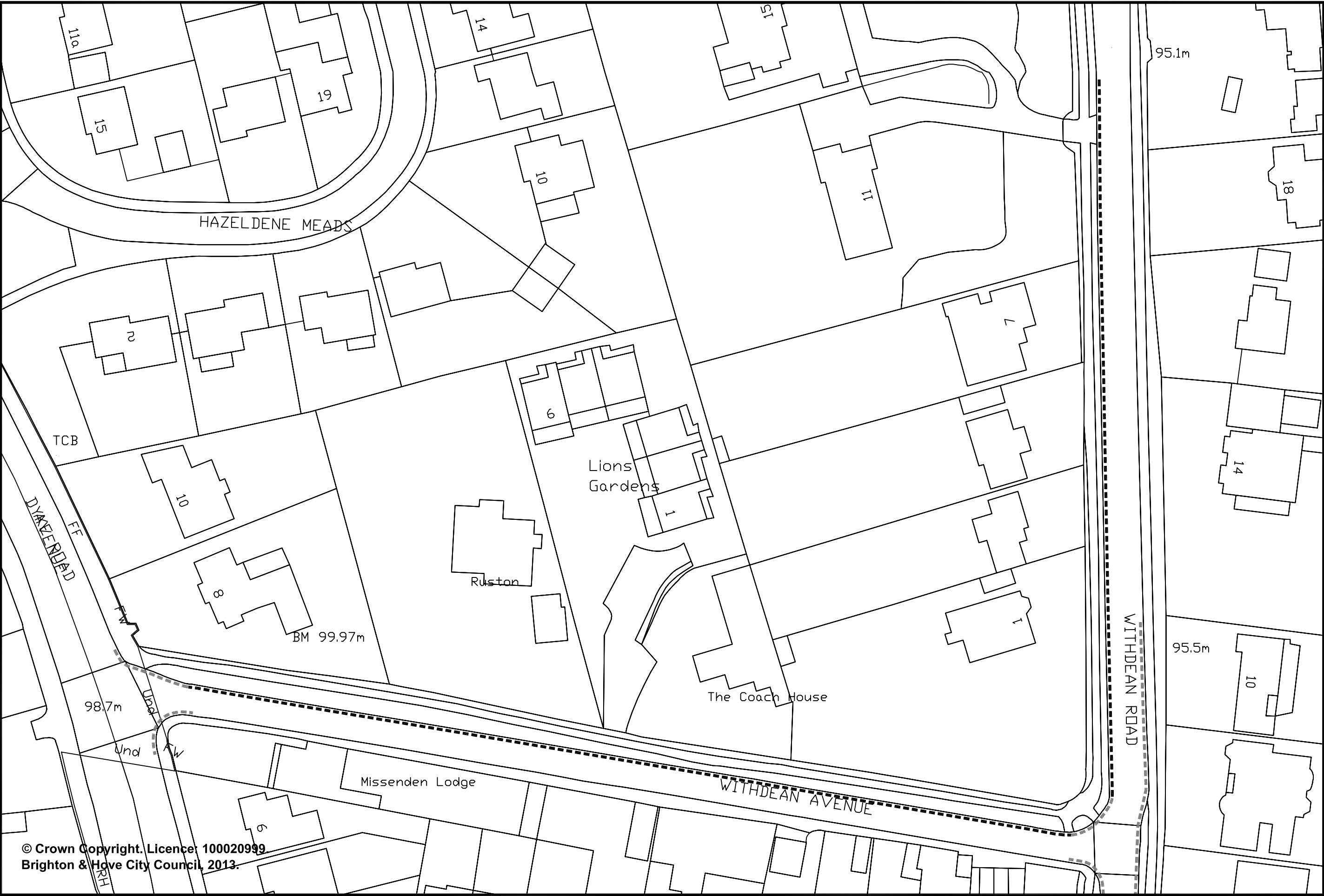
Background Documents

1. Item 90 – Environment Committee Meeting Report – 3rd February 2011
2. Item 43 - Environment Cabinet Member Meeting Report – 9th November 2011
3. Item 49 – Transport Committee Meeting Report – 15th January 2013
4. Item 51 – Environment, Transport & Sustainability Committee Meeting Report – 26th November 2013.



- KEY:**
- CONSULTATION BOUNDARY
 - CROSSOVER
 - - - NO WAITING AT ANY TIME (DOUBLE YELLOW LINES)
 - PERMIT HOLDERS ONLY (Monday - Friday, 9am - 8pm)
 - Exclusive P&D 2 hour stay no return within 4 hrs (Monday - Friday, 2hr 9am - 6pm)
 - CAR CLUB SPACE
 - SHARED PERMIT HOLDERS & MEDIUM TERM PARKING (up to 4 hours) (Monday to Friday, 9am - 8pm)
 - DISABLED BAY
 - LOADING BAY
 - MOTORCYCLE BAY
 - PEDAL CYCLE PARKING PLACE

APPENDIX A



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KEY

- | | | | |
|-------|------------------------------|-------|------------------------------|
| ----- | Existing double yellow lines | ----- | Proposed double yellow lines |
|-------|------------------------------|-------|------------------------------|

APPENDIX B

APPENDIX C – Items of Support – Area E

No.	Who	Contents
1	Resident - Dyke Road	Double yellow lines will make it safer
2	Resident - Dyke Road	Double yellow lines will make it safer
3	Resident	General support for scheme
4	Resident - Dyke Road	Support for scheme and yellow lines
5	Resident - Lions Gardens	Support for Double yellow lines on Withdean Av.
6	Resident - Matlock Road	Revised changes meet needs of residents and respond to objections to the first proposal.
7	Resident - Maldon Road	Sensible Compromise, Need scheme.
8	Resident - Matlock Road	Agree with weekday proposals.
9	Resident - Tivoli CresNth	General support for scheme
10	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
11	Resident - Tivoli Cres Nth	In full support of revised proposals and need scheme.
12	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
13	Resident - Matlock Road	General support for scheme and needed.
14	Resident - Matlock Road	Support scheme although reluctant about costs
15	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
16	Resident - Tivoli Cres Nth	Support revised proposal
17	Resident - Tivoli Cres Nth	Support revised proposal
18	Resident - Tivoli Road	Scheme is needed although would prefer seven day scheme.
19	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
20	Resident - Tivoli Cres Nth	Sensible Compromise, Need scheme.
21	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
22	Resident - Tivoli Cres Nth	General support for scheme
23	Resident - Tivoli Cres Nth	General support for scheme and needed.
24	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
25	Resident - Dyke Road	Double yellow lines will make it safer.
26	Resident - Maldon Road	Scheme is needed although would prefer seven day scheme.
27	Resident - Tivoli Cres Nth	General support for scheme and needed.
28	Resident - Dyke Road	Double yellow lines will make it safer.
29	Resident - Matlock Road	General support for scheme and needed.
30	Resident - Matlock Road	Support revised proposal
31	Resident - Dyke Road	Double yellow lines will make it safer.
32	Resident - Tivoli Cres Nth	Support the revise plan as it is needed.
33	Resident - Matlock Road	General support for scheme and needed.
34	Resident - Tivoli Cres Nth	Support the revise plan as it is needed.
35	Resident - Dyke Road	Double yellow lines will make it safer.
36	Resident - Dyke Road	Double yellow lines will make it safer.
37	Resident - Tivoli Cres Nth	A sensible compromise
38	Resident - Tivoli Cres Nth	General Support
39	Resident - Matlock Road	Need scheme
40	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
41	Resident - Matlock Road	Need scheme
42	Resident - Matlock Road	General Support

43	Resident - Matlock Road	Need scheme
44	Resident - Matlock Road	Need scheme
45	Resident - Matlock Road	Need scheme, concerns about permit allocation and car club bay.
46	Resident - Matlock Road	Need scheme
47	Resident - Matlock Road	General Support
48	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme. Concerns about disabled bays.
49	Resident - Maldon Road	Need scheme
50	Resident - Tivoli Road	Need scheme
51	Resident - Tivoli Road	Need scheme
52	Resident - Maldon Road	Need scheme
53	Resident - Maldon Road	Need scheme. Concern about motorcycle bay.
54	Resident - Dyke Road	Double yellow lines will make it safer
55	Resident - Tivoli Road	Sensible Compromise, Need scheme.
56	Resident - Matlock Road	Scheme is needed although would prefer seven day scheme.
57	Resident - Matlock Road	Need scheme
58	Resident - Tivoli Cres Nth	Need scheme
59	Resident - Tivoli Cres Nth	Scheme is needed although would prefer seven day scheme.
60	Resident - Maldon Road	Need scheme
61	Resident - Tivoli Road	Need scheme
62	Resident - Tivoli Road	Need scheme

APPENDIX C – Items of Objection – Area E

No.	Who	Contents
1	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
2	Resident -Tivoli Road	Change not supported by the majority, will impose several restrictions and not needed in the area.
3	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area.
4	Resident - Maldon Road	Inadequate consultation process
5	Resident - Maldon Road	Inadequate consultation process and not needed in the area.
6	Resident - Maldon Road	Change not supported by the majority and not needed in the area.
7	Resident - Tivoli Cresc Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
8	Resident - Dyke Road Av	General Objection
9	Resident - Maldon Road	Won't solve the parking problem at night
10	Resident - Tivoli Road	Other solutions needed.
11	Resident - Maldon Road	Scheme not needed
12	Resident - Dyke Road	Change not supported by the majority, will cause displacement and not needed in the area.
13	Resident - Withdean Road	Unhappy at charges for local facilities
14	Resident - Maldon Road	Scheme not needed and will cause displacement
15	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area.

16	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area.
17	Residents - Withdean Road	Change not supported by the majority, Inadequate consultation process and not needed in the area. Also object to double yellow lines on Withdean Road.
18	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area.
19	Resident - Maldon Road	Inadequate consultation process, will impose several restrictions and not needed in the area. Should not pay to park and machines will ruin look of road.
20	Resident - Hazeldene Meads	Object to scheme as Hazeldene Meads is not included. Concerns about displacement.
21	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area. Indirect tax / should not pay to park.
22	Resident - Hazeldene Meads	Inadequate consultation process and concerns about displacement into adjacent roads.
23	Resident - Dyke Road	Change not supported by the majority, a waste of money and not needed in the area.
24	Resident - Maldon Road	Change not supported by the majority and not needed in the area.
25	Resident - Maldon Road	Change not supported by the majority and Inadequate consultation process
26	Business	Change not supported by the majority, Inadequate consultation process and concerns about parking due to the Double yellow lines proposed on both sides of Withdean Avenue.
27	Resident - Withdean Road	Inadequate consultation process and concerns about displacement.
28	Resident - Maldon Road	Not needed / should not pay to park.
29	Resident - Dyke Road	Object to Double yellow lines on road as not required and will reduce parking.
30	Resident - Hove	Change not supported by the majority and not needed in the area. Will affect commuters needed to park and travel by train.
31	Resident - Dyke Road	Double yellow lines will cause displacement further up Dyke Road
32	Resident - Maldon Road	Divisive scheme and citywide parking review required.
33	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process. Double yellow lines in Withdean Avenue will restrict parking to certain areas causing visibility issues.
34	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area.
35	Resident - Tivoli Cres Nth	Unhappy about hours of the scheme and concerns about parking due to the Double yellow lines proposed on both sides of Withdean Avenue. Change not supported by the majority, Inadequate consultation process and not needed in the area
36	Resident - Maldon Road	Unhappy about hours of the scheme / Light touch would be better and will impose several restrictions. Reduction of parking spaces.
37	Resident - Maldon Road	Reduction of parking spaces.
38	Resident - Tivoli Road	Change not supported by the majority, Not needed / should not pay to park.

39	Resident - Tivoli Road	Change not supported by the majority, Not needed / should not pay to park.
40	Resident - Dyke Road	Object to Double yellow lines on road as not required and will reduce parking.
41	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No Evidence)
42	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area. Will impose several restrictions. Object to the double yellow lines in surrounding roads. Will reduce parking
43	Resident - Maldon Road	No need for scheme and will lead to displacement.
44	Resident - Tivoli Cres North	Change not supported by the majority, Inadequate consultation process and not needed in the area.
45	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area. Will impose several restrictions.
46	Resident - Withdean Ave	Change not supported by the majority, Inadequate consultation process and not needed in the area. Will impose several restrictions. Will cause displacement. Object to positioning of double yellow lines on Withdean Avenue.
47	Resident - Hove	Change not supported by the majority and not needed in the area.
48	Resident - Tivoli Road	Change not supported by the majority.
49	Resident - Tivoli Road	Change not supported by the majority.
50	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
51	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
52	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
53	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
54	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
55	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
56	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
57	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
58	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
59	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).

60	Resident - Withdean Ave	Change not supported by the majority, Inadequate consultation process and not needed in the area. Will impose several restrictions. Will cause displacement. Object to positioning of double yellow lines on Withdean Avenue.
61	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
62	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
63	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
64	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
65	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
66	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
67	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
68	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
69	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
70	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
71	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
72	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
73	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
74	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
75	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
76	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
77	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).

78	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
79	Resident - Hazeldene Meads	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
80	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
81	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
82	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
83	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
84	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
85	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
86	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
87	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
88	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
89	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
90	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
91	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
92	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
93	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
94	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
95	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).

96	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
97	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
98	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
99	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
100	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
101	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
102	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
103	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
104	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
105	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
106	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
107	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
108	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
109	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
110	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
111	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
112	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
113	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).

114	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
115	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
116	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
117	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
118	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
119	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
120	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
121	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
122	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
123	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
124	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
125	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
126	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
127	Resident - Withdean Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence). Concerns about displacement.
128	Resident - Withdean Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence). Concerns about displacement.
129	Resident - The Beeches	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
130	Resident - Matlock Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
131	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).

132	Resident - Maldon Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence). Less spaces will be available
133	Resident - Maldon Road	Should be seven days.
134	Resident - Tivoli Road	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
135	Resident - Tivoli Cres Nth	Change not supported by the majority, Inadequate consultation process and not needed in the area (No evidence).
136	Resident - Dyke Road	Will remove perfectly good spaces on Dyke Road
137	Resident - Withdean Road	Object to Double yellow lines on Withdean Road. Concerns traffic will park on east side causing visibility and obstruction issues.
138	Resident - Surrenden Road	General Objection
139	Resident - Hollingdean Ter	General Objection
140	Resident - Osbourne Road	General Objection
141	Resident - Bristol Gate	General Objection

Appendix D - Support / Objections – Road by Road Analysis

Preston Park Station North area

	Support	Objections	Total	(Previous Informal consultation results for reference)		
				Support	Objections	Total
Matlock Road	26	1	27	25	10	35
Maldon Road	5	50	55	23	45	68
Tivoli Road	6	23	29	14	16	30
Tivoli Crescent North	14	23	37	16	12	28
Dyke Road (includes DYL comments)	9	8	17	13	8	21
	60	105	165	91	91	182
				50%	50%	
Outside of original consultation area	2	36	38			
Total	62	141	203			

Appendix E - Support / Objections to TRO – Recent Parking scheme proposals

Scheme	Year	Support	Objections	Comments	Total	<i>Original consultation</i>
Preston Park Station North (E)	2014	62	141	0	203	50% / 50%
London road Station north (J ext)	2013	122	166	8	296	58% in favour
Round Hill area (J ext)	2013	1	11	0	12	56% in favour
Richmond Heights (C ext)	2012	8	11	0	19	61%in favour
Canning Street (C ext)	2012	5	3	0	8	88% in favour
Tivoli Crescent (A ext)	2011	0	8	0	8	93.5% in favour
Viaduct Rise (J ext)	2010	0	62	0	62	69% in favour
RSCH scheme (H ext)	2010	1	6	1	8	52.3% in favour
Preston Park Station (A)	2009	1	29	3	33	49.6% / 49.6%
The Marlet area (O ext)	2009	0	3	1	4	59% in favour
Preston Park Avenue (J ext)	2009	2	1	0	3	70% in favour

Subject:	Wish Ward - Resident Parking Scheme Consultation		
Date of Meeting:	4th March 2013		
Report of:	Executive Director Environment, Development & Housing		
Contact Officer:	Name:	Charles Field	Tel: Ext: 3329
	Email:	Charles.field@brighton-hove.gov.uk	
Ward(s) affected:	Wish		

1. SUMMARY AND POLICY CONTEXT:

- 1.1 The purpose of this report is to address responses to an initial consultation in the Wish Ward. The consultation asked residents, business and services whether they would like to be consulted on a full detailed design for a resident parking scheme. Permission to proceed with the initial consultation was agreed at the Transport Committee meeting on 15th January 2013 as part of the Citywide Parking Review.

2. RECOMMENDATIONS:

- 2.1 That the Committee approves:

(a) That a new proposal for a resident parking scheme be consulted upon in the Wish Park / Aldrington Recreation Ground area under one of the following options;

- i) Consult residents in the agreed streets for a stand alone full scheme (9am-8pm Mon to Sun) or an extension to the Zone W light touch scheme (10am-11am & 7pm-8pm Mon to Sun).

or;

- ii) Consult residents in the agreed streets on an extension to the Zone W light touch scheme (11am-Noon & 7pm-8pm Mon to Sun)

or;

- iii) Consult residents in the agreed streets on a stand alone full scheme (9am-8pm Mon to Sun).

(b) To take forward Bolsover Road as an extension to Area R (Westbourne West) as part of the next stage of consultation and to take forward an option to create parking lay-bys on the west side to maximise parking.

(c) That a further consultation for a resident parking scheme in any other roads within Wish Ward is not taken forward at this stage.

3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

- 3.1 As part of the Citywide Parking Review report presented to the Transport Committee Meeting on 15th January 2013 it was agreed to consult residents in the Wish Ward not currently within a resident parking scheme (excluding Boundary Road) to determine whether they would like to be consulted on a full detailed design for a resident parking scheme.
- 3.2 This was further confirmed in a report to the Transport Committee on 30th April 2013 which approved an initial consultation giving authority to proceed to detailed design consultation on any proposed scheme. The full background regarding the citywide parking review is outlined in this report.
- 3.3 In November 2013 a leaflet, map and questionnaire was sent to all property addresses in the Wish Ward area, excluding residents currently in a resident parking scheme, and excluding all property addresses in Boundary Road (Appendix A).
- 3.4 As outlined in the report to the Committee meeting on 30th April 2013 there were community meetings in the West Hove and South Portslade areas during the city wide parking review in 2012 where several business owners in Boundary Road attended. They said that the current arrangements of one hour free bays and single yellow lines worked well for them and they did not favour any changes.

4. CONSULTATION

- 4.1 The Brighton and Hove City Council Land and Property Gazetteer was used to provide 3027 property addresses in the Wish Ward area of Hove. An information leaflet, detailed map, a questionnaire and a prepaid envelope for reply was sent to each address. Residents were given further information on how similar schemes currently operate as these are the types of schemes that would likely be considered.
- 4.2 1217 responses were received giving a high response rate of 40.2% which included 14 people who did not answer the question. A further 15 responses were not included where no street name was given (4) and where duplicates were sent (11).
- 4.3 Overall, 39.1% of respondents required a residents parking scheme and to see a detailed design while 60.1% of respondents did not want a parking scheme in their area. The full results analysis of the consultation is outlined in Appendix B.
- 4.4 Analysis took place of all the responses received from residents in the Wish Ward area and it was clear that there were two proposals that could be considered to take forward to the next stage of consultation (Appendix C).

Wish Park area

- 4.5 Within an area around Wish Park / Aldrington Recreation Ground there was a section of roads that were 57.8% in favour of a consultation of a detailed design (Appendix D). This included four roads in favour (New Church Road between Wish Road and Saxon Road, Glendor Road, Marine Avenue and Saxon Road), three roads slightly against a resident parking scheme (Kingsway between Wish Road and Saxon Road, Norman Road and Tandridge Road) and one road that was 50/50 (Tennis Road). This section would also

include Wharf Road entered from the Kingsway where there are no immediate properties (Appendix E).

4.6 The initial letter sent out to residents outlined that we would not be proposing any further light touch schemes due to the conclusions of the Citywide Parking Review presented to the Transport Committee on 15th January 2013.

4.7 However, this was on the basis that a large area of the Wish Ward was being consulted and a new scheme would have to be a full scheme between 9am-8pm. However, due to the following reasons it is proposed that an extension to the Area W resident parking scheme could also be considered;

- The conclusion of the Citywide Parking Review stated that there should be no further light touch schemes. However, this would be a small extension to an existing light touch scheme.
- Although it was stated a full scheme only (9am-8pm) would be considered in the leaflet that was on the basis of the whole larger area being consulted. The result shows a small possible area to take forward in Wish Park adjacent to an existing light touch scheme.
- There could be pay & display bays (up to four hours in this case) in Saxon Road for users to the park. This would solve any issues for park users and indeed visitors for other services not being able to park in the restricted hours. It is also proposed to consider pay & display bays (up to four hours) in Wish Road adjacent to the park although this would be considered separately as part of the next available amendment Traffic Order for changes within resident parking schemes. This would review the current utilisation of parking spaces in Wish Road.

