





Brighton & Hove
City Council

Environment, Transport & Sustainability Committee

Title:	Environment, Transport & Sustainability Committee
Date:	20 March 2018
Time:	4.00pm
Venue	Council Chamber, Hove Town Hall
Members:	Councillors: Mitchell (Chair), Horan (Deputy Chair), Wares (Opposition Spokesperson), Littman (Group Spokesperson), Atkinson, Brown, Nemeth, Peltzer Dunn, Robins and West
Contact:	John Peel Democratic Services Officer 01273 291058 john.peel@brighton-hove.gov.uk
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Democratic Services: Environment, Transport & Sustainability Committee

Lawyer	Executive Director	Councillor Mitchell <i>Chair</i>	Democratic Services Officer
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OFFICERS

Councillor Horan <i>Deputy Chair</i>
Councillor Robins
Councillor Atkinson

Councillor Brown
Councillor Nemeth
Councillor Peltzer Dunn
Councillor Wares <i>Opposition Spokesperson</i>
Councillor Littman <i>Group Spokesperson</i>
Councillor West

OFFICERS

Public Speaker	Public Speaker
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Press

Public Seating



Public Seating



AGENDA

PART ONE

Page

PROCEDURAL MATTERS

56 PROCEDURAL BUSINESS

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

In each case, you need to declare

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

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

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

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

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

57 MINUTES

1 - 16

To consider the minutes of the meeting held on 23 January 2018.

Contact Officer: John Peel

Tel: 01273 291058

58 CHAIRS COMMUNICATIONS

59 CALL OVER

- (a) Items 63 – 71 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.

60 PUBLIC INVOLVEMENT

17 - 22

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

- (a) **Petitions:** To receive any petitions presented by members of the public;
 - (i) Henley Road Taxi Rank
 - (ii) Friar Road area parking consultation
- (b) **Written Questions:** To receive any questions submitted by the due date of 12 noon on the 14 March 2018;
- (c) **Deputations:** To receive any deputations submitted by the due date of 12 noon on the 14 March 2018.
 - (i) Consultation on a Controlled Parking Zone in the Surrenden Area

61 ITEMS REFERRED FROM COUNCIL

23 - 26

Items referred from the meeting of Full Council held on 1 February 2018:

- (d) **Deputations**
 - (i) Night Buses, Brighton and Hove

62 MEMBER INVOLVEMENT

27 - 40

To consider the following matters raised by Members:

- (a) **Petitions:** To receive any petitions;
 - (i) Traffic Calming measures on Vale Road- Councillors C Theobald, G Theobald and Wares
- (b) **Written Questions:** To consider any written questions;
 - (i) Parking Enforcement procedures- Councillor Nemeth
- (c) **Letters:** To consider any letters;
 - (i) Verge posts- Councillors Janio and Wares
 - (ii) Road Safety Measures for Mile Oak Road- Councillor Atkinson
 - (iii) Parking in the Surrenden Road area- Councillors A Norman, K Norman and Taylor
- (d) **Notices of Motion:** to consider any Notices of Motion referred from Full Council or submitted directly to the Committee.
 - (i) Clean Air Day