Extension to the Area W Light touch scheme ((10am-11am & 7pm-8pm Mon to Sun).

4.8 In terms of a Light Touch scheme in this area these are the pros and cons;

Pros

- Residents may prefer an extension to the Light touch scheme rather than a full scheme.
- Slightly reduced Resident Permit costs
- The feedback from the majority of residents in current light touch schemes is that they are happy with them.
- Free to park for the majority of the day.
- Less intrusive signage.

Cons

- There may be revenue implications of not having shared pay & display spaces and reduced resident permit costs.
- There may be issues for visitors to residents by not including shared pay & display spaces
- There may be issues with people parking to use the seafront and other facilities after 11am until 7pm particularly in the summer periods.

- This may increase vehicle displacement to adjacent roads as there will only be an opportunity for visitors to park near the park and not on any other roads included within a light touch parking scheme.

A new stand alone full scheme (9am-8pm Mon to Sun)

4.9 In terms of a new stand alone full scheme in this area these are the pros and cons;

Pros

- Residents were originally consulted on this sole option and agreed to be consulted on these proposals.
- The restrictions are more flexible to allow visitors to park in the area and for longer periods.
- Restrictive parking throughout the day from 9am to 8pm may help residents and visitors to park.
- The resident permit is valid during the whole period from 9am-8pm.
- Although displacement may occur it is likely to be reduced slightly by introducing shared pay & display for longer periods.

Cons

- A new stand alone full scheme proposal (9am-8pm) would mean the existing light touch scheme (Area W – Westbourne West) would be sandwiched within two full schemes.
- More / larger signage required compared to light touch schemes
- Resident permit costs are slightly higher.
- Residents may prefer more resident permit parking rather than some shared pay & display parking.

4.10 Residents, businesses and services in this proposed area would have the opportunity to vote for or against a resident parking scheme based on the consultation proposal agreed in the recommendations as part of the next stage of consultation on the full detailed design.

4.11 If a light touch scheme is taken forward then this would be the last extension to the Area W light touch resident parking scheme. This is because if the scheme became any larger than the current scheme and the possible extension area this could cause internal commuting e.g. residents using their permits / visitor permits to use in other roads. The conclusion of the Citywide Parking Review reported to Transport Committee on 15th January 2013 stated that there should be no further light touch schemes although this would be a small extension to an existing scheme.

Bolsover Road

4.12 Respondents from Bolsover Road were strongly in favour of a consultation on a full detailed design (89.1%) so it proposed that they are consulted on an extension to the Area R (Westbourne) resident parking scheme (Mon to Sun, 9am-8pm) as they are immediately adjacent to this zone (Appendix E)

4.13 Officers have met with representatives of the local resident association and it was made clear that residents want to be consulted on a detailed design as long as it created parking on both sides of the road. During previous consultations when parking was proposed on

one side only there was strong opposition to the proposals as this would severely restrict the parking available to residents. It was made clear at the time that the Council could not condone pavement parking and this could not be considered as part of any proposals. Therefore, it was recommended not to proceed with any resident parking scheme in this road.

- 4.14 As Bolsover Road is a very unique road with wide pavements a number of investigations have been undertaken for various options to maximise parking. The only option that was viable both practically and financially was to cut a number of parking spaces 1.1 metres into the west side of the pavement where the existing street furniture allows and make the road one way northwards. It was calculated this may create up to 44 parking spaces on this side of the road in addition to the 46 spaces on the other side (total of 90 spaces).
- 4.15 The estimated cost of this work would be just over £30,000. Residents are unlikely to want a resident parking scheme unless additional parking is provided so in effect the above fee would be paid under capital expenditure through the parking scheme costs. This would be on the basis that the Council would get an annual fee from approx up to 90 permits (current cost is £120 each) of £10,800. So in effect this carriageway work would pay itself back in three years. Due to the costs involved and the unpredictability of resident permit take up the Council would also need to consider a section of shared pay & display / resident permit spaces on the west side of the road.
- 4.16 This proposal would not set a pavement parking precedent as the Council would widen the carriageway to create lay-bys between the street furniture. It also would not set a precedent for other parking schemes because there are very few streets in the city where the pavements are wide enough to be able to do this and where the road layout makes this an appropriate option. The current pavement on the west side is three metres wide and would be reduced to 1.9 metres under the proposal which would still leave a significant amount of width for the remaining pavement.
- 4.17 However, although initial checks have been made and it looks unlikely that services will be found when moving the carriageway, if the costs increase due to issues such as underground cables / drainage issues then this proposal would have to be reviewed.

Other Roads

- 4.18 The respondents of the vast majority of the other roads consulted were either 50/50 or against any resident parking scheme in their road. The exception to this was the following five roads;
- Worcester Villas (79.5% - 35 votes to 9)
 - Chelston Avenue (53.5% - 8 votes to 7)
 - Portland Villas (65% - 26 votes to 14)
 - Mornington Crescent (66.7% - 2 votes to 1)
 - Portland Lane (100% - 1 vote to 0)
- 4.19 However, there is no viable scheme or geographical boundary that would allow these roads to be consulted as an area for a resident parking scheme. Therefore, it is proposed not to take forward a further consultation in any of the other roads within Wish Ward.
- 4.20 As concerns have been outlined about dangerous and obstructive parking the Council are recommending proposing double yellow lines in Chelston Avenue (junction with Portland

Road) and Olive Road (East side) as part of the scheme costs to counter any possible increased vehicle displacement. This would be part of the traffic order advertised for the schemes only if any scheme is taken forward.

- 4.21 Officers have met with both the Wish Ward Councillors who have voiced their support for all these ways forward.

Conclusions

- 4.22 It has been recommended to take into account the responses received and a consultation on a detailed design take place in the Wish Park / Aldrington Recreation Ground area based on the consultation proposal agreed in the recommendations.
- 4.23 Also recommended is to take forward Bolsover Road as an extension to Area R (Westbourne West) as part of further consultation and to take forward an option to create parking lay-bys on the west side of parking to maximise parking.
- 4.24 It is also been recommended at a later date to advertise double yellow lines on the East side of the road in Olive Road and on the junction of Portland Road / Chelston Avenue if any schemes are taken forward. This will be included in the recommendations for any further committee report if appropriate.
- 4.25 Therefore, it is recommended not to take forward a further consultation for a resident parking scheme in any of the other roads within Wish Ward at this stage.
- 4.26 All residents in the Wish Ward who have been consulted will be sent a newsletter following any Committee decision to inform them of the way forward.

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 5.1 Capital: New parking schemes are capital projects which are funded by unsupported borrowings, and repaid from revenue over 7 years, using the income generated.

Revenue: income generated from on-street parking schemes is first defrayed against relevant expenditure with any surplus used for transport and highways related projects and expenditure such as supported bus services, concessionary fares and Local Transport Plan projects.

Finance Officer Consulted: Jeff Coates

Date: 04/02/2014

Legal Implications:

- 5.2 The Council's powers and duties under the Road Traffic Regulation Act 1984 ("the Act") must be exercised to secure the expeditious, convenient and safe movement of all types of traffic including cyclists and pedestrians. As far as is practicable, the Council should have regard to any implications in relation to:- access to premises; the effect on amenities; the Council's air quality strategy; facilitating the passage of public

services vehicles; securing the safety and convenience of users; any other matters that appear relevant to the Council.

- 5.3 The Council has to follow the rules on consultation set out by the government and the courts. The Council must ensure that the consultation process is carried out at a time when proposals are still at their formative stage, that sufficient reasons and adequate time must be given to allow intelligent consideration and responses and that results are properly taken into account in finalising the proposals.
- 5.4 After the proposals are advertised, the Council can, in the light of objections / representations received, decide to re-consult either widely or specifically when it believes that it would be appropriate before deciding the final composition of any associated orders. Where there are unresolved objections to the traffic orders, then the matter is required to return to Environment, Transport & Sustainability Committee for a decision.
- 5.5 Under the Act the Council may acquire, whether by purchase or by hiring, such parking meters and other apparatus as appear to it to be required or likely to be required for the purposes of its functions in relation to designated parking places.

Lawyer Consulted : Hilary Woodward

Date:10 February 2014

Equalities Implications:

- 5.6 The proposed measures will be of benefit to many road users.

Sustainability Implications:

- 5.7 Any new motorcycle bays and any on-street pedal cycle bays will encourage more sustainable methods of transport.
- 5.8 Managing parking will increase turnover and parking opportunities for all.

Crime & Disorder Implications:

- 5.9 The proposed restrictions will not have any implication on the prevention of crime and disorder.

Risk and Opportunity Management Implications:

- 5.10 Any risks will be monitored as part of the overall project management, but none have been identified.

Public Health Implications:

- 5.11 There are no direct public health implications in this report.

Corporate / Citywide Implications:

- 5.12 Any legal disabled bays will provide parking for the holders of blue badges wanting to use the local facilities.

6. EVALUATION OF ANY ALTERNATIVE OPTION(S):

- 6.1 The alternative options are going ahead with a full scheme in the Wish Park area or doing nothing at all which would mean the proposals would not be taken forward. However, it is the recommendation of officers that proposals put forward are proceeded with for the reasons outlined within the report.

7. REASONS FOR REPORT RECOMMENDATIONS

- 7.1 To seek approval to proceed to the next stage of consultation after taking into consideration the consultation report. These proposals are recommended to be taken forward for the reasons outlined within the report.

SUPPORTING DOCUMENTATION

Appendices:

1. Appendix A – Map of area consulted.
2. Appendix B – The consultation report
3. Appendix C – Plan showing roads in favour / against
4. Appendix D – Analysis / results of Wish park area.
5. Appendix E – Map of proposal areas to take forward

Documents In Members' Rooms


None

Background Documents

1. Item 43 - Environment Cabinet Member Meeting Report – 9th November 2011
2. Item 49 – Transport Committee Meeting Report – 15th January 2013
3. Item 80 – Transport Committee Meeting Report – 30th April 2013



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<p>scheme name</p> <p>Parking Consultation</p>	<p>drawing title</p> <p>Consultation Area Boundary</p>		<p>APPENDIX A</p>
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Wish Ward Residents Parking Scheme Consultation Report December 2013

Background

As part of the Citywide Parking Review in 2012, the council received comments and complaints from members of the public about parking problems in Wish Ward. It was therefore decided to write to residents to ask them to consider if they would like to be consulted on a detailed design resident parking scheme for their area.

Headline Findings

The consultation achieved a 40.2% response rate.

39.9% of respondents were in favour of a Residents Parking Scheme and 60.1% of respondents were against the introduction of a scheme. There were 1203 responses to this question.

Methodology

Brighton and Hove City Council Land and Property Gazeteer was used to provide 3027 property addresses in The Wish Ward area of Hove. An information leaflet, detailed maps, a questionnaire and a prepaid envelope for reply was sent to each address. Residents were given further information on how similar schemes currently operate as these are the types of schemes that will be considered

1217 responses¹ were received giving a response rate of 40.2%.

Results

Q1 Would you like a parking scheme in your area?

	Number	%
Yes- I would like a residents parking scheme, and to see a detailed design to consider	480	39.9
No – I do not want a parking scheme in my area	723	60.1
Total	1203²	100

Results on a street by street basis were as follows:

¹ The following responses were not included in this figure: 4 where no street name was given and 11 duplicates (only one response was included from each household).

² 14 people did not answer this question.

Street	No. properties mailed	No. responses returned	Response rate %	Yes		No	
				No.	%	No.	%
Aldrington Close	39	14	35.9	0	0.0	14	100.0
Bolsover Road	79	46	58.2	41	89.1	5	10.9
Boundary Road	8	0	0.0	0	0.0	0	0.0
Brittany Road	59	28	47.5	6	23.1	20	76.9
Chelston Avenue	27	15	55.5	8	53.3	7	46.7
Derek Avenue	55	25	45.4	8	32.0	17	68.0
Erroll Road	96	45	46.9	4	8.9	41	91.1
Glastonbury Road	13	9	69.2	2	22.2	7	77.8
Glebe Villas	72	32	44.4	12	37.5	20	62.5
Glendor Road	29	15	51.7	13	86.7	2	13.3
Harbour Mews	3	0	0.0	0	0.0	0	0.0
Ingram Crescent East	253	69	27.3	27	40.3	40	59.7
Ingram Crescent West	240	44	18.3	9	20.9	34	79.1
Jesmond Close	3	2	66.7	0	0.0	2	100.0
Jesmond Road	54	28	51.8	10	35.7	18	64.3
Kenton Road	12	5	41.7	2	40.0	3	60.0
Kingsway	224	68	30.4	22	33.3	44	66.7
Leicester Villas	67	33	49.2	12	36.4	21	63.6
Mansfield Road	57	32	56.1	13	41.9	18	58.1
Marine Avenue	58	33	56.9	23	71.9	9	28.1
Middleton Avenue	47	23	48.9	8	34.8	15	65.2
Mornington Crescent	8	3	37.5	2	66.7	1	33.3
New Church Road	257	84	32.7	31	36.9	53	63.1
Norman Road	42	17	40.5	7	41.2	10	58.8
Olive Road	6	4	66.7	0	0.0	4	100.0
Portland Avenue	61	29	47.5	13	44.8	16	55.2
Portland Lane	3	1	33.3	1	100.0	0	0
Portland Road	258	65	25.6	22	33.8	43	66.2
Portland Villas	75	40	53.3	26	65.0	14	35.0
Roman Road	67	34	50.7	13	38.2	21	61.8
Rothbury Road	48	30	62.5	8	26.6	22	73.3
Saxon Road	38	21	55.2	15	75.0	5	25.0
Seaford Road	27	12	44.4	3	25.0	9	75.0
St Keyna Avenue	55	32	58.2	5	15.6	27	84.4
St Leonards Avenue	166	56	33.7	12	22.6	41	77.4
St Leonards Gardens	87	53	60.9	9	17.0	44	83.0
St Leonards Road	134	67	50.0	30	44.8	37	55.2
Tandridge Road	19	10	52.6	4	40.0	6	60.0
Tennis Road	31	16	51.6	8	50.0	8	50.0
Woodhouse Close	4	2	50.0	1	50.0	1	50.0
Woodhouse Road	52	31	59.6	15	50.0	15	50.0
Worcester Villas	94	44	46.8	35	79.5	9	20.5
Total	3027	1217	-	480	39.9	723	60.1

Although most respondents said they don't want a parking scheme in their road, some roads are heavily in favour of a residents parking scheme. These are mainly roads towards the eastern edge of the Wish Area which suffer from displacement parking from Areas R and W and also roads to the south of Wish Park which have added pressures of people wanting free parking to use the beach.

Demographic Information

Gender

Gender	Number	%
Male	398	45.7
Female	469	53.8
Other	4	0.5
Total	871	100

Do you identify as the gender you were assigned at birth?	Number	%
Yes	748	99.2
No	6	0.8
Total	754	100

Age

Age	Number	%
18-24	4	0.5
25-34	70	9.1
35-44	161	20.8
45-54	194	25.1
55-64	126	16.3
65-74	103	13.3
75+	115	14.9
Total	773	100

Ethnicity

Ethnicity		Number	%
White	White English/ Welsh/ Scottish/ Northern Irish/ British	772	89.6
	White Irish	15	1.7
	Any other white background	35	4.1
Asian or Asian British	Bangladeshi	2	0.2
	Indian	6	0.7
	Chinese	4	0.5
	Any other Asian background	3	0.3
Black or Black British	African	4	0.5
	Caribbean	2	0.2
	Any other Black background	1	0.1
Mixed	Asian and White	3	0.3
	Black African and White	1	0.1
	Black Caribbean and White	2	0.2
	Any other mixed background	3	0.3
Any other ethnic group	Arab	9	1.0
Total		862	100

Disability

Disability	Number	%
Yes a little	82	9.6
Yes a lot	99	11.6
No	672	78.8
Total	853	100

Of those who answered “yes”, disabilities were as follows:

Please state the type of impairment which applies to you.	Number	% ³
Physical impairment	114	63.0
Sensory impairment	64	35.4
Learning disability/ difficulty	12	6.6
Long-standing illness	4	2.2
Mental health condition	22	12.1
Development condition	1	0.5
Other	17	9.4
Total	234	-

³of those who answered yes to the disability question above. Respondents could tick more than one option; therefore percentages won't add up to 100%.



KEY



In favour
of a scheme



Against
a scheme



Even split
for and against

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scheme name

Parking Consultation

drawing title

Consultations results by road

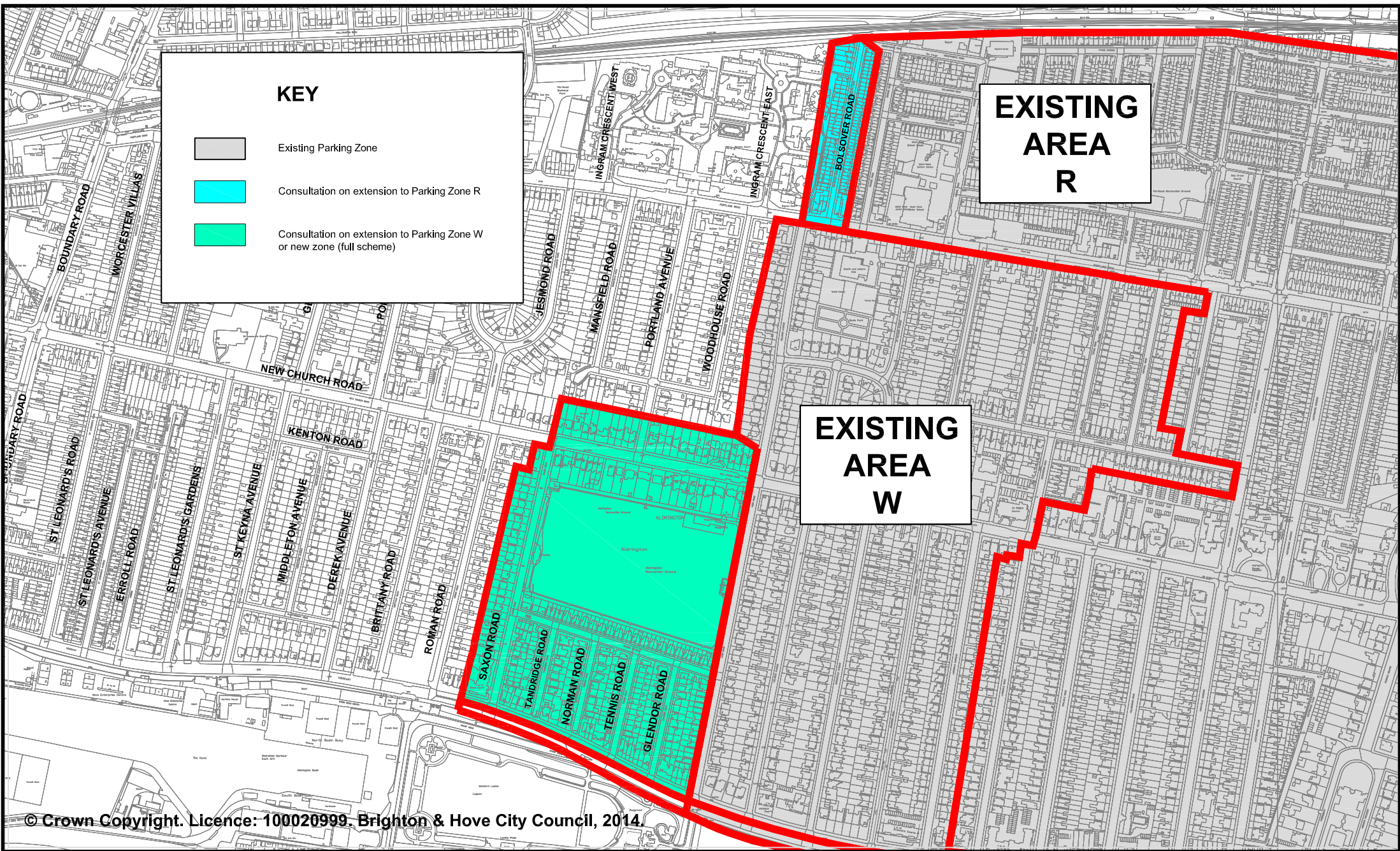


APPENDIX C

APPENDIX D

Street	Yes		No	
	No.	%	No.	%
Glendor Road	13	86.7	2	13.3
Kingsway (part)	13	37.1	22	62.9
New Church Road (part)	17	60.7	11	39.3
Norman Road	7	41.2	10	58.8
Marine Avenue	23	71.9	9	28.1
Saxon Road	15	75	5	25
Tandridge Road	4	40	6	60
Tennis Road	8	50	8	50
Total	100	57.80%	73	42.20%

2 omitted as duplicates.



Subject:	Proposed amendments to verge & footway parking restrictions		
Date of Meeting:	4 March 2014		
Report of:	Executive Director Environment, Development & Housing		
Contact Officer:	Name:	Owen McElroy	Tel: 293693
	Email:	Owen.mcelroy@brighton-hove.gov.uk	
Ward(s) affected:	Patcham & North Portslade		

FOR GENERAL RELEASE.**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 To consider representations, comments, support and objections received to amendment Traffic Regulation Orders
- 1.2 The amendments were requested by residents and ward members following the implementation of verge and footway parking restrictions in parts of the Surrenden area of Brighton and Mile Oak in North Portslade.

2. RECOMMENDATIONS:

- 2.1 That having taken into account the duly made representations and objections the Committee is recommended to approve the Brighton & Hove (Various Roads) (Prohibition Of Stopping and Waiting On Verges And Footways) Order 2013 Amendment Order No.* 201* and the Brighton & Hove (Waiting & Loading/Unloading Restrictions and Parking Places) Consolidation Order 2008 Amendment Order No.* 201* drafts of which are attached at Appendices C & D ("the Amendment Orders").

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Brighton & Hove (Various Roads) (Prohibition of Stopping and Waiting On Verges And Footways) Order 2013 ("the TRO") prohibiting verge and footway parking was approved by Environment, Transport and Sustainability Committee on 8 October 2013 and became operational in early December.
- 3.2 Residents in Old Court Close, Patcham requested that the Close become part of the verge and footway restriction scheme to prevent damage to and obstruction of verges and footways and to reduce the environmental impact of large signs at the entry to the street.

- 3.3 An independent road safety audit highlighted the issue of unrestricted parking at the eastern end of Chalky Road, Mile Oak. Should vehicles displace from the verges onto this area then traffic flow could be impeded leading to collisions.
- 3.4 The amendments contained in the Amendment TROs are to include Old Court Close, Brighton in the list of streets subject to verge and footway parking prohibition and to extend the yellow lines in Chalky Road, Portslade on the south side opposite Broomfield Drive.

4. COMMUNITY ENGAGEMENT & CONSULTATION

- 4.1 The Amendment Orders were advertised between the 24th January and the 14th February 2014. Any objections or other representations received after the publication of this report will be reported verbally at Committee.
- 4.2 The Ward Councillors for the areas were consulted, as were the statutory consultees such as the Emergency Services.
- 4.3 Notices were also put on street on the 23rd January and were rechecked on 4th February and were still in place. The notice was also published in the Argus newspaper on the 24th January 2014. Detailed plans and the order were available to view at Hove Library, Jubilee Library, the Customer Service Centres at Bartholomew House and at Hove Town Hall
- 4.4 The documents were also available to view and to respond to directly on the Council website.

Summary of Objections and officers response – see appendix G

Old Court Close

- 4.5 At the time of writing the report one objection had been received to the proposals in Old Court Close on the grounds that the required signage within the street could be intrusive. Officer response – round repeater signs will be required on lamp columns but a large entry/exit sign can be removed at the junction with Braybon Avenue. Overall the street environment will be improved.
- 4.6 At the time of writing the report seven representations in support had been received from residents in the street and the local area expressing general support for the proposals. This included a representation from a local campaign group “Campaign to save our verges”.

Chalky Road, Mile oak

- 4.7 At the time of writing the report one objection had been received from a local business as part of a general objection to a number of proposed traffic orders in the city. This refers to the “fanatical proposals that have been introduced recently... crippling the city” and affecting that business. Officer response –The measures are reasonable and proportionate at this location to ensure the safety of road users close to a traffic calming feature and have been supported by an independent safety audit.

5. CONCLUSION

- 5.1 Old Court Close, Patcham. Site surveys showed that there was evidence of parking and driving on the verges in the Close. The inclusion of the street will also enable the removal of one large post and sign and its replacement with less intrusive repeater signs on lamp columns.
- 5.2 Chalky Road, Mile Oak - Following implementation of the TRO the site was monitored and there is significant narrowing of the carriageway on the westbound approach to the first traffic calming feature (chicane). It is therefore proposed to extend the existing yellow lines on the south side of Chalky Road eastwards to the point where the available road width increases at the junction with Broomfield Drive.

6. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 6.1 February 2013 Budget Council approved a £125,000 one off revenue contribution in 2013-14 to support the verge and footways parking restriction pilot schemes.

Finance Officer Consulted: Steven Bedford

Date: 10/02/14

Legal Implications:

- 6.2 The Council regulates traffic by means of orders made under the Road Traffic Regulation Act 1984 ("the Act"). Procedural requirements are contained in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and require public notice of orders to be given. Any person may object to the making of an order. Any unresolved objections to an order must be considered by the Environment, Transport & Sustainability Committee before it can be made.

Lawyer Consulted:

Name Hilary Woodward

Date: 19/2/14

Equalities Implications:

- 6.3 None

Sustainability Implications:

- 6.4 The proposals will help preserve the amenity of the verges and their value as surface drainage

Any Other Significant Implications:

- 6.5 None

7 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 7.1 The alternative is not to proceed with the amendment traffic orders but this is not recommended for the reasons given in the report.

SUPPORTING DOCUMENTATION

Appendices:

1. Appendix A TRO Notices (combined)
2. Appendix B Statement of reasons (combined)
3. Appendix C Draft amendment order Old Court Close
4. Appendix D Draft amendment order Chalky Road
5. Appendix E Plan of Old Court Close proposals
6. Appendix F Plan of Chalky Road proposals
7. Appendix G Summary of representations

Documents in Members' Room

None

Background Documents

1. Report to Environment, Sustainability & Transport Committee 8 October 2013, Agenda item 30

**Appendix A traffic order notice
BRIGHTON & HOVE CITY COUNCIL
ROAD TRAFFIC REGULATION ACT 1984**

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

Brighton & Hove (Various Roads) (Prohibition Of Stopping and Waiting On Verges And Footways) Order 2013 Amendment Order No.* 201* (Ref:TRO- ? -2014)

Prohibition of Parking on Verge and Footway – New in:- Old Court Close

Brighton & Hove (Waiting & Loading/Unloading Restrictions and Parking Places) Consolidation Order 2008 Amendment Order No.* 201* (Ref:TRO-?-2014)

No Waiting At Any Time (Double Yellow Lines) – Amendment in:- Chalky Road

A copy of this Notice, the proposed Orders, plans showing the lengths of road affected and a statement of the Council's reasons for proposing to make the Orders, may be seen online at www.brighton-hove.gov.uk/tro-proposals. These documents together with a copy of the existing Orders to be amended may also be examined at the Customer Service Centres at Bartholomew House, Bartholomew Square, Brighton (Monday to Friday 8.45am-4.30pm) and Hove Town Hall, Ground Floor, Norton Road, Hove, (Monday to Friday 8.45am-5.00pm).

All objections and other representations relating to any or all of the proposed Orders must be made in writing and all objections must specify the grounds on which they are made and should be sent to the Executive Director Environment, Development & Housing, Brighton & Hove City Council, Hove Town Hall (room 323), Norton Road, Hove, BN3 3BQ (quoting the reference TRO -12-2013) or by e-mail to parking.consultation@brighton-hove.gov.uk or online (see details above) no later than DAY MONTH 2014

Dated: DAY MONTH 2014

Executive Director Environment, Development & Housing
Brighton & Hove City Council
c/o Parking Infrastructure
Hove Town Hall
Norton Road
HOVE BN3 3BQ

**Appendix B Statement of reasons
BRIGHTON & HOVE CITY COUNCIL
ROAD TRAFFIC REGULATION ACT 1984**

**Brighton & Hove (Various Roads) (Prohibition Of Stopping and Waiting
On Verges And Footways) Order 2013 Amendment Order No.* 201***

**Brighton & Hove (Waiting & Loading/Unloading Restrictions and Parking
Places) Consolidation Order 2008 Amendment Order No.* 201***

Statement of Reasons

It is proposed to extend the at any time waiting restrictions (double yellow lines) on Chalky Road, Portslade, south side and to introduce waiting and stopping on verges and footways in Old Court Close Patcham for the following reasons:

Chalky Road, Portslade

To avoid danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising - by preventing obstructive parking at any time close to a traffic calming feature, (a chicane) located near a road junction, sports facility and school.

To facilitate the passage on the road or any other road of any class of traffic (including pedestrians) – by preventing obstruction of the carriageway close to a traffic calming feature (chicane) at any time and obstruction to the movement of buses during the day and evenings including weekends.

Old Court Close Patcham

To avoid danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising - by preventing rutting and consequent soil erosion caused by vehicles driving over and parking on verges leading to mud and debris on the adjoining footways and carriageway.

To facilitate the passage on the road or any other road of any class of traffic (including pedestrians) – by preventing obstruction of the footway or verge by parked vehicles

To prevent damage to the road - by preventing erosion of adjacent verges or damage to the footway leading to undermining or any other damage to the carriageway

To preserve or improve the amenities of the area through which the road runs - by preserving the amenity value of highway verges including their value as surface water drainage and for biodiversity. Also to prevent damage to trees and shrubs planted in the verge or footway. Also to reduce the impact of larger entry/exit signs in the area.

Dated: DAY MONTH YEAR
Executive Director Environment, Development & Housing

Brighton & Hove City Council
c/o Parking Infrastructure
Hove Town Hall
Norton Road
HOVE BN3 3BQ

Appendix C
BRIGHTON & HOVE CITY COUNCIL
ROAD TRAFFIC REGULATION ACT 1984

**Brighton & Hove (Various Roads) (Prohibition Of Stopping and Waiting
On Verges And Footways) Order 2013 Amendment Order No.* 201***

Brighton & Hove City Council in exercise of its powers under Sections 1, 2, 3 and 4 of the Road Traffic Regulation Act 1984 ("the 1984 Act") as amended and Part 6 of the Traffic Management Act 2004 and of all other enabling powers after consultation with the Chief Officer of Police in accordance with Part III of Schedule 9 to the 1984 Act hereby makes the following Order.

1. This Order shall come into operation on the day of
2013 and may be cited as the "Brighton & Hove (Various Roads)
(Prohibition of Stopping and Waiting On Verges and Footways)
Order 2013 Amendment Order No.** 201*.
2. The Brighton & Hove (Various Roads) (Prohibition of Stopping and
Waiting on Verges and Footways) Order 2013 is amended as follows:

SCHEDULE 1 AMENDMENTS:

Prohibition of Parking on Verge and Footway

Add new item 5a: Old Court Close, Patcham

**MADE UNDER THE COMMON SEAL OF
BRIGHTON & HOVE CITY COUNCIL**

this day of 20

**THE COMMON SEAL OF BRIGHTON & HOVE CITY
COUNCIL** was affixed to this Order in the presence of

.....
Authorised Officer

Appendix D
BRIGHTON & HOVE CITY COUNCIL
ROAD TRAFFIC REGULATION ACT 1984

Brighton & Hove Outer Areas (Waiting, Loading and Parking) and Cycle Lanes Consolidation Order 2013 Amendment No.* 201*

Brighton & Hove City Council ("the Council") in exercise of its powers under Sections 1, 2, 3, 4, 19, 32, 35, 35A, 43, 44, 45, 46, 46A, 47, 49, 51, 53, 55, 61, 63, 63A, 66, 117 and 124 (1) (c) & (d) of the Road Traffic Regulation Act 1984 ("the 1984 Act") as amended and Part 6 of the Traffic Management Act 2004 and of all other enabling powers after consultation with the Chief Officer of Police in accordance with Part III of Schedule 9 to the 1984 Act hereby makes the following Order.

1. This Order may be cited as Brighton & Hove Outer Areas (Waiting, Loading and Parking) and Cycle Lanes Consolidation Order 2013 Amendment Order No. ** 201* and shall come into operation on the XX day of MONTH 2013.
2. Brighton & Hove Outer Areas (Waiting, Loading and Parking) and Cycle Lanes Consolidation Order 2013 is amended as follows:

SCHEDULE 1 AMENDMENTS:

Part 1.1 No Waiting At Any Time

Delete whole description for item 386 Chalky Road: delete and substitute with the following:

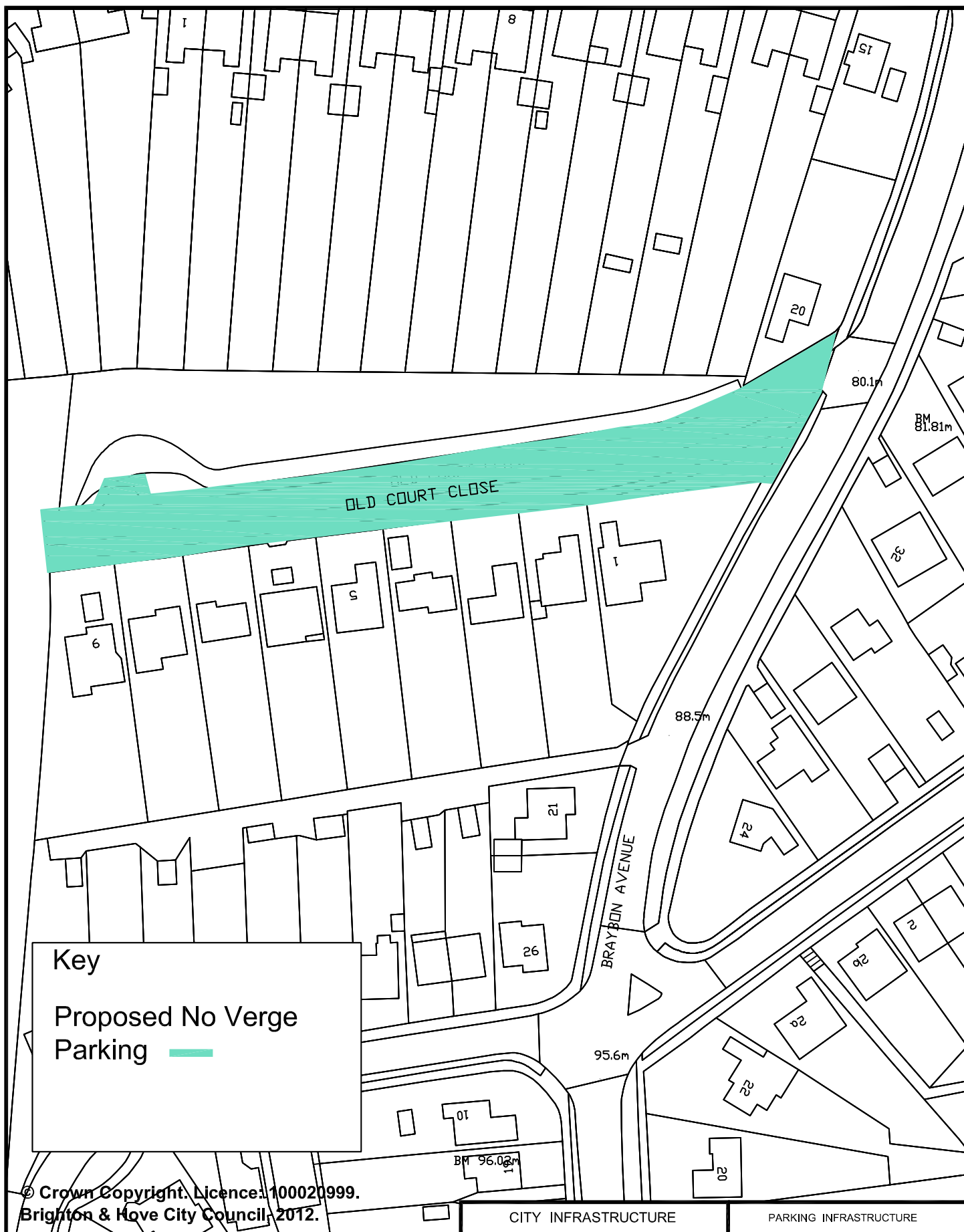
"South side - From a point 5m west of the prolongation of the western kerbline of Broomfield Drive westwards for a distance of 152m"

**MADE UNDER THE COMMON SEAL OF
BRIGHTON & HOVE CITY COUNCIL**


this day of 20

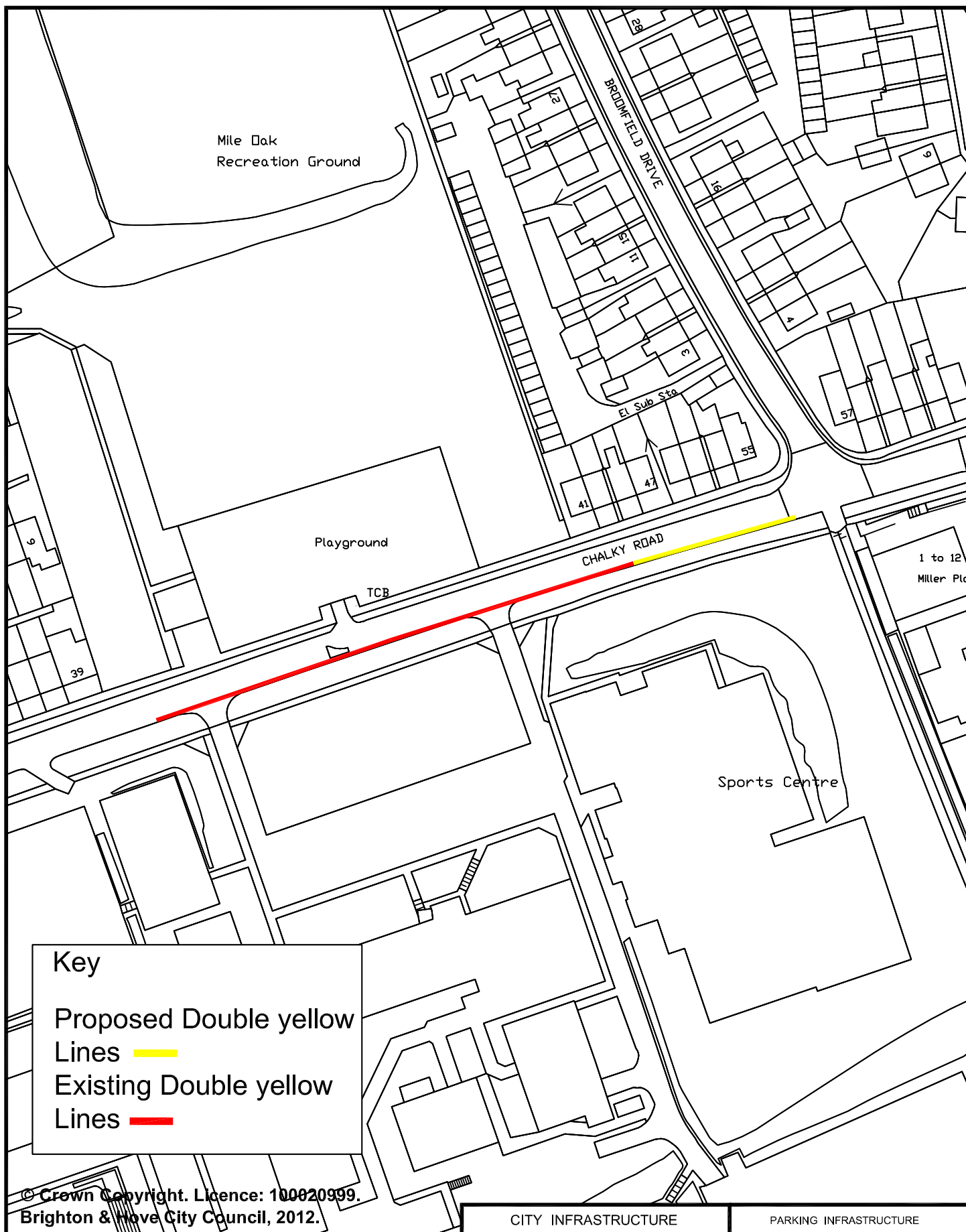
**THE COMMON SEAL OF BRIGHTON & HOVE CITY
COUNCIL** was affixed to this Order in the presence of


.....
Authorised Officer



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Brighton & Hove City Council 2012.