ENVIRONMENT & SUSTAINABILITY MATTERS

63 OFFICIAL FEED AND FOOD CONTROLS SERVICE PLAN 2018/19

41 - 66

Report of the Executive Director, Neighbourhoods, Communities & Housing

Contact Officer: Nick Wilmot

Tel: 01273 292 157

Ward Affected: All Wards

64 HEALTH AND SAFETY SERVICE PLAN

67 - 74

Report of the Executive Director, Neighbourhoods, Communities & Housing

Contact Officer: Nick Wilmot

Tel: 01273 292 157

Ward Affected: All Wards

65 MANAGEMENT OF HOVE PARK 3G FOOTBALL FACILITY

75 - 110

Report of the Executive Director, Economy, Environment & Culture

Contact Officer: Robert Walker

Tel: 01273 294349

Ward Affected: Hove Park

TRANSPORT & PUBLIC REALM MATTERS

- 66 2018/19 LOCAL TRANSPORT PLAN CAPITAL PROGRAMME 111 - 126**
- Report of the Executive Director, Economy, Environment & Culture
- Contact Officer: Andrew Renaut Tel: 01273 292477*
- Ward Affected: All Wards*
-
- 67 AIR QUALITY PROGRAMME UPDATE 127 - 150**
- Report of the Executive Director, Economy, Environment & Culture
- Contact Officer: Mark Prior Tel: 01273 292095*
- Ward Affected: All Wards*
-
- 68 RESPONSE TO GOVERNMENT CONSULTATION ON MAJOR ROAD NETWORK 151 - 174**
- Report of the Executive Director, Economy, Environment & Culture
- Contact Officer: Andrew Renaut Tel: 01273 292477*
- Ward Affected: All Wards*
-
- 69 BLUE BADGE TRAFFIC ORDERS 175 - 196**
- Report of the Executive Director, Economy, Environment & Culture
- Contact Officer: Charles Field Tel: 01273 293329*
- Ward Affected: East Brighton; Hanover & Elm Grove; Preston Park; Queen's Park; Regency*
-
- 70 SCHOOL PARKING ENFORCEMENT 197 - 208**
- Report of the Executive Director, Economy, Environment & Culture
- Contact Officer: Paul Nicholls Tel: 01273 293287*
- Ward Affected: All Wards*
-
- 71 CENTRAL HOVE AND PORTSLADE PROPERTY LEVEL PROTECTION SCHEME - PERMISSION TO PROCURE 209 - 228**
- Report of the Executive Director, Economy, Environment & Culture
- Contact Officer: Maggie Moran Tel: 01273 292239*
- Ward Affected: All Wards*

72 ITEMS REFERRED FOR FULL COUNCIL

To consider items to be submitted to the 19 April 2018 Council meeting for information.

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

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

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Date of Publication - Monday, 12 March 2018

BRIGHTON & HOVE CITY COUNCIL
ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE

4.00pm 23 JANUARY 2018

COUNCIL CHAMBER, HOVE TOWN HALL

MINUTES

Present: Councillor Mitchell (Chair) Horan (Deputy Chair), Wares (Opposition Spokesperson), Littman (Group Spokesperson), Atkinson, Brown, Nemeth, Peltzer Dunn, Robins and West

PART ONE

44 PROCEDURAL BUSINESS

44(a) Declarations of substitutes

44.1 There were none.

44(b) Declarations of interest

44.2 Councillor West declared a non-pecuniary interest in Item 54: Rights of Way Improvement Plan as the Chair of the Brighton & Hove Way Association.

44.3 Councillor Nemeth declared a non-pecuniary interest in Item 51: Fees & Charges 2018/19 as his partner was a current allotment holder.

44.4 Councillor Robins declared a non-pecuniary interest in Item 51: Fees & Charges 2018/19 as a current allotment holder.

44(c) Exclusion of press and public

44.5 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(l) of the Act).

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

45 MINUTES

- 45.1 **RESOLVED-** That the minutes of the previous meeting held on 28 November 2017 be approved and signed as the correct record.

46 CHAIRS COMMUNICATIONS

- 46.1 The Chair provided the following communications:

"I would like to take this opportunity to congratulate OurBike, for winning an Argus Community Star Award for the Brighton BikeShare Scheme that is now one of the best used in the country".

47 CALL OVER

- 47.1 All items on the agenda were reserved for discussion.

48 PUBLIC INVOLVEMENT

(A) PETITIONS

(i) Close Wolstonbury Road off to traffic

- 48.1 The Committee considered a petition signed by 184 people requesting the council permanently close Wolstonbury Road off to traffic to prevent the road being used as a cut-through, to disperse parking by non-residents and to improve safety.

- 48.2 The Chair provided the following response:

"Thank you for coming today to present your petition and for the information that you have sent by email.

As you may know, I met with one of your ward councillors last week, Councillor O'Quinn, along with the council's Head of Traffic Management to look at the background to the problems you describe and to get an understanding of them. We discussed the problems of HGVs and other traffic taking circuitous routes through the area so as to double-back for deliveries to stores in Dyke Road and the issue of college staff parking and speeding traffic.

Any major change such as a road closure would have to be considered very, very carefully, particularly in relation to the impact of displaced traffic to nearby streets and there would need to be full consultation across the wider area.