CITY INFRASTRUCTURE		PARKING INFRASTRUCTURE
Address: Old Court Close, Patcham, Brighton	Scale : N.T.S.	 Brighton & Hove
	Date : Jan 2014	
Reason: To Prevent vehicles parking on grass verges	Drawn : D.A.	
	Drawing Number : B&H_VERGE_001	



Brighton & Hove City Council, 2012.		CITY INFRASTRUCTURE	PARKING INFRASTRUCTURE
Address: Chalky Road, Portslade	Scale : N.T.S.	 Brighton & Hove	
	Date : Jan 2014		
Reason: To Prevent obstruction to all road users	Drawn : D.A.		
	Drawing Number : B&H_Dyls_001		

Appendix F

Proposed amendments to verge and footway parking restrictions - summary of representations			
		Old Court Close - addition to verge and footway parking prohibition	
Who	Object/Supports/Comments	Summary	Officer comments
(1) Local resident	Objects	New signing will be intrusive	Signing is required to enforce the restriction but will be kept to a minimum
(2) Local resident	supports	Generally supports statement of reasons	No comment
(3) Local resident	supports	Generally supports statement of reasons	No comment
(4) Local resident	supports	Generally supports statement of reasons	No comment
(5) Local resident	supports	Generally supports statement of reasons	No comment
(6) Local resident	supports	Generally supports statement of reasons	No comment
(7) Local resident	supports	Generally supports statement of reasons	No comment
(8) Campaign to save our grass verges	supports	This is a community campaign group that supports the inclusion of this road and generally supports the statement of reasons	No comment
		Chalky Road, Mile oak proposed extension to double yellow lines on south side	
Who	Object/Supports/Comments	Summary	Officer comments
Local business	Objects	This is a part of a general objection to a number of proposed traffic orders in the city. It refers to the "fanatical proposals that have been introduced recently... crippling the city" and affecting that business.	The measures are reasonable and proportionate at this location to ensure the safety of road users close to a traffic calming feature and have been supported by an independent safety audit.

Subject:		Preston Park Triangle proposed residents parking scheme	
Date of Meeting:		4 March 2014	
Report of:		Executive Director of Environment, Development & Housing	
Contact Officer:	Name:	Owen Mcelroy	Tel: 293693
	Email:	owen.mcelroy@brighton-hove.gov.uk	
Ward(s) affected:		Preston Park & Withdean	

FOR GENERAL RELEASE.**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 The purpose of this report is to consider the outcome of the recent public consultation for a proposed residents parking scheme in the triangle of roads between Preston Drove and Stanford Avenue. Permission to proceed with the consultation was agreed at Transport Committee on 15th January 2013.

2. RECOMMENDATIONS:

- 2.1 That the Committee authorises the Executive Director Environment Development & Housing to progress, with the exception of Preston Drove, an extension to the Area J London Road station (north) residents parking scheme as set out in this report to the final design stage.
- 2.2 That the Executive Director Environment, Development & Housing be authorised to publish statutory notices of the necessary traffic orders to implement the proposed scheme to allow formal representations to be made.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 During the city wide parking review consultation residents requested consultation on parking control, supported by ward members.
- 3.2 For many years the area has experienced parking pressure due to the presence of local attractors such as Preston Park and London Road railway stations and Preston Park recreation ground. There is also the relative proximity to the city centre and additional displacement from the adjoining London Road Area J extension implemented in July 13.
- 3.3 In November 2013 a leaflet and questionnaire giving details about proposals for a residents parking scheme was sent to all property addresses in the area between Preston Drove (inclusive), Preston Park Avenue & Stanford Avenue.

- 3.4 As originally proposed the extension to the scheme would have included Preston Drove. For the reasons set out below this road is not now within the proposed extension.

4. COMMUNITY ENGAGEMENT & CONSULTATION

Postal questionnaires and on line consultation

- 4.1 The Brighton & Hove City Council land & Property gazetteer was used to provide 1287 property addresses in the Preston park Triangle area. An information leaflet (Appendix A), a detailed plan (Appendix B), a questionnaire (Appendix C) and a prepaid envelope for reply was sent to each address. Respondents were also invited to complete the survey on line via the council's consultation portal: 127 respondents (21%) chose this method.
- 4.2 Plans could also be viewed at an exhibition at Hove Town hall parking shop from Monday 11 November to Friday 20 December, 9am to 5pm
- 4.3 Information about the consultation, including the link to the web portal was also publicised in the local trade and community publication "Fiveways Directory" which is distributed to all addresses in the area plus the Fiveways triangle of roads between Balfour Road and Ditchling Road.
- 4.4 A link to the consultation material was sent to a list of local stakeholders including schools and community groups
- 4.5 610 responses were received giving a response rate of 47.4%. 115 responses were removed from reporting because they were duplicates (11), empty properties (3), outside the area (81) no address given (20). Full details can be found in the consultation report Appendix D
- 4.6 Overall 66% of respondents were in favour of a residents' parking scheme and 34% against. 76% were in favour of a Monday to Sunday 9am to 8pm scheme and 24% in favour of a Monday to Friday 9am to 8pm scheme. 63% were in favour of being part of the existing Area J London Road station scheme.
- 4.7 The majority of respondents in every road were in favour with the exception of Preston Drove which was 56% against.
- 4.8 Analysis took place of all comments received from residents in the proposed area and the comments table is within appendix D. The two most frequently occurring comments were (139) that parking restrictions already implemented were the problem and that existing schemes should be removed and (101) that they did not want to pay for parking. Other comments included concerns about displacement, wanting a light touch scheme and not wanting mobile phone parking.

Additional consultation & representations

- 4.9 In addition to the returned questionnaires the council received some direct correspondence from residents and stakeholders. From inside the area there were 5 negative comments and 7 general comments. From outside the area

there were 13 negative comments which were mainly concerned with either objecting to the possible displacement or asking to be included in the scheme because of existing parking problems.

- 4.10 A comments book was available at the public exhibition. 13 individuals commented, mostly positive or general comments. Examples were: "I think this is well needed and local parking should be for residents", "please scrap this costly folly", "double yellow lines on corners should eradicate inconsiderate parking"
- 4.11 An on line petition against the scheme (154 signatures) was received via the web site Change.org from the Fiveways triangle area. The petition objects to the growth of parking schemes and consequent displacement, objects to schemes being introduced with less than 50% of forms returned, consultation responses only being sent to each household rather than every resident and the failure to mention fees for bay suspensions in the consultation material.
- 4.12 A written petition signed by 13 traders in the Upper Preston Drove parade of shops was received, expressing concerns about the need for any restrictions to operate on a Saturday, and concerning the provision of adequate and safe loading facilities.
- 4.13 A written petition was received from 15 residents of Southdown Road objecting to the proposed echelon parking arrangements. In addition a letter was received from East Sussex Fire Service expressing concerns that echelon parking may restrict their access to the road due to its width.
- 4.14 Correspondence was received from various sport and leisure stakeholders in the area: Preston Park lawn tennis & croquet clubs, eight individual representations from tennis club members, the Lawn Tennis Association, the council's sports development manager and three B&HCC councillors. The concerns are mainly about the cost to non resident users of pay parking and that this may affect the viability of the facilities. It is also requested that if a scheme is introduced then 3 hour free parking bays are introduced in Preston Drove.
- 4.15 At least two well attended public meetings were held in the area to discuss parking issues, the first was held in August 2013, before the consultation began and the second on 19th December. Officers and ward members were present at the first meeting and ward members and Cllr Davey were present at the second meeting. Numerous comments and suggestions were made at these meetings which informed the design and consultation process. A survey and blog comments contributed to by 110 residents was put forward at the Dec 13 meeting (PPT.wordpress.com). 110 equates to about 9% of households. The survey is available to view by committee members. Comments made at the meeting and in the survey include, lack of any city transport plan or parking strategy, failure to consider light touch, low take up of adjoining area J/underutilisation of roads, consultation unfair and undemocratic as not giving more options and sent to households not individuals, and lack of a specific equalities impact assessment for this scheme.
- 4.16 A written representation was received from Cllr Sue Shanks, Withdean ward requesting that Preston Drove not be included in the scheme

Parking Surveys

- 5.17 Parking surveys (Appendix E) of capacity and duration were undertaken in Saturday 14th September and Tuesday 17th September 2013 between 5am and 6pm. The survey periods were chosen to reflect weekday and weekend demand, to identify residential demand at 5am and too identify visitor or commuter demand during the day.
- 5.18 To estimate the capacity of each surveyed street the total length, in metres of all disabled, parallel parking bays and unrestricted kerb length was calculated and divided by six metres to give the total available length of parking space. There are 1169 spaces available.
- 5.19 Peak demand is on Saturday at 5am with 98% of all available parking spaces taken, on weekdays demand is less ranging from 78% at 4pm to 95% at 5am.
- 5.20 In summary Preston Park Triangle experiences a high demand for parking spaces, overnight this demand is from local residents and often exceeds capacity. During the day when residential demand is reduced overall demand is still considered high, albeit reduced from overnight demand levels. It is anticipated that residents are likely to be experiencing difficulty when they return home in the evening changeover period and are competing with commuters or visitors who have not yet departed. The results suggest weekend demand is high in this area.

Vehicle ownership in the area

- 5.21 According to ONS census 2011 data average car ownership for the city is 0.86 per household. Ownership in the PPT area is slightly higher varying from 0.9 per household in Preston Drove to 1 per household in Waldegrave Road. The census shows 1123 vehicles in the area overall. Therefore according to census figures there is a capacity for vehicles in the available road space.
- 5.22 Some residents express concern that the questionnaire returns suggest a figure of 1.3 vehicles per household, in which case there would be a shortfall of over 200. It is suggested that vehicle owners are more likely than non vehicle owners to reply to the survey and therefore the census is a more accurate reflection, however this cannot be known with certainty.
- 5.23 It should be added that in the detailed design of controlled parking schemes in Brighton & Hove officers allow 5.5m (not 6m) per vehicle so the overall number of spaces is likely to be 9% higher at c. 1274

Consultation results and views of stakeholders

- 5.24 There is a clear majority (66%) in favour of a controlled parking scheme, in favour of a Monday to Sunday scheme (76%) and as an extension to Area J (63%). There was only one road against a scheme - Preston Drove at 56% No and 44% Yes. If this road is removed then the remaining area is 70% Yes and 30% No

- 5.25 Ward members from both affected wards have been consulted with responses received from all Preston Park ward councillors and one Withdean ward councillor show all in favour of a Monday to Sunday scheme as an extension to Area J and for the exclusion of Preston Drove.

Specific concerns expressed by residents and other stakeholders

- 5.26 *Problem is as a result of Area J extension – either abolish that extension or allow residents to park in that extension.* Officer response – abolishing the existing scheme would require fresh consultation with residents in that area and there is no guarantee it would be supported. Feedback from most residents to ward members has been positive and in general 84% of residents in a parking scheme wish to remain in a scheme according to the City Wide Parking Review (CWPR) report Transport Committee Jan 13. Allowing out of area residents to obtain permits was considered and rejected by the CWPR due to capacity concerns.
- 5.27 *Introduce light touch instead to deal with what is mainly a commuter problem.* Officer response - The agreed policy recommendation of the CWPR was not to consider further light touch schemes due to these not resolving the issue of displacement of cars into adjoining areas, lacking flexibility in their operation and having negative impacts on general visitors, disabled visitors and on local businesses and amenities. Light touch was therefore not offered as an option in the questionnaire. Parking surveys also show that parking problems are not caused solely by commuters but also by resident demand.
- 5.28 *Cost of permits is too high/purely money making exercise.* Officer response – The level of charges is set at a level to meet the council's traffic management objectives, such as to relieve congestion and deal fairly with demand, as there are permit waiting lists in many other areas. The scheme must also be self financing, with charges and fines covering the enforcement, maintenance and administration of the scheme. By law, if any money is left over it must be spent on transport improvements in the city
- 5.29 *The scheme will cause displacement into adjoining streets and/or streets in the existing area J are underutilised.* Officer response – The new scheme might mean more cars parking in areas just outside the zone, although the level is difficult to predict this is because driver behaviour changes and where vehicles may go cannot be known in advance of a scheme introduction (e.g. some commuters using the local area may choose alternative means of travel or pay to park within the scheme). However previous experience has shown that there can be a degree of displacement to neighbouring areas. Equally officers feel that not to proceed with a scheme in the proposed area would not be fair on residents suffering parking pressures and safety issues. Site visits by officers supported by resident's observations indicate that certain streets e.g. Stanford Avenue and Preston Park Avenue in the existing area J are operating under capacity. It is felt that by proposing an extension to Area J these streets will operate at better capacity.
- 5.30 *The consultation was not democratic and therefore flawed due to: low turnout, limited options, responses accepted by household only. A resident commissioned survey (Wordpress) shows opposition to the proposals.* Officer response – The turnout of 47% is rather high by parking consultation standards,

the average being c.33% and the results clear (66% Yes). The options presented were considered the best and most practical following previous experience and council policy decisions. Presenting too many different options would not result in a clear outcome supported by a majority of respondents. An open comments box was provided and collated from the postal questionnaire to allow expression of alternative viewpoints. All comments and representations have been considered by officers. The residents survey and report has been considered by officers but is not considered reliable because the methodology is not specified. Although 110 responses were received there is no information on how residents were contacted and how they responded. The response rate is also 9% compared to 47% from the council's survey. For consultation purposes the council is only able to identify households and businesses through use of the Land & Property Gazetteer and cannot accurately identify the number of individuals at a property. There would therefore be a risk of duplication of responses.

- 5.31 *Don't want pay by mobile /don't use mobile phones.* Officer response – The scheme proposes a ratio of 70:30 pay by mobile/pay and display. Pay and display machines are costly to install and maintain and some people find them intrusive on the street scene. In some places machines cannot be located without requiring changes to highway layout which would lead to loss of parking spaces. This is because there is no footway. However it is accepted that to reduce the impact on non phone users that for the time being a pay by phone facility should complement rather than replace pay and display machines. There is no currently authorised sign for a shared permit/pay by mobile facility under the Traffic Signs Regulations and General Directions 2002 so an application to the Department of Transport is being made for future scheme proposals. This can take several months and approval is not guaranteed
- 5.32 Concerns about *Preston Drove & Southdown Road*. Officer's response, Preston Drove – It is the view of the majority of respondents in Preston Drove and of four ward councillors that Preston Drove should be removed from the scheme. The advantage of this is that could form an effective boundary against displacement to streets further north given the extent of road space without frontages. The number of parking spaces in this street exceeds the number of households by a ratio of at least 4:1. It could also provide parking opportunities for visitors to the tennis and croquet club and other amenities. The disadvantage is that it would reduce significantly the number of spaces in the proposed parking scheme and the street may suffer displacement parking. The loss of spaces overall could be an issue if the Preston Park Triangle was a stand- alone scheme so if Preston Drove is removed then there is even more reason for the triangle to be an extension to the existing Area J which is currently operating under capacity. Officer recommendation – on balance, and taking into account stakeholder views Preston Drove should be removed from the scheme.
Southdown Road - concerns about proposed echelon parking. Officer response – it is agreed that the scheme is amended so that there is parallel parking only proposed for this road
- 5.33 *Site specific comments* - A number of site specific comments were received, these were not objections to the scheme in principle and these will be considered at the detailed design stage if committee approves this report (as amended).

Conclusions

- 5.34 As outlined in the report there is a positive opinion from the majority of respondents within the Preston park triangle (with the exception of Preston Drove) to indicate sufficient public support for the extension of the current Area J resident parking scheme. Therefore the recommendation is that the proposed (with the exception of Preston Drove) be progressed to final design and advertised through a traffic regulation order. Ward councillors have been consulted and are happy to proceed to Traffic Order
- 5.35 As part of the consultation undertaken in the schemes regard has been given to the free movement of traffic and access to premises since traffic flow and access issues have generated request from residents and in part a need for measures being proposed. The provision of alternative off-street parking spaces has been considered by officers when designing the schemes but there are no opportunities to go forward with any of street spaces due to the geographical layout of the area and existing parking provision in the area.

6. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 6.1 An alternative option would be to proceed in whole or in part as a stand- alone scheme either Monday to Friday 9am - 8pm or Monday to Sunday 9am – 8pm This option is not supported by residents or ward members and it is the recommendation of officers that this is not the most effective way to manage parking in the area for the reasons outlined in the report.
- 6.2 A second option is to include Preston Drove and/or additional roads to the north but it is the recommendation of officers that proposals put forward are proceeded with for the reasons outlined in the report.
- 6.3 A third option is to introduce a light touch restriction into the area of one hour in the morning and one hour in the afternoon or evening. This option was not consulted upon but the council has received many comments in favour. Current policy as set by transport Committee in January 2013 rules out new light touch schemes in the city and it is also the recommendation of officers that the proposals put forward are proceeded with for the reasons set out in the report.
- 6.4 A further option is to do nothing but this would not address the parking problems and would not reflect the expressed views of the community and ward members

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

The revenue costs associated with the recommendations in the report will be met from existing transport revenue budgets. The capital costs associated to the creation and extension of parking schemes are funded by unsupported borrowing, with appropriate repayments made over a seven year period funded from the revenue income generated.

Revenue income generated from on-street parking schemes is first defrayed against relevant expenditure with any surplus used for transport and highways

related projects and expenditure such as supported bus services, concessionary fares and Local Transport Plan projects.

Finance Officer Consulted: Name Steven Bedford

Date: 24/01/14

Legal Implications:

- 7.2 The Council regulates traffic by means of orders made under the Road Traffic Regulation Act 1984 ("the Act"). Procedural regulations require public notice of orders to be given and any person may object to the making of an order. Any unresolved objections to an order must be considered by the Transport Committee before it can be made.
- 7.3 The Council is under a duty to exercise its powers under the Act secure the safe and convenient movement of traffic and the provision of adequate on and off-street parking facilities. It must also take into account any implications that orders would have for access to premises, local amenity, air quality, public transport provision and any other relevant matters.
- 7.4 In considering what parking places are to be designated under the Act the Council must consider both the interests of traffic and those of the owners and occupiers of adjoining property. In particular the matters which the Council must have in mind include: (a) the need for maintaining the free movement of traffic; (b) the need for maintaining reasonable access to premises; and (c) the extent to which off-street parking accommodation, is available in the neighbourhood or the provision of such parking accommodation is likely to be encouraged there by the designation of parking places.
- 7.5 The Council is entitled to set parking charges at levels that will enable it to meet its traffic management objectives by e.g. managing supply and demand for parking. Under section 55 of the Road Traffic Regulation Act 1984, as amended by the Traffic Management Act 2004, the Council must keep an account of all parking income and expenditure in designated (i.e. on-street) parking spaces which are in a Civil Enforcement Area, and of their income and expenditure related to their functions as an enforcement authority. Regulations and guidance confirm that in respect of off-street parking places, the term "income and expenditure as enforcement authorities" includes that related to the issue of PCNs. It does not, for example, include pay and display or permit/season ticket income or the direct expenditure relating to collecting that income.
- 7.6 The use of any surplus income from civil parking enforcement is governed by section 55 of the Road Traffic Regulation Act 1984 as amended. This allows any surplus to be used for transport and highways related projects and expenditure such as supported bus services, concessionary fares and Local transport Plan projects.
- 7.7 Under the Act the Council may acquire, whether by purchase or by hiring, such parking meters and other apparatus as appear to it to be required or likely to be required for the purposes of its functions in relation to designated parking places.
- 7.8 The Council is under a legal duty as a public authority to consider the human

rights implications of its actions. Parking and traffic restrictions have the potential to affect the right to respect for family and private life and the right to protection of property. These are qualified rights and therefore there can be interference with them where this is necessary, proportionate and for a legitimate aim.

Lawyer Consulted:

Carl Hearsom

Date: 20/01/14

Equalities Implications:

- 8.1 The control of double parking, parking on pavements and protection of junctions and crossings will improve access for all but the mobility impaired and vulnerable road users in particular
- 8.2 Access to public transport will be improved
- 8.3 Disabled (blue badge drivers) will be able to obtain a reduced charge resident permit and will be able to park in any shared or pay and display/pay by mobile bays free of charge and without time limit.
- 8.4 Regulation of parking demand will improve access for all road users and also improve access to local shops and amenities including Blaker's Park
- 8.5 A permit will be available for non professional carers if endorsed by their GP. Professional carers may apply for a professional carers badge issued by health organisations.
- 8.6 A general equalities impact assessment has been carried out on the impact of resident parking schemes

Sustainability Implications:

- 9.1 Managing parking will increase turnover and parking opportunities for all helping to reduce congestion and air pollution.

Crime & Disorder Implications:

- 10.1 The proposed scheme will improve the management of obstructive parking

Risk and Opportunity Management Implications:

- 11.2 There are none

Public Health Implications:

- 12.3 The proposed scheme will help to manage congestion which may have a positive impact on air quality

Corporate / Citywide Implications:

13.1 There are none.

SUPPORTING DOCUMENTATION

Appendices:

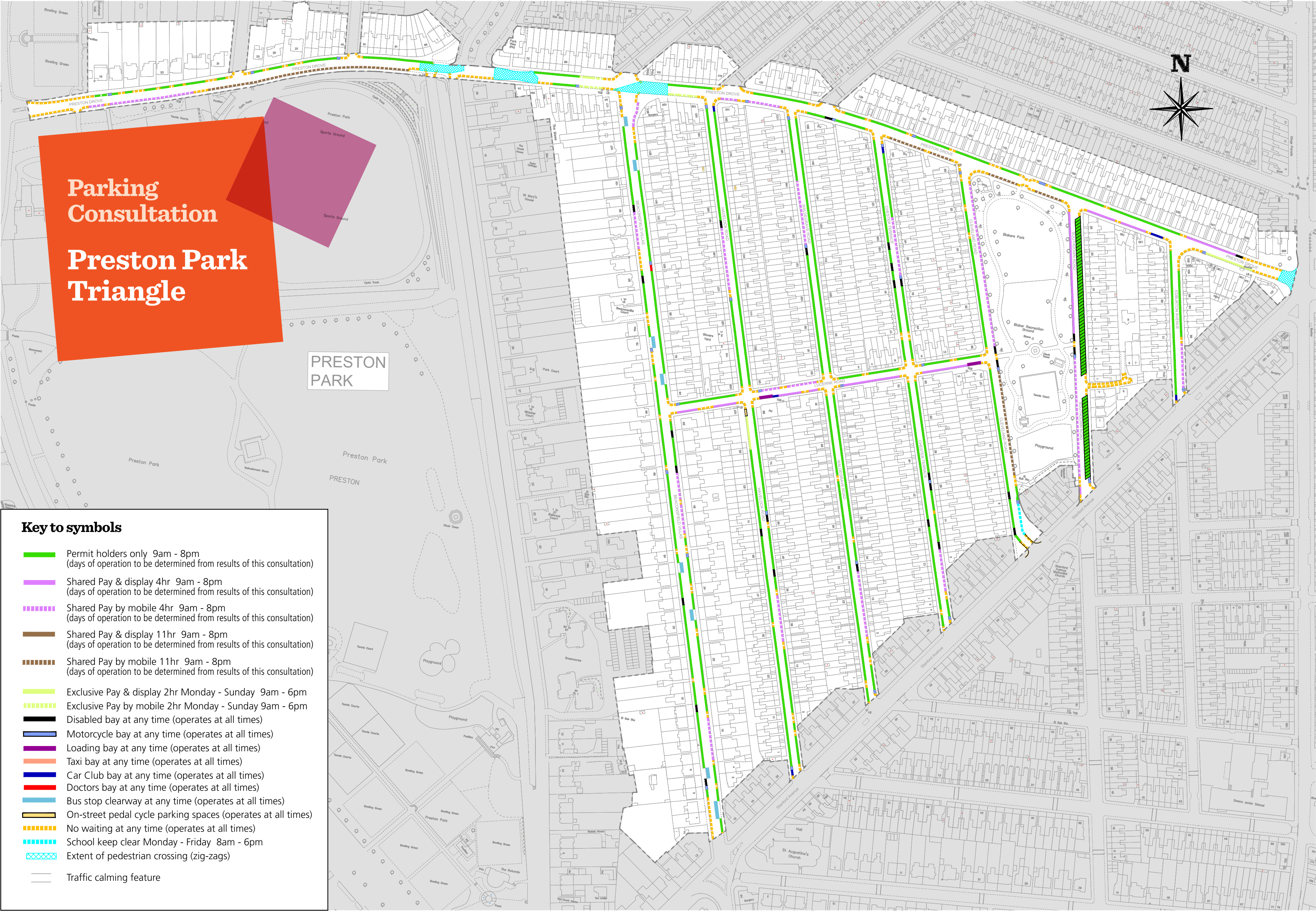
- 1. Appendix A Consultation leaflet
- 2. Appendix B Consultation plan
- 3. Appendix C Consultation questionnaire
- 4. Appendix D Consultation report
- 5. Appendix E Parking survey report

Documents in Members' Rooms

- 1. Resident survey and blog (wordpress)

Background Documents

- 1. None



Key to symbols

- Permit holders only 9am - 8pm
(days of operation to be determined from results of this consultation)
- Shared Pay & display 4hr 9am - 8pm
(days of operation to be determined from results of this consultation)
- Shared Pay by mobile 4hr 9am - 8pm
(days of operation to be determined from results of this consultation)
- Shared Pay & display 11hr 9am - 8pm
(days of operation to be determined from results of this consultation)
- Shared Pay by mobile 11hr 9am - 8pm
(days of operation to be determined from results of this consultation)
- Exclusive Pay & display 2hr Monday - Sunday 9am - 6pm
- Exclusive Pay by mobile 2hr Monday - Sunday 9am - 6pm
- Disabled bay at any time (operates at all times)
- Motorcycle bay at any time (operates at all times)
- Loading bay at any time (operates at all times)
- Taxi bay at any time (operates at all times)
- Car Club bay at any time (operates at all times)
- Doctors bay at any time (operates at all times)
- Bus stop clearway at any time (operates at all times)
- On-street pedal cycle parking spaces (operates at all times)
- No waiting at any time (operates at all times)
- School keep clear Monday - Friday 8am - 6pm
- Extent of pedestrian crossing (zig-zags)
- Traffic calming feature

Equalities monitoring form

We want to make sure that our services are available to everyone in the community and that everyone is treated fairly when they use our services. We will only use this information to help us improve services and identify gaps or barriers. Please fill in as much of the information as you feel comfortable with. It is anonymous and confidential.

What age are you? years ☐ Prefer not to say

What gender are you? ☐ Male ☐ Female ☐ Other (please state)

Do you identify as the gender you were assigned at birth?
(For people who are transgender, the gender they were assigned at birth is not the same as their own sense of their gender.) ☐ Yes ☐ No ☐ Prefer not to say

How would you describe your ethnic origin?

White <input type="checkbox"/> English/Welsh/Scottish/ Northern Irish/British <input type="checkbox"/> Irish <input type="checkbox"/> Gypsy or Irish Traveller <input type="checkbox"/> Any other White background (please give details): <input type="text"/>	Black or Black British <input type="checkbox"/> African <input type="checkbox"/> Caribbean <input type="checkbox"/> Any other Black background (please give details): <input type="text"/>	Asian or Asian British <input type="checkbox"/> Bangladeshi <input type="checkbox"/> Indian <input type="checkbox"/> Pakistani <input type="checkbox"/> Chinese <input type="checkbox"/> Any other Asian background (please give details): <input type="text"/>
Other Ethnic Group <input type="checkbox"/> Arab <input type="checkbox"/> Any other Asian background (please give details): <input type="text"/>	Mixed <input type="checkbox"/> Asian & White <input type="checkbox"/> Black African & White <input type="checkbox"/> Black Caribbean & White <input type="checkbox"/> Any other mixed background (please give details): <input type="text"/>	<input type="checkbox"/> Prefer not to say After you have ticked a box: If there is an ethnic category that is not included here that you think should be, please tell us what: <input type="text"/>

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? ☐ Yes a little ☐ Yes a lot
☐ No (do not answer the next question) ☐ Prefer not to say (do not answer the next question)

If you answered 'yes', please state the type of impairment. If you have more than one please tick all that apply. If none apply, please mark 'other' and write an answer in.

<input type="checkbox"/> Physical Impairment	<input type="checkbox"/> Long-standing Illness	<input type="checkbox"/> Mental Health Condition
<input type="checkbox"/> Sensory Impairment	<input type="checkbox"/> Learning Disability/Difficulty	<input type="checkbox"/> Developmental Condition
<input type="checkbox"/> Other (please state) <input type="text"/>		

Thank you for taking the time to complete this questionnaire

Please use the supplied pre-paid envelope and return by Friday 20 December 2013

Translation? Tick this box and take to any council office.

ترجمة؟ ضع علامة في المربع وخذها إلى مكتب البلدية.	Arabic	<input type="checkbox"/>
অনুবাদ? বক্সে টিক চিহ্ন দিয়ে কাউন্সিল অফিসে নিয়ে যান।	Bengali	<input type="checkbox"/>
需要翻譯? 請在這方格內加劃, 並送回任何市議會的辦事處。	Cantonese	<input type="checkbox"/>
ترجمه? لطفا این مربع را علامتگذاری نموده و آن را به هر یک از دفاتر شهرداری ارائه نمایید.	Farsi	<input type="checkbox"/>
Traduction? Veuillez cocher la case et apporter au conseil.	French	<input type="checkbox"/>
需要翻译? 请在这方格内划勾, 并送回任何市议会的办事处。	Mandarin	<input type="checkbox"/>
Tłumaczenie? Zaznacz to okienko i zwróć do któregoś z biura samorządu lokalnego (council office).	Polish	<input type="checkbox"/>
Tradução? Coloque um visto na quadrícula e leve a uma qualquer repartição de poder local (council office).	Portuguese	<input type="checkbox"/>
Tercümesi için kareyi işaretleyiniz ve bir semt belediye bürosuna veriniz	Turkish	<input type="checkbox"/>
	other (please state)	<input type="checkbox"/>

This can also be made available in large print, Braille, or on CD or audio tape

Residents parking questionnaire

Preston Park Triangle Area

This questionnaire is designed to gauge support for the principle of introducing a residents parking scheme into your area.

Please use the information provided in the enclosed leaflet to help answer these questions.

To make sure your views are considered please take the time to complete this questionnaire by **Friday 20 December 2013** and return it using the FREEPOST envelope provided. NO STAMP IS REQUIRED.

Or you can complete this online at <http://consult.brighton-hove.gov.uk/portal>

One submission is permitted from each household so please do discuss this with people you live with to ensure the returned questionnaire reflects the views of the occupants.



Q1 Are you in favour of a residents parking scheme in your road?

☐ Yes

☐ No

Q2 What type of scheme would you prefer?

Please see leaflet for explanation.

☐ a) Monday to Sunday 9am to 8pm

☐ b) Monday to Friday 9am to 8pm

Q3 If a Monday to Sunday 9am to 8pm scheme was chosen would you like to join the existing Area J (London Road station area)?

☐ Yes

☐ No

Q4 Please tick all of the following that apply to you:

☐ You own or manage a business within the proposed parking area boundary

☐ You are a resident within the proposed parking area boundary

☐ You work within the proposed parking area boundary

☐ Other (please state below)

If you are a resident of the area please answer question 5. If you own or manage a business in the area please answer question 6.

If you are both a resident and business owner/manager, please complete both Q5 and 6 etc

Q5a How many cars in your household?

☐ 0

☐ 1

☐ 2

☐ 3

☐ 4 or more

Q5b Do you have access to off-street car parking?

☐ Yes

☐ No

**Q6a What type of business do you own or manage in the area?
Please tick all that apply?**

☐ Retail outlet

☐ Office based

Other (please state below)

Q6b How many vehicles are directly associated with your business?

☐ 0

☐ 1

☐ 2

☐ 3

☐ 4 or more

Q7 Please use the space below to write any other comments you have about the proposed scheme.

Q8 We will need your name and address to prevent multiple submissions of questionnaires from households.

Name

Address

Appendix D

Preston Park Triangle Area Residents Parking Scheme Consultation Report January 2014

Background

The Preston Park Triangle Area of Brighton is an area immediately to the north of the recently introduced Area J extension in the London Road Station North area of the city. The area is contained within the boundary roads of Stanford Avenue, Preston Drove and Beaconsfield Villas. It has long experienced parking pressures due to its proximity to Preston Park recreation ground and sports facilities, the railway stations of London Road and Preston Park and the relative closeness to the city centre. For these reasons and due to requests from residents and ward councillors it was included in a timetable for parking schemes consultations as part of the City Wide Parking Review recommendations approved by Transport Committee in January 2013.

Following the introduction of the Area J extension in July 2013, the council received a number of complaints and petitions from residents in the Preston Park Triangle about general difficulties in parking and the belief that this was at least partly caused by displacement from that new extension. Therefore it was agreed that consultation on a resident parking scheme should take place as soon as possible within the timeframe set out in the committee report.

Headline Findings

The consultation achieved a 47.4% response rate.

65.7% of respondents were in favour of an extension to the Residents Parking Scheme and 34.3% of respondents were against the extension of the scheme.

Methodology

Brighton and Hove City Council Land and Property Gazeteer was used to provide 1287 property addresses in the Preston Park Triangle Area. An information leaflet, detailed maps, a questionnaire and a prepaid envelope for reply was sent to each address. Respondents were invited to complete the survey online via the council's Consultation Portal should they wish to: 127 respondents (21%) chose this method.

Plans could also be viewed at an exhibition held at Hove Town Hall parking Shop from Monday 11 November to Friday 20 December, 9am to 5pm.

610 responses¹ were received giving a response rate of 47.4%.

¹ 115 responses were not included and area discussed in the Appendix.

Results

Q1 Are you in favour of a residents parking scheme extension into your road?

Yes		No		Total
Number	%	Number	%	
392	65.7	205	34.3	597 ²

Results on a street by street basis were as follows:

Street	No. properties mailed	No. responses	Response rate %	Yes		No	
				No.	%	No.	%
Beaconsfield Villas	299	117	39.1	77	65.8	40	34.2
Chester Terrace	141	83	58.9	52	62.7	31	37.3
Cleveland Road	74	38	51.4	28	73.7	10	26.3
Edburton Avenue	36	17	47.2	13	76.5	4	23.5
Havelock Road	247	112	45.3	92	82.1	20	17.9
Lucerne Road	16	7	43.8	4	57.1	3	42.9
Preston Drove	250	96	38.4	42	43.8	54	56.3
Southdown Place	8	7	87.5	4	57.1	3	42.9
Southdown Road	28	21	75	12	57.1	9	42.9
Stanford Avenue	6	0	0	0	0	0	0
Surrenden Road	4	1	25	1	100	0	0
Waldegrave Road	178	98	55.1	67	68.4	31	31.6
Total	1287	597	46.4	392	65.7	205	34.3

Q2 What type of scheme would you prefer?

	Number of responses	%
Monday to Sunday 9am to 8pm	373	76.1
Monday to Friday 9am to 8pm	117	23.9
Total	490	100

Q3 If a Monday to Sunday 9am to 8pm scheme is chosen would you like to join the existing Area J (London Road station area)?

Yes		No		Total
Number	%	Number.	%	
300	63.2	175	36.8	475

² 13 people did not answer this question

Q4 Respondents were asked whether they are a resident, a business owner or manager or work in the area. Respondents could tick more than one option.

	Number of responses
Resident	588
Business owner or manager	50
Work in the area	48
Other	4

Q5a How many cars in your household?

No. of cars	Number of responses	Total number of cars
0	41	0
1	370	370
2	158	316
3	18	54
4 or more	4	≥16
Total	591	≥756

591 respondents have 756 vehicles (= 1.3 vehicles per household).

Q5b Do you have access to off-street car parking?

Yes		No		Total
Number	%	Number	%	
38	6.7	525	93.3	563

Q6a What type of business do you own or manage in the area?

What type of business?	Number of responses
Retail outlet	12
Office-based	22
Other includes: Nursery, doctors practice, dress maker, tutor, work from home, physiotherapy, veterinary practice	23
Total responses	57

Q6b How many vehicles are directly associated with your business?

No. of vehicles	Number of responses	Total number of vehicles
1	27	27
2	8	16
3	2	6
4 or more	10	≥40

Total	47	≥89
--------------	-----------	------------

47 respondents had at least 89 vehicles associated with their business (= 1.9 vehicles per business).

Q7 Any other comments?

An open text box enabled respondents to add comments. Although expressed in residents' own words analysis of the open text shows common themes emerged and have been grouped as followed below. The figures show the amount of times a comment was made which is in some cases from the same household.

Comments	Number of times made
Parking restrictions already implemented are the problem/ No problems before Area J/ remove CPZ's	139
Don't want to pay for parking	101
Concerned about displacement	85
In favour because of current parking difficulties/ general positive comments	59
Want light touch scheme (eg two hours a day)/ prefer other flexible parking schemes	58
Need scheme ASAP/ Too long to wait	46
This is purely a money making exercise	39
Not enough residents parking spaces in this scheme/ will need more than one permit	37
Concerned about the cost of visitor parking	37
General negative comments	36
Unhappy about hours of scheme operation	33
No need for a scheme/ Unnecessary	23
Concerns that the scheme will adversely affect businesses in the area	21
Scheme won't help after 8 parking situation	20
Not enough visitor permits	17
Don't like the chevron parking/ not safe for children using the park	17
Needs enforcement of current illegal parking	16
Don't want signs and P&D in conservation area	14
Don't want mobile payments/ Don't use mobiles to pay	12
Don't want double yellow lines across driveways/ don't want more double yellow lines	11
Need other traffic calming/ more creative options/ speed humps	11
Concerns about disabled parking	5
More loading bays needed	4
Need more motorbike bays	3
Confused about what is Area J	2

Demographic Information

Gender

Gender	Number	%
Male	237	48.4
Female	253	51.6
Total	490	100

Do you identify as the gender you were assigned at birth?	Number	%
Yes	381	98.4
No	6	1.6
Total	387	100

Age

Age	Number	%
18-24	3	0.7
25-34	36	8.5
35-44	99	23.3
45-54	124	29.2
55-64	93	21.9
65-74	49	11.6
75+	20	4.7
Total	424	100

Disability

Disability	Number	%
Yes, a little	32	6.8
Yes, a lot	26	5.6
No	410	87.6
Total	468	100

Of those who answered “yes”, disabilities were as follows:

Please state the type of impairment which applies to you.	Number	% ³
Physical impairment	39	67.2
Sensory impairment	3	5.2
Learning disability/ difficulty	0	0
Long-standing illness	17	29.3
Mental health condition	5	8.6
Development condition	2	3.4
Other	7	12.1
Total	73	

³ % of those who answered yes to the disability question above

Ethnicity

Ethnicity		Number	%
White	White English/ Welsh/ Scottish/ Northern Irish/ British	447	92.5
	White Irish	4	0.8
	Gypsy or Irish Traveller	0	0
	Any other white background	25	5.2
Asian or Asian British	Bangladeshi	0	0
	Indian	1	0.2
	Pakistani	0	0
	Chinese	0	0
	Any other Asian background	1	0.2
Black or Black British	African	1	0.2
	Caribbean	0	0
	Any other Black background	0	0
Mixed	Asian & White	4	0.8
	Black African & White	0	0
	Black Caribbean & White	0	0
	Any other mixed background	0	0
Any other ethnic group	Arab	0	0
	Any other ethnic group	0	0
Total		483	100

Appendix

115 responses were removed from reporting as they fell into the following categories:

- Duplicates (only one responses per household was included)
- Responses from residents outside the area, including those using sports facilities at Park Park Tennis Club, Preston Park Cycle Track and St Peters Cricket Club who use the Cricket pitch at the cycle track.
- No address given
- Empty flats under refurbishment

75% of these responses were against the introduction of a parking scheme in the Preston Park Triangle area as show in the table below:

Why removed from main report	In favour of parking scheme		Not in favour of parking scheme		Total
	Number	%	Number	%	
Duplicates	7	63.6	4	36.4	11
No address given	10	50.0	10	50.0	20
Outside area (roads to the north of proposed boundary)	5	20.8	19	79.2	24
Outside area (roads to the north and users of sports facilities ⁴)	1	25.0	3	75	4
Outside the area	2	8.3	22	91.7	24
Outside the area (users of the sports facilities ⁴)	3	10.3	26	89.7	29
Flats under refurbishment	-	-	-	-	3
Total	28	25.0	3	75.0	115

⁴ Includes Preston Park Lawn Tennis Club, cycle track, St Peters Cricket Club

Preston Park Triangle Area

Parking Survey Analysis



Originator	Checker	Approver
Matthew Ring	Richard Hearle	Richard Hearle
Office	Date	Your reference
Croydon – Voyager House	18/10/2013	329535/PSV/01

INTRODUCTION

This summary note provides analysis of parking surveys undertaken by East Sussex County Council on behalf of Mott MacDonald in the Preston Park Triangle area of Brighton on Saturday September 14th and Tuesday September 17th 2013.

Brighton & Hove City Council authorised Mott MacDonald to commission the surveys in the streets shown in the attached plan (MMD-244884-C-M2-00-XX-7001) to understand parking characteristics and demand within the defined study area.