Officers are looking into the situation and will make contact with the local stores in relation to the route that their delivery drivers are taking. We will also review the operation of the traffic signals at the BHASVIC junction to ensure their operation is optimised.

Alongside this, the issue of allocations of permit to schools and colleges is being looked at as part of the parking permit review that is due to start shortly.

We are also looking at some areas of the city where further measures may be needed to support the 20mph speed limit, although this budget is very limited. I will ask officers to look into the reported problems in Highdown Road in particular, in relation to speeding. We will keep in touch with you via your ward councillors as this work progresses".

- 48.3 Councillor Littman asked for clarification that the proposal was to note the petition.

48.4 The Chair clarified that research was being undertaken to consider the immediate short-term problems. A permanent closure would require a wide-ranging consultation and for funding to be identified. Therefore, the proposal at this stage was to note the petition with updates circulated as required and further communication with residents via the ward councillors.

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

(b) Written Questions

(i) West Hove Parking Scheme

48.6 Claire Sheriff put the following question:

“Why was the second consultation for the West Hove (Area L) worded as a Mon-Sun scheme rather than Mon-Fri (as the latter was voted for by the majority of residents - 53%)?”

48.7 The Chair provided the following reply:

“Thank you for your question regarding the West Hove parking scheme which is currently being implemented.

The initial consultation was for approval for a further detailed design and the extent of the area which included various options for hours and days of operation.

The further consultation was undertaken to receive comments on the detailed design including suggested days of operation.

The reasoning for the days of operation (Monday to Sunday) was outlined in a report to this committee in March 2017. The officer recommendation was for a seven day scheme as it was felt that if a five day scheme was introduced it would lead to vehicle displacement at weekends particularly as other schemes nearby are all seven day schemes. Already in the new light touch Hanover parking scheme that operates Monday to Friday we are hearing from some residents about the difficulties parking at weekends due to no restrictions being in place so officer are quite alive to this possibility.

Although the West Hove respondents were originally slightly in favour of a Monday to Friday parking scheme they did have another opportunity to comment on this proposal when the detailed design consultation period was carried out, so they had another chance to think about the days of operation. And following that, the legal Traffic Order was advertised.

In the further consultation 75% of respondents supported the idea of a 7 days residents parking scheme. During the legal Traffic Order consultation period only one comment was received that a five day scheme would be preferred to a seven day scheme. This was reported back to this Committee on the 27th June and 10th October last year where it was agreed to proceed with the parking scheme as a seven day scheme”.

48.8 Claire Sheriff put the following supplementary question:

“We don't believe there will be a problem with vehicle displacement at the weekends, it's a quiet area where we live, particularly at weekends with people not parking here to

commute to Portslade station. Why can't we have a light touch Mon-Fri scheme such as the one proposed for the Hove Park area?"

48.9 The Chair provided the following reply:

"At each stage of the process, the results of the consultation came back to committee and we went out to reconsult on detailed designs and residents didn't have anything taken away, they had a further chance to comment, in terms of the operation of days of the week that they wanted the scheme to cover. This final decision was based on the results that came back to us. I think the best thing to do now is get the agreed scheme up and running and if there are any significant problems with its operation in any area of the scheme, then these can be looked at"

(ii) Controlled Parking Zone S

48.10 The question was withdrawn.

(d) Deputations

(i) Proposed 3G at Hove Park

48.11 The Committee considered a deputation outlining the benefits of the proposed 3G at Hove Park.

48.12 The Chair provided the following response:

"It is really good to receive your views highlighting the positive side of the Councils decision to replace the worn out astro-turf surface with a 3G surface and to look through the range of groups that you think will be interested in using the facility. We also believe that there will be a good demand for the facility and look forward to liaising with Hove Park Colts over the details of future use. A contractor has now been appointed and it is hoped work will start on site in early February"

48.13 **RESOLVED-** That the deputation be noted.

49 ITEMS REFERRED FROM COUNCIL

(A) PETITIONS

(i) Pedestrian Crossing on the junction of Colebrook Road and Tongdean Lane

49.1 The Committee considered a petition referred from the meeting of