The surveys are a repeat of parking surveys undertaken in June 2012 in Beaconsfield Villas, Waldegrave Road, Cleveland Road and Edburton Avenue. This data has facilitated comparisons to be made between the period before and after Controlled Parking Zone (CPZ) was introduced in the streets immediately south of Stanford Avenue.

METHODOLOGY

On Saturday October 14th 2013 and Tuesday October 17th 2013 two types of surveys were undertaken:

- Accumulation surveys recording number plate data at 5am / 10am / 1pm / 4pm
Beaconsfield Villas (between Stanford Avenue and property no. 104), **Chester Terrace** (entire length), **Cleveland Road** (entire length), **Havelock Road** (between Stanford Avenue and property no. 93 and between Preston Drove and property no. 108), **Lucerne Road** (between Waldegrave Road and Cleveland Road), **Preston Drove** (the section between Preston Road and Surrenden Road and the section between Havelock Road and property no. 205) and **Southdown Road** (entire length).
- Hourly beat surveys recording number plate data between 8am and 6pm
Beaconsfield Villas (between property no. 104 and Preston Drove), **Edburton Avenue** (entire length), **Havelock Road** (between property no. 93 south of Lucerne Road and property no. 108 north of Lucerne Road), **Lucerne Road** (between Waldegrave Road and Beaconsfield Villas), **Preston Drove** (the section between Surrenden Road and Havelock Road and the section between property no. 205 and Ditchling Road).

To estimate the capacity of each surveyed street the total length, in metres, of all disabled, parallel parking bays and un-restricted kerb length was calculated and divided by six metres to give the total length of available parking space. These calculations were provided by the survey company.

Data was also collected on illegally parked vehicles during each survey. This included numbers of vehicles parked on DYL's, across dropped kerbs and those double parked.

The survey periods were chosen to identify any residential demand at 5am and to identify visitor or commuter demand throughout the day.

Both days were non match or event days at the American Express Community Stadium.

DISCUSSION OF RESULTS

Beat Surveys

This section discusses the attached tables of results.

Table 1 - Preston Park Triangle Beat Surveys - Tuesday 17th September 2013

Table 1 shows overnight parking on most streets was over capacity. This could be attributed to illegal parking in the form of double parking, parking across access or drop kerbs and illegal parking on waiting restrictions.

Table 1 also suggests that there was a very high base line demand from residents at 5am but this reduces throughout the day where there was, in most streets, spare capacity. This suggests commuter demand does not cause over capacity issues but is likely to impact with residents during the changeover period - residents are returning from work trying to find a parking space but are competing with visitors or commuters who have not yet departed.

Table 2 - Preston Park Triangle Beat Surveys – Saturday 14th September 2013

Table 2 shows that weekend parking demand exceeds capacity in the majority of streets. It can clearly be seen that 5am base line from residents continues throughout the day. This is expected as the majority of residents will not be driving to work at the weekend.

It should also be noted that Beaconsfield Villas south of Lucerne Road operates at higher capacity than the northern section. This could be attributed to a combination of high residential demand and displacement from the recent Area J extension.

Also, when considering these data sets events taking place at local amenities, such as Blakers Park, which could influence parking demand in the area, should be considered.

Table 3 - Weekday Parking Occupancy Difference Between 2012 and 2013

Table 3 shows an increase in 2013 parking demand compared to demand recorded in 2012. Demand in 2012 was also considerably higher, particularly overnight residential demand which exceeded 100% capacity.

The 2012 data for Beaconsfield Villas suggests it experiences greatest demand south of Lucerne Road when compared to its northern section. Again, this could be attributed to displacement from adjacent areas and a high baseline residential demand.

Table 4 - Weekend Parking Occupancy Difference Between 2012 and 2013

Cleveland Road shows very high parking occupancy during the 2013 surveys. This could be caused by being adjacent to Blakers Park, and exaggerated on good weather days.

Interestingly Edburton Avenue shows a decline in parking demand since 2012. Demand is still high but as it is the most northern street in the study area the reduction in demand could be attributed to the fact it is the street furthest from the station and Brighton town centre.

Hourly Beat Surveys

Tables 5 to 10 – Tuesday September 17th Hourly Beat Results

The data for the weekday hourly beat surveys supports the results discussed earlier. Streets surveyed operated consistently at or over capacity.

The hourly beat surveys were proposed in lengths of streets near shops or businesses where any short term, high turnover parking could be expected. Tuesday data suggests only Preston Drove

Preston Park Triangle Area

Parking Survey Analysis



at the junction with Edburton Avenue experienced short stay parking. Approximately 50% of vehicles parked did so for up to one hour. This is likely explained by the close proximity of shops.

Preston Drive near the junction with Beaconsfield Villas on some occasions operated at 70% capacity. This suggests visitors prefer to park in Beaconsfield Villas, which is not a main road.

In other streets the majority of vehicles were recorded to be parked for between 4 and 11 hours. This suggests that although there is a demand for short term parking in these areas the need for longer term parking is prevalent.

Tables 6 to 11 – Saturday September 14th Hourly Beat Results

The data for the weekend hourly beats again shows the streets operated at or over capacity.

Interestingly, the stretch of Preston Drive near the junction with Beaconsfield Villas operated over capacity for the entire day and 59% of all vehicles recorded were parked for up to one hour, compared to 40% on Tuesday. This suggests there is a much higher short term demand for parking at weekends in this location.

In the length of Beaconsfield Villas which was subject to the hourly beat surveys, both the Tuesday and Saturday surveys suggest it operates at or over capacity. Compared to the earlier surveys discussed where capacity was reduced north of Lucerne Road this suggests Beaconsfield Villas is used frequently as a short term parking area for the local retail outlets on Preston Drive and this parking demand occurs illegally on the existing waiting restrictions.

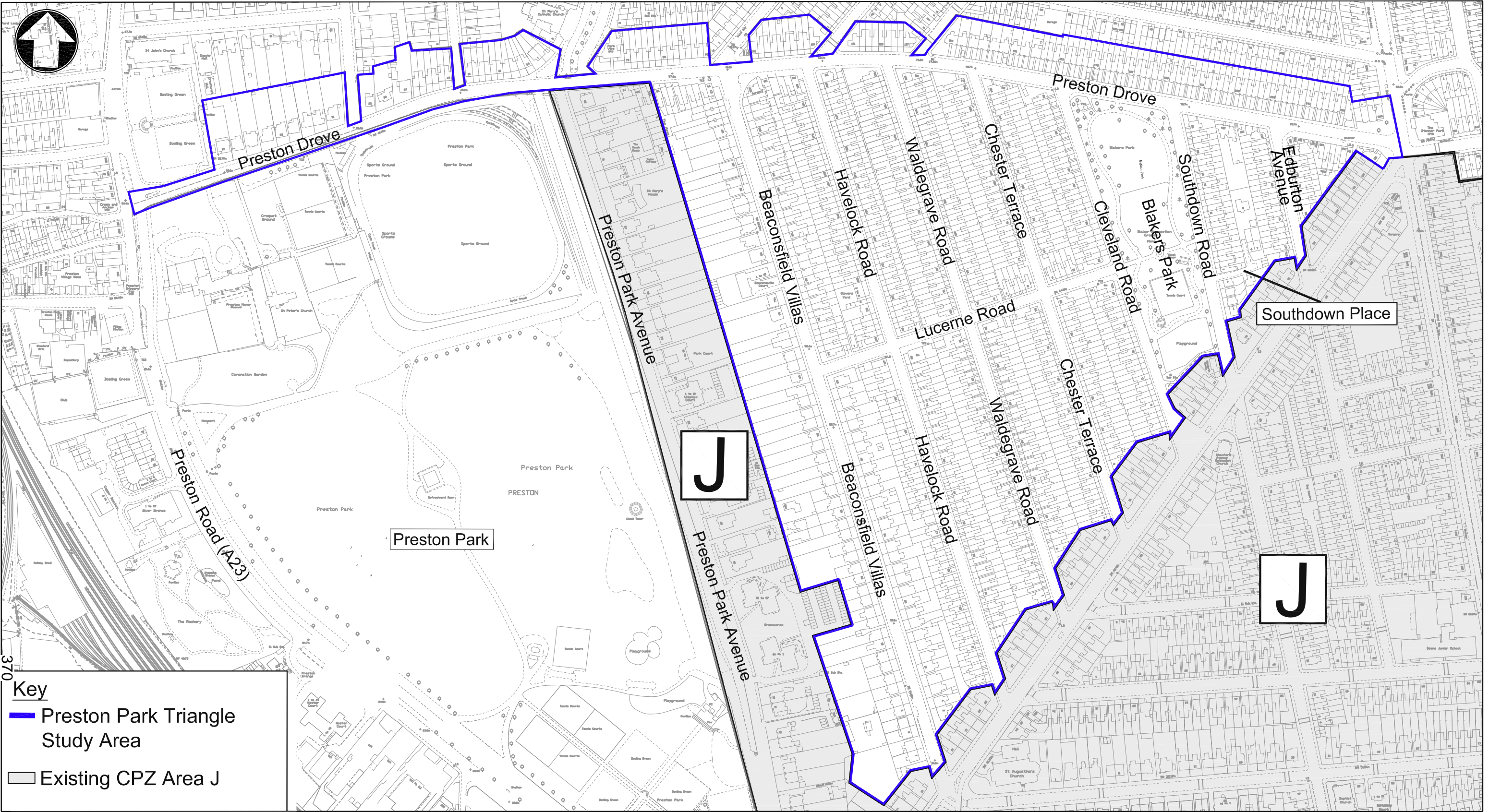
SUMMARY

The Preston Park Triangle area is experiencing high demand for parking spaces. Overnight this demand is from residents and often exceeds capacity. During the day when residential demand is reduced overall demand is still considered to be high, albeit reduced from the overnight demand levels.

It is anticipated that residents are likely to be experiencing difficulty when they return home in the changeover period and are competing with commuters or visitors who have not yet departed.

Table 17 – Spaces Occupied in Preston Park Triangle Area summarises the level of parking demand for the entire study area. On Tuesday at 5am, of the 1,169 spaces available 1,109 (95%) were occupied. Throughout the day occupancy levels decrease to 906 (78%) at 4pm.

On Saturday, 5am demand was 1,144 vehicles (98% of the total available space). This is effectively a full parking stock with the chance of finding an available parking space being minimal. Throughout the day this does not reduce below 1,044 vehicles (89% of the total available space) suggesting weekend demand is high in the area.



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<div><p>Mott MacDonald House 8-10 Sydenham Road Croydon, CR0 2EE United Kingdom</p><p>T +44 (0)20 8774 2000 F +44 (0)20 8681 5706 W www.mottmac.com</p></div>	<div><p>Brighton & Hove City Council</p></div>	Rev	Date	Drawn	Description	Ch'k'd	App'd	Title Proposed Area J Extension - Preston Park Triangle	Drawn	V Micic	
		A	25/07/13	VM	First Issue	MR	RH		Checked	M Ring	
		B	01/08/13	VM	Second Issue	MR	MR		Approved	R Hearle	
								Drawing Number MMD-244884-C-DR-00-XX-7001	Scale at A3 NTS		
									Security STD	Status INF	Rev A

Table 1 - Preston Park Triangle Beat Surveys - Tuesday 17 September 2013

Road Name	Orientation	Length of available parking (m)	Parking Space required (m)	Spaces available (no.)	At 5.00			At 10.00			At 13.00			At 16.00			Vehicles Arriving				Vehicles Departing							
					Survey Occupancy	% Occupancy	Vehicle Movements	Survey Occupancy	% Occupancy	Vehicle Movements	Survey Occupancy	% Occupancy	Vehicle Movements	Survey Occupancy	% Occupancy	Vehicle Movements	Total vehicles arriving between 5.00am and 4.00pm**	% Arriving between 5.00 - 10.00	% Arriving between 10.00 - 13.00	% Arriving between 13.00 - 16.00	Total vehicles departing between 5.00am and 4.00pm	% Departing between 5.00 - 10.00	% Departing between 10.00 - 13.00	% departing between 13.00 - 16.00				
Beaconsfield Villas	South Of Lucerne Road	792.2	6	132	136	103%			132	100%	42	46	136	103%	22	18	128	97%	15	23	79	53%	28%	19%	87	53%	21%	26%
	North of Lucerne Road	368	6	61	42	68%			38	62%	15	19	39	64%	11	10	38	62%	5	6	31	48%	35%	16%	35	54%	29%	17%
Havelcock Road	South Of Lucerne Road	677	6	113	104	92%			97	86%	30	40	97	86%	16	19	97	86%	22	24	68	44%	24%	32%	83	48%	23%	29%
	North of Lucerne Road	508	6	85	80	94%			71	84%	31	41	71	84%	19	19	76	90%	29	24	79	39%	24%	37%	84	49%	23%	29%
Waldegrave Road	South Of Lucerne Road	570	6	95	100	105%			95	100%	34	39	84	88%	3	14	95	100%	28	14	65	52%	5%	43%	67	58%	21%	21%
	North of Lucerne Road	484	6	81	90	112%			64	79%	15	41	70	87%	20	14	53	66%	4	21	39	38%	51%	10%	76	54%	18%	28%
Chester Terrace	South Of Lucerne Road	455	6	76	83	110%			66	87%	20	37	55	73%	5	16	68	90%	23	10	48	42%	10%	48%	63	59%	25%	16%
	North of Lucerne Road	414	6	69	74	107%			45	65%	7	36	43	62%	14	16	39	56%	5	9	26	27%	54%	19%	61	59%	26%	15%
Cleveland Road	South Of Lucerne Road	366	6	61	61	100%			42	69%	9	28	42	69%	6	6	41	67%	11	12	26	35%	23%	42%	46	61%	13%	26%
	North of Lucerne Road	340	6	57	59	104%			40	71%	11	30	37	65%	5	8	36	63%	7	8	23	48%	22%	30%	46	65%	17%	17%
Southdown Avenue	East Side	242	6	40	43	107%			40	99%	9	12	41	102%	7	6	40	99%	7	8	23	39%	30%	30%	26	46%	23%	31%
	West Side	260	6	43	45	104%			41	95%	16	20	36	83%	5	10	33	76%	8	11	29	55%	17%	28%	41	49%	24%	27%
Preston Drive	North side	628	6	105	69	66%			64	61%	22	27	64	61%	9	9	62	59%	15	17	46	48%	20%	33%	53	51%	17%	32%
	South side	660	6	110	74	67%			74	67%	36	36	71	65%	6	9	67	61%	11	15	53	68%	11%	21%	60	60%	15%	25%
Lucerne Road (Waldegrave Road to Cleveland Road)	North Side	128	6	21	24	113%			14	66%	4	14	14	66%	2	2	21	99%	9	2	15	27%	13%	60%	18	78%	11%	11%
	South Side	126	6	21	25	120%			17	81%	5	13	18	86%	5	4	12	57%	1	7	11	45%	45%	9%	24	54%	17%	29%

* Single yellow line restriction apply only between 9 am to 6 pm. Vehicles are allowed to park on yellow line outside this time limit.
** This figure does not include the survey occupancy recorded at 5.00am, which is assumed to be base occupancy

Table 2 - Preston Park Triangle Beat Surveys - Saturday 14 September 2013

Road Name	Orientation	Length of available parking (m)	Parking Space required (m)	Spaces available (no.)	At 5.00			At 10.00			At 13.00			At 16.00			Total vehicles arriving between 5.00am and 4.00pm**	Vehicles Arriving			Total vehicles departing between 5.00am and 4.00pm	Vehicles Departing		
					Survey Occupancy	% Occupancy	Vehicle Movements	Survey Occupancy	% Occupancy	Vehicle Movements	Survey Occupancy	% Occupancy	Vehicle Movements	Survey Occupancy	% Occupancy	Vehicle Movements		% Arriving between 5.00 - 10.00	% Arriving between 10.00 - 13.00	% Arriving between 13.00 - 16.00		% Departing between 5.00 - 10.00	% Departing between 10.00 - 13.00	% departing between 13.00 - 16.00
Beaconsfield Villas	South Of Lucerne Road North of Lucerne Road	792.2	6	132	133	101%		126	95%	19 26	130	98%	27 23	131	99%	23 22	69	28%	39%	33%	71	37%	32%	31%
		368	6	61	46	75%		43	70%	8 11	43	70%	11 11	43	70%	11 11	30	27%	37%	37%	33	33%	33%	33%
Havelcock Road	South Of Lucerne Road North of Lucerne Road	677	6	113	106	94%		97	86%	14 23	98	87%	20 19	101	90%	19 16	53	26%	38%	36%	58	40%	33%	28%
		508	6	85	80	94%		71	84%	14 23	71	84%	26 26	70	83%	24 25	64	22%	41%	38%	74	31%	35%	34%
Waldegrave Road	South Of Lucerne Road North of Lucerne Road	570	6	95	105	111%		101	106%	21 26	101	106%	26 26	99	104%	27 29	74	28%	35%	36%	81	32%	32%	36%
		484	6	81	92	114%		82	102%	14 24	84	104%	25 23	86	107%	22 20	61	23%	41%	36%	67	36%	34%	30%
Chester Terrace	South Of Lucerne Road North of Lucerne Road	455	6	76	86	114%		78	103%	11 19	87	115%	25 16	85	112%	12 14	48	23%	52%	25%	49	39%	33%	29%
		414	6	69	78	113%		63	91%	10 25	66	96%	20 17	71	103%	22 17	52	19%	38%	42%	59	42%	29%	29%
Cleveland Road	South Of Lucerne Road North of Lucerne Road	366	6	61	63	103%		56	92%	6 13	59	97%	13 10	57	93%	9 11	28	21%	46%	32%	34	38%	29%	32%
		340	6	57	64	113%		60	106%	5 9	54	95%	9 15	57	100%	9 6	23	22%	39%	39%	30	30%	50%	20%
Southdown Avenue	East Side West Side	242	6	40	43	107%		42	104%	10 11	30	74%	7 19	39	97%	16 7	33	30%	21%	48%	37	30%	51%	19%
		260	6	43	47	108%		40	92%	6 13	39	90%	9 10	35	81%	10 14	25	24%	36%	40%	37	35%	27%	38%
Preston Drove	North side South side	628	6	105	76	73%		79	75%	16 13	66	63%	14 27	69	66%	22 19	52	31%	27%	42%	59	22%	46%	32%
		660	6	110	74	67%		74	67%	21 21	72	65%	28 30	76	69%	23 19	72	29%	39%	32%	70	30%	43%	27%
Lucerne Road (Waldegrave Road to Cleveland Road)	North Side South Side	128	6	21	26	122%		21	99%	5 10	23	108%	8 6	24	113%	7 6	20	25%	40%	35%	22	45%	27%	27%
		126	6	21	25	120%		22	105%	4 7	21	100%	4 5	23	110%	5 3	13	31%	31%	38%	15	47%	33%	20%

* Single yellow line restriction apply only between 9 am to 6 pm. Vehicles are allowed to park on yellow line outside this time limit.
** This figure does not include the survey occupancy recorded at 5.00am, which is assumed to be base occupancy

Table 3 - Weekday Parking Occupancy Difference Between 2012 and 2013

Street	Section	Spaces Available	Vehicles Parked During Each Time Period											
			2012 (Weekday)	2013 (Weekday)	2012-2013 Difference	2012 (Weekday)	2013 (Weekday)	2012-2013 Difference	2012 (Weekday)	2013 (Weekday)	2012-2013 Difference	2012 (Weekday)	2013 (Weekday)	2012-2013 Difference
			5am	5am		10am	10am		1pm	1pm		4pm	4pm	
Beaconsfield Villas														
Beaconsfield Villas (North side) *	North of Lucerne Road	96	85	-		74	79	5	69	83	14	70	73	3
Occupancy Level			89%			77%	82%	5%	72%	86%	15%	73%	76%	3%
Beaconsfield Villas (South side)	South Of Lucerne Road	132	121	136	15	128	132	4	126	136	10	123	128	5
Occupancy Level			92%	103%	11%	97%	100%	3%	95%	103%	8%	93%	97%	4%
Waldegrave Road														
Waldegrave Road (North side)	North of Lucerne Road	81	85	90	5	47	64	17	67	70	3	68	53	-15
Occupancy Level			105%	111%	6%	58%	79%	21%	83%	86%	4%	84%	65%	-19%
Waldegrave Road (South side)	South Of Lucerne Road	95	102	100	-2	79	95	16	76	84	8	80	95	15
Occupancy Level			107%	105%	-2%	83%	100%	17%	80%	88%	8%	84%	100%	16%
Cleveland Road														
Cleveland Road (North side)	North of Lucerne Road	57	59	59	0	29	40	11	28	37	9	27	36	9
Occupancy Level			104%	104%	0%	51%	70%	19%	49%	65%	16%	47%	63%	16%
Cleveland Road (South side)	South Of Lucerne Road	61	29	61	32	31	42	11	28	42	14	43	41	-2
Occupancy Level			48%	100%	52%	51%	69%	18%	46%	69%	23%	70%	67%	-3%
Edburton Road														
Edburton Road (East side)**	East Side	23	22	-		16	20	4	19	22	3	14	20	6
Occupancy Level			96%			70%	87%	17%	83%	96%	13%	61%	87%	26%
Edburton Road (West side)**	West Side	25	28	-		18	24	6	20	26	6	20	25	5
Occupancy Level			112%			72%	96%	24%	80%	104%	24%	80%	100%	20%

*2013, 5am Beaconsfield Villas North data does not include the length between property No. 14 & Preston Drove

**No data was collected for Edburton Road at 5am in 2013 as hourly beats did not include this time period

Table 4 - Weekend Parking Occupancy Difference Between 2012 and 2013

Street	Section	Spaces Available	Vehicles Parked During Each Time Period											
			2012 (Saturday)	2013 (Saturday)	2012-2013 Difference	2012 (Saturday)	2013 (Saturday)	2012-2013 Difference	2012 (Saturday)	2013 (Saturday)	2012-2013 Difference	2012 (Saturday)	2013 (Saturday)	2012-2013 Difference
			5am	5am		10am	10am		1pm	1pm		4pm	4pm	
Beaconsfield Villas														
Beaconsfield Villas (North side)*	North of Lucerne Road	96	89	-		75	83	8	79	81	2	80	84	4
Occupancy Level			93%			78%	86%	8%	82%	84%	2%	83%	88%	4%
Beaconsfield Villas (South side)	South Of Lucerne Road	132	122	133	11	115	126	11	115	130	15	124	131	7
Occupancy Level			92%	101%	8%	87%	95%	8%	87%	98%	11%	94%	99%	5%
Waldegrave Road														
Waldegrave Road (North side)	North of Lucerne Road	81	87	92	5	70	82	12	64	84	20	78	86	8
Occupancy Level			107%	114%	6%	86%	101%	15%	79%	104%	25%	96%	106%	10%
Waldegrave Road (South side)	South Of Lucerne Road	95	99	105	6	85	101	16	86	101	15	96	99	3
Occupancy Level			104%	111%	6%	89%	106%	17%	91%	106%	16%	101%	104%	3%
Cleveland Road														
Cleveland Road (North side)	North of Lucerne Road	57	55	64	9	38	60	22	33	59	26	37	57	20
Occupancy Level			96%	112%	16%	67%	105%	39%	58%	104%	46%	65%	100%	35%
Cleveland Road (South side)	South Of Lucerne Road	61	49	63	14	42	56	14	38	54	16	38	57	19
Occupancy Level			80%	103%	23%	69%	92%	23%	62%	89%	26%	62%	93%	31%
Edburton Road														
Edburton Road (East side)**	East Side	23	23	-		20	22	2	23	20	-3	19	21	2
Occupancy Level			100%			87%	96%	9%	100%	87%	-13%	83%	91%	9%
Edburton Road (West side)**	West Side	25	25	-		24	18	-6	21	18	-3	23	20	-3
Occupancy Level			100%			96%	72%	-24%	84%	72%	-12%	92%	80%	-12%

*5am Beaconsfield Villas data does not include the length between property No. 14 & Preston Drive
**No data was collected for Edburton Road at 5am in 2013 as hourly beats did not include this time period

Table 5 - Beaconsfield Villas Hourly Beats - Tuesday 17/09/2013

Beaconsfield Villas (West Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	22	22	0	3	1		3	1	3			2		9	
09.00	3	22	3	1									2		
10.00	1	21	2	1											
11.00	2	22	1	1							1				
12.00	4	22	4	2	1			1							
13.00	3	22	3	2	1										
14.00	3	19	6	1		1		1							
15.00	0	17	2												
16.00	0	17	0												
17.00	11	24	4	4	7										
18.00	3	23	4	3											
Total				18	10	1	3	3	3	0	1	2	2	9	0

Max Occupancy 19

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	22	22	21	22	22	22	19	17	17	24	23
% Occupancy	116%	116%	111%	116%	116%	116%	100%	89%	89%	126%	121%

Up to 1 hrs	35%
Between 1hr - 2 hrs	19%
Between 2hrs - 3 hrs	2%
Between 4hrs - 11hrs	44%

Beaconsfield Villas (East Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	19	19	0	3	2	1	2	1	1	1			1	7	
09.00	5	21	3	2		2		1							
10.00	3	20	4		1		1					1			
11.00	2	21	1			1				1					
12.00	5	21	5	1	2		1			1					
13.00	3	22	2			1			2						
14.00	5	21	6		1	1		3							
15.00	0	20	1												
16.00	1	18	3			1									
17.00	6	23	1	1	5										
18.00	3	23	3	3											
Total				10	11	7	4	5	3	3	0	1	1	7	0

Max Occupancy 16

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	19	21	20	21	21	22	21	20	18	23	23
% Occupancy	119%	131%	125%	131%	131%	138%	131%	125%	113%	144%	144%

Up to 1 hrs	19%
Between 1hr - 2 hrs	21%
Between 2hrs - 3 hrs	13%
Between 4hrs - 11hrs	46%

Table 6 - Preston Drove near junction with Beaconsfield Villas Hourly Beats - Tuesday 17/09/2013

Preston Drove near junction with Beaconsfield Villas (South Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	9	9	0	1	1				1	1	1			4	
09.00	2	10	1	1							1				
10.00	1	9	2		1										
11.00	2	11	0	2											
12.00	2	10	3	2											
13.00	1	9	2	1											
14.00	1	8	2			1									
15.00	0	7	1												
16.00	0	6	1												
17.00	5	9	2		5										
18.00	2	11	0	2											
Total				9	7	1	0	0	1	1	2	0	0	4	0

Max Occupancy 8

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	9	10	9	11	10	9	8	7	6	9	11
% Occupancy	113%	125%	113%	138%	125%	113%	100%	88%	75%	113%	138%

Up to 1 hrs	36%
Between 1hr - 2 hrs	28%
Between 2hrs - 3 hrs	4%
Between 4hrs - 11hrs	32%

Preston Drove near junction with Beaconsfield Villas (North Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	9	9	0	3	1	2					1		1	1	
09.00	4	10	3	1	1		1						1		
10.00	0	8	2												
11.00	2	7	3	1	1										
12.00	4	10	1	2	1		1								
13.00	5	11	4	2		1	1		1						
14.00	1	9	3	1											
15.00	2	10	1	2											
16.00	0	5	5												
17.00	6	10	1	2	4										
18.00	1	8	3	1											
Total				15	8	3	3	0	1	0	1	0	2	1	0

Max Occupancy 10

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	9	10	8	7	10	11	9	10	5	10	8
% Occupancy	90%	100%	80%	70%	100%	110%	90%	100%	50%	100%	80%

Up to 1 hrs	44%
Between 1hr - 2 hrs	24%
Between 2hrs - 3 hrs	9%
Between 4hrs - 11hrs	24%

Table 7 - Preston Drove near junction with Edburton Avenue Hourly Beats - Tuesday 17/09/2013

Preston Drove near junction with Edburton Avenue (South Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	24	24	0	6	2	1		2	1	1	1			10	
09.00	7	25	6	4			1					1	1		
10.00	6	25	6	3					1		1	1			
11.00	4	25	4	1	1	1					1				
12.00	2	26	1	2											
13.00	7	27	6	4	1			1	1						
14.00	2	23	6	2											
15.00	5	24	4	2	1	1	1								
16.00	6	26	4	2		4									
17.00	2	25	3	2											
18.00	4	23	6	4											
Total				32	5	7	2	3	3	1	3	2	1	10	0

Max Occupancy 17

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	24	25	25	25	26	27	23	24	26	25	23
% Occupancy	141%	147%	147%	147%	153%	159%	135%	141%	153%	147%	135%

Up to 1 hrs	46%
Between 1hr - 2 hrs	7%
Between 2hrs - 3 hrs	10%
Between 4hrs - 11hrs	36%

Preston Drove near junction with Edburton Avenue (North Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	26	26	0	7	1	5		1				1		11	
09.00	7	26	7	4	1		1			1					
10.00	5	26	5	2	1		2								
11.00	3	21	8	2							1				
12.00	9	27	3	6	2			1							
13.00	4	23	8	3				1							
14.00	3	19	7	2		1									
15.00	6	23	2	5			1								
16.00	7	24	6	3		4									
17.00	6	24	6	4	2										
18.00	5	24	5	5											
Total				43	7	10	4	3	0	1	1	1	0	11	0

Max Occupancy 22

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	26	26	26	21	27	23	19	23	24	24	24
% Occupancy	118%	118%	118%	95%	123%	105%	86%	105%	109%	109%	109%

Up to 1 hrs	53%
Between 1hr - 2 hrs	9%
Between 2hrs - 3 hrs	12%
Between 4hrs - 11hrs	26%

Table 8 - Lucerne Road Hourly Beats - Tuesday 17/09/2013

Lucerne Road (North Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	23	23	0	2	2	2	1	1	1	1	1		1	11	
09.00	1	22	2	1											
10.00	3	22	3	1			1					1			
11.00	2	21	3		1			1							
12.00	2	22	1		1			1							
13.00	2	22	2	1			1								
14.00	3	21	4			1		2							
15.00	0	20	1												
16.00	0	18	2												
17.00	3	18	3		3										
18.00	5	22	1	5											
Total				10	7	3	3	5	1	1	1	1	1	11	0

Max Occupancy	17
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	23	22	22	21	22	22	21	20	18	18	22
% Occupancy	135%	129%	129%	124%	129%	129%	124%	118%	106%	106%	129%

Up to 1 hrs	23%
Between 1hr - 2 hrs	16%
Between 2hrs - 3 hrs	7%
Between 4hrs - 11hrs	55%

Lucerne Road (South Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	20	20	0	2	2	1		2				1	3	9	
09.00	1	19	2							1					
10.00	4	21	2		1		1				1	1			
11.00	2	22	1	1				1							
12.00	1	21	2							1					
13.00	2	21	2	1					1						
14.00	2	21	2	1				1							
15.00	1	21	1	1											
16.00	0	18	3												
17.00	3	20	1	2	1										
18.00	9	23	6	9											
Total				17	4	1	1	4	1	2	1	2	3	9	0

Max Occupancy	15
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	20	19	21	22	21	21	21	21	18	20	23
% Occupancy	133%	127%	140%	147%	140%	140%	140%	140%	120%	133%	153%

Up to 1 hrs	38%
Between 1hr - 2 hrs	9%
Between 2hrs - 3 hrs	2%
Between 4hrs - 11hrs	51%

Table 9 - Havelock Road Hourly Beats - Tuesday 17/09/2013

Havelock Road (East side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	18	18	0	5		1	1		1			1	3	10	
09.00	6	19	5			1			1			1	3		
10.00	1	20	0		1										
11.00	0	19	1												
12.00	4	20	3	2	1					1					
13.00	2	20	2	2											
14.00	3	19	4	1			1	1							
15.00	3	20	2	1	1	1									
16.00	0	19	1												
17.00	2	20	1		2										
18.00	3	20	3	3											
Total				14	5	3	2	1	2	1	0	1	3	10	0

Max Occupancy	15
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	18	19	20	19	20	20	19	20	19	20	20
% Occupancy	120%	127%	133%	127%	133%	133%	127%	133%	127%	133%	133%

Up to 1 hrs	33%
Between 1hr - 2 hrs	12%
Between 2hrs - 3 hrs	7%
Between 4hrs - 11hrs	48%

Havelock Road (West side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	18	18	0	4	1	1	2	2	1			1	1	5	
09.00	4	18	4	2			1				1				
10.00	4	19	3			1				1	1	1			
11.00	0	18	1												
12.00	2	18	2	1		1									
13.00	6	19	5	1			3	1	1						
14.00	2	19	2				1	1							
15.00	1	19	1	1				0							
16.00	1	19	1		1										
17.00	6	19	6	1	5										
18.00	6	19	6	6											
Total				16	7	3	7	4	2	1	2	2	1	5	0

Max Occupancy	14
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	18	18	19	18	18	19	19	19	19	19	19
% Occupancy	129%	129%	136%	129%	129%	136%	136%	136%	136%	136%	136%

Up to 1 hrs	32%
Between 1hr - 2 hrs	14%
Between 2hrs - 3 hrs	6%
Between 4hrs - 11hrs	48%

Table 10 - Edburton Avenue Hourly Beats - Tuesday 17/09/2013

Edburton Avenue (East side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	22	22	0	3	1	2	1	1	1		2			11	
09.00	5	24	3	3	1					1					
10.00	0	20	4												
11.00	6	23	3	2	1						3				
12.00	4	24	3		1	2		1							
13.00	0	22	2												
14.00	3	23	2					3							
15.00	2	23	2	2											
16.00	2	20	5			2									
17.00	4	23	1	1	3										
18.00	0	22	1												
Total				11	7	6	1	5	1	1	5	0	0	11	0

Max Occupancy 19

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	22	24	20	23	24	22	23	23	20	23	22
% Occupancy	116%	126%	105%	121%	126%	116%	121%	121%	105%	121%	116%

Up to 1 hrs	23%
Between 1hr - 2 hrs	15%
Between 2hrs - 3 hrs	13%
Between 4hrs - 11hrs	50%

Edburton Avenue (West side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	26	26	0	5	3	1				2	1	1	1	12	
09.00	5	26	5	2		2					1				
10.00	3	24	5			1				1		1			
11.00	2	25	1	1							1				
12.00	4	26	3	2						2					
13.00	3	26	3	1			2								
14.00	0	25	1												
15.00	3	26	2	2			1								
16.00	2	25	3	1		1									
17.00	7	26	6	1	6										
18.00	2	26	2	2											
Total				17	9	5	3	0	0	5	3	2	1	12	0

Max Occupancy 23

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	26	26	24	25	26	26	25	26	25	26	26
% Occupancy	113%	113%	104%	109%	113%	113%	109%	113%	109%	113%	113%

Up to 1 hrs	30%
Between 1hr - 2 hrs	16%
Between 2hrs - 3 hrs	9%
Between 4hrs - 11hrs	46%

Table 11 - Beaconsfield Villas Hourly Beats - Saturday 14/09/2013

Beaconsfield Villas (West Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	23	23	0	2	2	2	2	1		1				13	
09.00	1	22	2						1						
10.00	2	22	2	2											
11.00	2	20	4	1					1						
12.00	2	19	3	1						1					
13.00	3	20	2	3											
14.00	4	21	3	1	1		1	1							
15.00	3	21	3	1	1		1								
16.00	2	21	2			2									
17.00	3	22	2		3										
18.00	1	22	1	1											
Total				12	7	4	4	2	2	2	0	0	0	13	0

Max Occupancy 19

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	23	22	22	20	19	20	21	21	21	22	22
% Occupancy	121%	116%	116%	105%	100%	105%	111%	111%	111%	116%	116%

Up to 1 hrs	26%
Between 1hr - 2 hrs	15%
Between 2hrs - 3 hrs	9%
Between 4hrs - 11hrs	50%

Beaconsfield Villas (East Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	22	22	0	1	4	1	2	1	2		1	1		9	
09.00	0	21	1												
10.00	1	18	4	1											
11.00	3	19	2	1	1						1				
12.00	4	20	3	2			2								
13.00	2	18	4						2						
14.00	6	22	2	2	2			2							
15.00	0	20	2												
16.00	5	20	5			5									
17.00	1	20	1		1										
18.00	0	20	0												
Total				7	8	6	4	3	4	0	2	1	0	9	0

Max Occupancy 16

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	22	21	18	19	20	18	22	20	20	20	20
% Occupancy	138%	131%	113%	119%	125%	113%	138%	125%	125%	125%	125%

Up to 1 hrs	16%
Between 1hr - 2 hrs	18%
Between 2hrs - 3 hrs	14%
Between 4hrs - 11hrs	52%

Table 12 - Preston Drove near junction with Beaconsfield Villas Hourly Beats - Saturday 14/09/2013

Preston Drove near junction with Beaconsfield Villas (South Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	10	10	0	4							1			5	
09.00	2	8	4	1	1										
10.00	3	10	1	2			1								
11.00	2	9	3	2											
12.00	4	11	2	2			1			1					
13.00	3	12	2	2					1	0					
14.00	1	10	3	1											
15.00	2	11	1	2											
16.00	4	11	4	4											
17.00	4	11	4	3	1										
18.00	2	10	3	2											
Total				25	2	0	2	0	1	1	1	0	0	5	0

Max Occupancy 8

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	10	8	10	9	11	12	10	11	11	11	10
% Occupancy	125%	100%	125%	113%	138%	150%	125%	138%	138%	138%	125%

Up to 1 hrs	68%
Between 1hr - 2 hrs	5%
Between 2hrs - 3 hrs	0%
Between 4hrs - 11hrs	27%

Preston Drove near junction with Beaconsfield Villas (North Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	11	11	0	2		1	1	1					1	5	
09.00	2	11	2		1		1								
10.00	0	11	0												
11.00	1	10	2								1				
12.00	1	10	1	1											
13.00	5	12	3	4	1										
14.00	2	10	4	2											
15.00	4	11	3	3	1										
16.00	3	11	3	1	1	1									
17.00	4	13	2	2	2										
18.00	3	12	4	3											
Total				18	6	2	2	1	0	0	1	0	1	5	0

Max Occupancy 10

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	11	11	11	10	10	12	10	11	11	13	12
% Occupancy	110%	110%	110%	100%	100%	120%	100%	110%	110%	130%	120%

Up to 1 hrs	50%
Between 1hr - 2 hrs	17%
Between 2hrs - 3 hrs	6%
Between 4hrs - 11hrs	28%

Table 13 - Preston Drove near junction with Edburton Avenue Hourly Beats - Saturday 14/09/2013

Preston Drove near junction with Edburton Avenue (South Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	22	22	0	2	4	1	3	2	1					9	
09.00	6	26	2	6											
10.00	8	24	10	4	2		1					1			
11.00	7	26	5	6	1										
12.00	5	20	11	2	2		1								
13.00	4	19	5	3					1						
14.00	5	17	7	3				2							
15.00	6	20	3	3			3								
16.00	5	21	4	3		2									
17.00	3	21	3	1	2										
18.00	2	22	1	2											
Total				35	11	3	8	4	2	0	0	1	0	9	0

Max Occupancy 17

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	22	26	24	26	20	19	17	20	21	21	22
% Occupancy	129%	153%	141%	153%	118%	112%	100%	118%	124%	124%	129%

Up to 1 hrs	48%
Between 1hr - 2 hrs	15%
Between 2hrs - 3 hrs	4%
Between 4hrs - 11hrs	33%

Preston Drove near junction with Edburton Avenue (North Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	26	26	0	3	1	4	3	1	1		2			11	
09.00	3	26	3	1	1	1									
10.00	3	27	2	3											
11.00	6	25	8	4	2										
12.00	4	21	8	3						1					
13.00	7	22	6	2	2	1		1	1						
14.00	6	25	3	2			1	3							
15.00	3	24	4	2			1								
16.00	3	22	5	2		1									
17.00	5	25	2		5										
18.00	3	26	2	3											
Total				25	11	7	5	5	2	1	2	0	0	11	0

Max Occupancy 22

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	26	26	27	25	21	22	25	24	22	25	26
% Occupancy	118%	118%	123%	114%	95%	100%	114%	109%	100%	114%	118%

Up to 1 hrs	36%
Between 1hr - 2 hrs	16%
Between 2hrs - 3 hrs	10%
Between 4hrs - 11hrs	38%

Table 14 - Lucerne Road Hourly Beats - Saturday 14/09/2013

Lucerne Road (North Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	23	23	0	3	1	3	1	1	2			1		11	
09.00	2	22	3										2	0	
10.00	2	23	1	1								1			
11.00	2	21	4	2											
12.00	3	21	3	3											
13.00	5	22	4	1	3				1						
14.00	4	23	3			1		3							
15.00	3	23	3	1	1		1								
16.00	1	23	1			1									
17.00	3	23	3		3										
18.00	0	23	0												
Total				11	8	5	2	4	3	0	0	2	2	11	0

Max Occupancy	17
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	23	22	23	21	21	22	23	23	23	23	23
% Occupancy	135%	129%	135%	124%	124%	129%	135%	135%	135%	135%	135%

Up to 1 hrs	23%
Between 1hr - 2 hrs	17%
Between 2hrs - 3 hrs	10%
Between 4hrs - 11hrs	50%

Lucerne Road (South Side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	22	22	0	4	1			1	1	2			2	11	
09.00	3	21	4	2									1		
10.00	2	20	3			1						1			
11.00	0	20	0												
12.00	2	22	0	1					1						
13.00	2	21	3	1					1						
14.00	2	21	2	2											
15.00	3	20	4	1	1		1								
16.00	1	20	1			1									
17.00	2	21	1		2										
18.00	3	21	3	3											
Total				14	4	2	1	1	3	2	0	1	3	11	0

Max Occupancy	15
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	22	21	20	20	22	21	21	20	20	21	21
% Occupancy	147%	140%	133%	133%	147%	140%	140%	133%	133%	140%	140%

Up to 1 hrs	33%
Between 1hr - 2 hrs	10%
Between 2hrs - 3 hrs	5%
Between 4hrs - 11hrs	52%

Table 15 - Havelock Road Hourly Beats - Saturday 14/09/2013

Havelock Road (East side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	19	19	0	2	1	4	1		2		1	1		7	
09.00	0	17	2												
10.00	1	17	1	1											
11.00	5	17	5			1	2				2				
12.00	2	18	1	1	1										
13.00	1	18	1						1						
14.00	4	18	4		1			3							
15.00	2	18	2	1			1								
16.00	2	17	3		1	1									
17.00	2	18	1	1	1										
18.00	2	18	2	2											
Total				8	5	6	4	3	3	0	3	1	0	7	0

Max Occupancy 15

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	19	17	17	17	18	18	18	18	17	18	18
% Occupancy	127%	113%	113%	113%	120%	120%	120%	120%	113%	120%	120%

Up to 1 hrs	20%
Between 1hr - 2 hrs	13%
Between 2hrs - 3 hrs	15%
Between 4hrs - 11hrs	53%

Havelock Road (West side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	18	18	0	3	1	1	2	2	2					7	
09.00	2	17	3		1								1		
10.00	1	17	1				1								
11.00	1	16	2	1											
12.00	5	18	3	1	2				1	1					
13.00	2	17	3		1				1						
14.00	5	17	5	2			1	2							
15.00	5	19	3	1			4								
16.00	1	19	1	1											
17.00	0	18	1												
18.00	3	19	2	3											
Total				12	5	1	8	4	4	1	0	0	1	7	0

Max Occupancy 14

Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	18	17	17	16	18	17	17	19	19	18	19
% Occupancy	129%	121%	121%	114%	129%	121%	121%	136%	136%	129%	136%

Up to 1 hrs	28%
Between 1hr - 2 hrs	12%
Between 2hrs - 3 hrs	2%
Between 4hrs - 11hrs	58%

Table 16 - Edburton Avenue Hourly Beats - Saturday 14/09/2013

Edburton Avenue (East side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	24	24	0	2		2	3		3	1	1		1	11	
09.00	1	23	2					1							
10.00	0	23	0												
11.00	4	25	2	1	2		1								
12.00	2	23	4							2					
13.00	1	22	2	1											
14.00	6	23	5				1	5							
15.00	2	23	2			1	1								
16.00	1	23	1			1									
17.00	0	23	0												
18.00	2	22	3	2											
Total				6	2	4	6	6	3	3	1	0	1	11	0

Max Occupancy	19
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	24	23	23	25	23	22	23	23	23	23	22
% Occupancy	126%	121%	121%	132%	121%	116%	121%	121%	121%	121%	116%

Up to 1 hrs	14%
Between 1hr - 2 hrs	5%
Between 2hrs - 3 hrs	9%
Between 4hrs - 11hrs	72%

Edburton Avenue (West side)

Time	In	Occupancy	Departures	Duration of Stay (hours)											
				01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	>11:00
08.00	27	27	0	4	4	6	1	1		1				10	
09.00	4	27	4	2						1		1			
10.00	3	24	6	1	1					1					
11.00	8	25	7	4	2	1					1				
12.00	7	26	6	4				1		2					
13.00	5	24	7		3				2						
14.00	4	27	1	2	1			1							
15.00	6	27	6	2		1	3								
16.00	2	25	4	1		1									
17.00	3	25	3	1	2										
18.00	2	24	3	2											
Total				23	13	9	4	3	2	5	1	1	0	10	0

Max Occupancy	23
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Survey Period											
Time	08.00	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00
Occupancy	27	27	24	25	26	24	27	27	25	25	24
% Occupancy	117%	117%	104%	109%	113%	104%	117%	117%	109%	109%	104%

Up to 1 hrs	32%
Between 1hr - 2 hrs	18%
Between 2hrs - 3 hrs	13%
Between 4hrs - 11hrs	37%

Table 17 - Spaces Occupied in Preston Park Triangle Area

	Saturday 14/09/2013				Tuesday 17/09/2013			
	05:00	10:00	13:00	16:00	05:00	10:00	13:00	16:00
Max Occupancy	1169	1169	1169	1169	1169	1169	1169	1169
Total Occupancy	1144	1055	1044	1066	1109	940	918	906
Total In	-	184	272	261	-	306	155	200
Total Out	-	274	283	239	-	479	180	211
Total Spare Occupancy	25	114	125	103	60	229	251	263
% Occupancy	98%	90%	89%	91%	95%	80%	79%	78%

Subject:		Norton Road Car Park Tariff	
Date of Meeting:		4th March 2014	
Report of:		Executive Director of Environment, Development & Housing	
Contact Officer:	Name:	Austen Hunter	Tel: 29-2245
	Email:	austen.hunter@brighton-hove.gov.uk	
Ward(s) affected:		Central Hove	

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 Norton Road Car Park is a multi-storey facility located in the centre of Hove's main business district, opposite Hove Town Hall. It was built in the 1960s and has a capacity of 290 parking spaces. The major operating costs are for maintenance to the concrete structure in a marine environment; lighting, enforcement of the Pay & Display system; maintenance of the payment machines, CCTV and cleaning.
- 1.2 On 5th December 2013 P&R Committee decided "that a report be brought back to the next meeting of the Environment, Transport & Sustainability Committee setting out options for a reduction to half the weekly rate for Sunday parking charges at Hove's Norton Road car park."
- 1.3 The current tariff structure at Norton Road is the same, seven days a week. At other city centre car parks weekend tariffs are higher to reflect higher demand. Norton Road primarily serves Hove Town Hall and it is therefore busiest from Monday to Friday.

2. RECOMMENDATIONS:

- 2.1 That the Committee authorise a 6-month trial of free parking at weekends for hotel guests at Norton Road Car Park (Option 2)

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 In general, parking charges can benefit businesses by encouraging turnover of spaces, which helps to increase footfall and spend. Charging can also help to reduce congestion making it easier for people to access businesses and reduce pollution, making the city a more attractive place.
- 3.2 Occupancy levels at Norton Road car park are lower at the weekend with the lowest occupancy on Sundays.

- 3.3 The small change required to pay for 2 hours and 9 hours at the 50% reduced rate is likely to cause frustration to customers and so a more practical approach would be to offer rounded rates.

Option 1 – 50% reduction, rounded

	Current tariff	50% reduction	Option 1 - 50% rounded
1 hour	£1.00	£0.50	£0.50
2 hours	£1.50	£0.75	£1.00
4 hours	£3.00	£1.50	£1.50
5 hours	£4.00	£2.00	£2.00
9 hours	£4.50	£2.25	delete
12 hours (all day)	£5.00	£2.50	£2.50

- 3.4 Due to the age of the pay machines at Norton Road Car Park it is not possible to amend costs as easily as it is with more modern machines. The cost of making this change would be £600.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 It is not considered likely that a 50% reduction would have any significant impact on demand because tariffs are already relatively low and there is free parking available near Norton Road Car Park at Tesco. During the free parking days in December 2013 there was no significant change in use. For these reasons, Option 1 is not recommended.

Option 2 – Free weekend parking for hotel guests

- 4.2 Demand for lower cost parking from hotel guests is a common request received by Parking Services. Norton Road Car Park is well served by regular buses and introducing free parking for hotel guests would create an attractive option for guests and could reduce congestion in more central areas.
- 4.3 The likely take-up and impacts of this option are not known, therefore this option is recommended on a trial basis of 6 months initially.

Option 3 – Free weekend parking after 3pm

- 4.4 It is not considered likely that this option would have any significant impact on demand for the same reasons given at 4.1.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The options considered in this report were discussed with ward councillors.
- 5.2 69 hotels and guest houses across the city were consulted on Option 2. 13 responses were received with 85% (11) in favour.

6. CONCLUSION

- 6.1 Tariffs are already relatively low at Norton Road Car Park, there is free parking available nearby and the impact upon use of reducing tariffs by 50% on Sunday or creating free parking after 3pm at weekends is expected to be negligible.
- 6.2 There is a one-off cost of £600 to change pay machines as well as costs involved with changing the Traffic Regulation Order.
- 6.3 The introduction of free parking for hotel guests (Option 2) is recommended on a trial basis for 6 months to assess possible benefits and impacts.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The annual income generated from Norton Road Car Park is approximately £230,000. Option 1 is estimated to result in a loss of income of approximately £4,000 each year and a one off cost of £600. This does not include any allowance for advertising or making Traffic Regulation Order (TRO's) to implement the proposed amendment.

Finance Officer Consulted: Steven Bedford

Date: 19/12/2013

Legal Implications:

- 7.2 The Council has power under section 35C of the Road Traffic Regulation Act 1984 to vary the charges payable at off-street car parks by way of a notice. Procedure regulations set out the process that must be followed. A notice must be published in a newspaper circulating in the area and displayed in the affected car parks at least 21 days before the changes take effect.

Lawyer Consulted:

Carl Hearsum

Date: 19/12/2013

Equalities Implications:

- 7.3 None

Sustainability Implications:

- 7.4 None

Any Other Significant Implications:

- 7.5 None

SUPPORTING DOCUMENTATION

Appendices:

None

Documents in Members' Rooms

None

Background Documents

Policy & Resources Committee 5th December 2013, Agenda Item 79

[http://present.brighton-hove.gov.uk/Published/C00000689/M00004687/\\$\\$\\$Decisions.doc.pdf](http://present.brighton-hove.gov.uk/Published/C00000689/M00004687/$$$Decisions.doc.pdf)

Subject:	Band of Interest affecting properties in Cheapside		
Date of Meeting:	4 March 2014		
Report of:	Executive Director – Environment, Development & Housing		
Contact Officer:	Name:	Andrew Renaut	Tel: 29-2477
	Email:	andrew.renaut@brighton-hove.gov.uk	
Ward(s) affected:	St Peter’s & North Laine Ward		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 A Band of Interest enables an area of land to be protected in order that the best alignment for a route can be determined prior to pursuing any necessary land acquisition. Approved highway schemes are recorded on the highway terrier and on the local land charges register. In such circumstances, there is a possibility that the council may be served a blight notice by an affected property owner, and if proved to be valid, the council would incur costs in acquiring the property.
- 1.2 An area of land that forms part of an historic Band of Interest was approved many years ago to accommodate a planned road widening scheme, the Preston Circus Western Relief Road, which was to link London Road to New England Road. The extent of this Band of Interest is shown on the Plan attached as Appendix 1 and includes a number of properties in Cheapside, between London Road and the New England Quarter. It is not considered necessary to retain the Band of Interest, and property within it, for highway purposes and therefore the Committee is requested to consider if the approved Band of Interest can be rescinded.

2. RECOMMENDATIONS:

- 2.1 That the Committee agrees that the Band of Interest delineated on the plan attached as Appendix 1 be rescinded; and
- 2.2 That the Committee requests that the Executive Director notifies the owners of the affected properties of the rescission decision and ensures that council records are amended accordingly.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 A number of areas of land/properties on either side of Cheapside were identified as being required to accommodate the design of the southern approach to a proposed scheme called the 'Preston Circus Western Relief Road'. These properties included "The Hobgoblin" public house, part of the then Brighton College of Technology (now City College) and 43-45 Cheapside. A Band of Interest was approved by East Sussex County Council's Highways &

Transportation Committee in June 1994 and was inherited by the city council in 1997. This is the Band of Interest shown in Appendix 1.

- 3.2 Although the Relief Road proposal was subsequently rescinded, the Band of Interest for Cheapside was retained in order to enable the delivery of what was known as Stage 3 of the London Road Bus Priority & Traffic Management Scheme. This proposal was initially approved in June 1993 and was a further, planned stage of the successful traffic management scheme designed to help regenerate the London Road shopping corridor and improve bus passenger journey times. This included the introduction of priority lanes for buses, taxis and cyclists in the London Road/St Peter's Church area in the 1990s. Stage 3 was designed to enable all northbound A23 traffic, other than buses, taxis and cyclists to be routed along Cheapside and the then New England Street to New England Road.
- 3.3 Although the principles of the Stage 3 scheme design have not been pursued, nor has the design been formally withdrawn. However, significant development has since occurred in the New England Quarter area and the alignment of part of the road through the area, now known as Fleet Street, was significantly altered.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The alternative to not rescinding the Band of Interest for this historic scheme would be to retain the properties involved and continue to blight their potential sale or development.
- 4.2 Any future proposal to route additional movement/traffic along Cheapside would need to be tested based on current information and design guidance and, as such, would either do so within the existing Highway boundary or by re-establishing a Band of Interest for an associated road and footway widening.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 There has been no local consultation on the proposed rescission of this historic scheme. However, the council has been approached by a local developer and a representative of one of the occupants of 43-45 Cheapside regarding the existence and implication of the declared Band of Interest.

6. CONCLUSION

- 6.1 The proposed recommendation will remove the possibility of any potential blight on the properties included with the Band of Interest. In addition, the council will no longer need to declare the Band of Interest for the proposed scheme when responding to local land charge searches. The rescission of the Band of Interest will not preclude any such similar scheme being reintroduced in the future should it be considered necessary.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The costs of this relate to officer time which will be met from within existing revenue budgets.

Finance Officer Consulted: Jeff Coates

Date:04/02/2014

Legal Implications:

- 7.2 The statutory provisions regarding “planning blight” are set out in Chapter II of the Town and Country Planning Act 1990 and are summarised in paragraph 1.1 of this report. As stated in the report, highway schemes will be registered in the Local Land Charges Register maintained by the Council thereby serving as notice to prospective purchasers of properties affected.

Lawyer Consulted: Hilary Woodward Date:10 February 2014

Equalities Implications:

- 7.3 There are no equalities implications associated with the proposed rescission of the Band of Interest and therefore no Equalities Impact Assessment has been undertaken.

Sustainability Implications:

- 7.4 There are no sustainability implications associated with the proposed rescission of the Band of Interest.

Any Other Significant Implications:

- 7.5 There are no other significant implications associated with the proposed rescission of the Band of Interest

SUPPORTING DOCUMENTATION

Appendices:

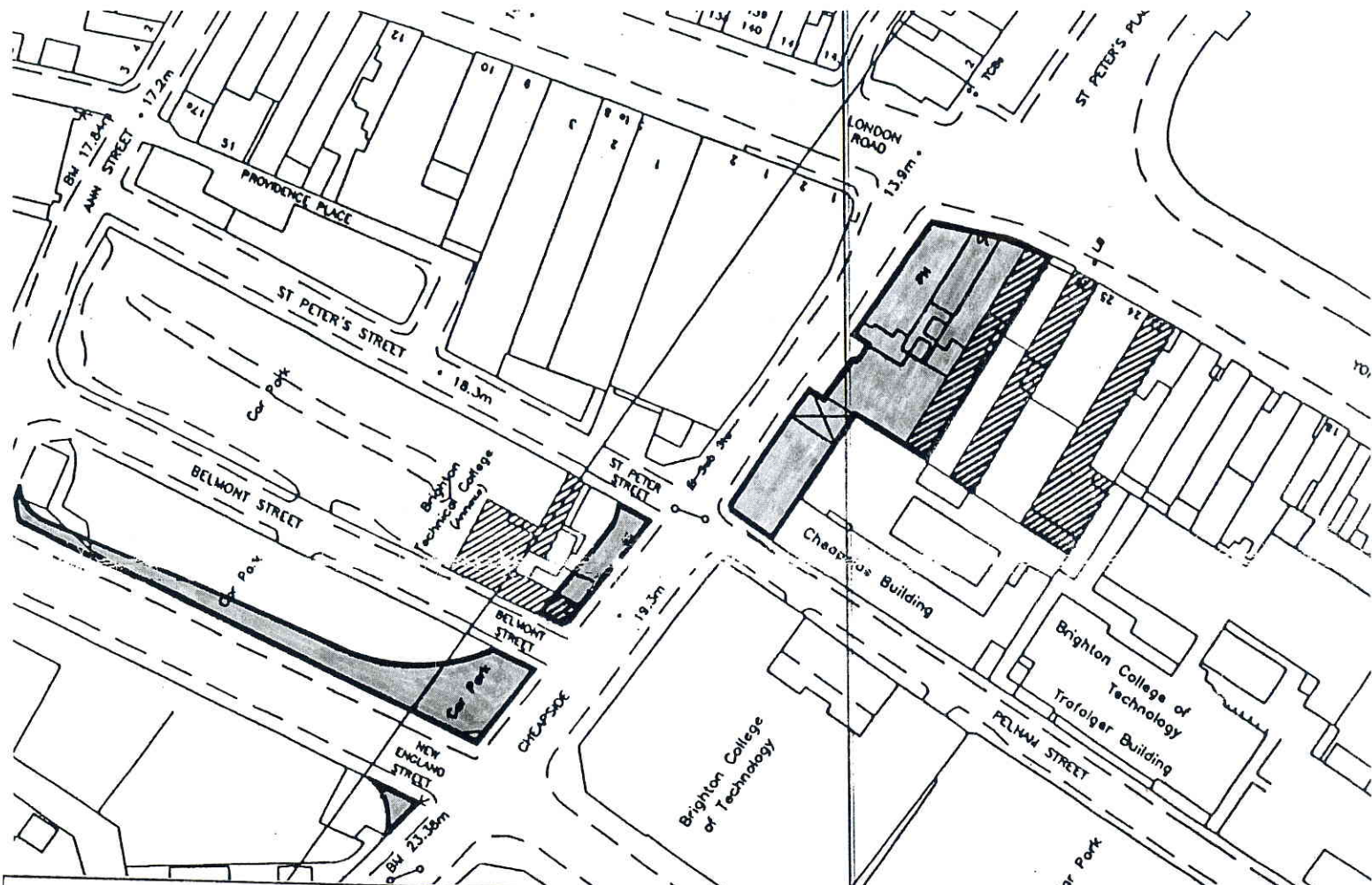
1. Plan showing Band of Interest

Documents in Members’ Rooms

None.

Background Documents

1. Plans of highway proposals in London Road area and Band of Interest



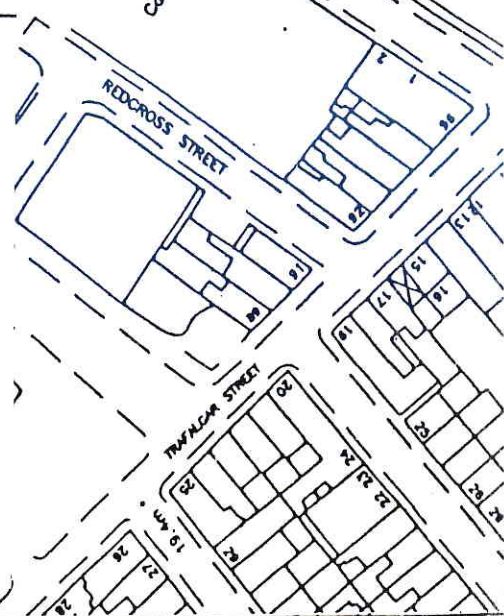
BAND OF INTEREST



**PROPERTIES IN THE OWNERSHIP OF
EAST SUSSEX COUNTY COUNCIL**



**PROPERTIES IN THE OWNERSHIP OF
EAST SUSSEX COUNTY COUNCIL
SURPLUS TO HIGHWAY REQUIREMENTS**



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1st Issue	Signed	Date	BRIGHTON STATION AREA TRAFFIC AND ENVIRONMENTAL MANAGEMENT STUDY BAND OF INTEREST	LLC/HW/BRIGHTON/6
Prepared	<i>A. Hook</i>	27/4/94		
Designed	<i>P. Osborne</i>	27/4/94		
Checked	<i>P. Osborne</i>	18/5/94		
Approved	<i>A. Billings</i>	18/5/94		
Scale: 1:1250			Drg No: LD0491/19/2	

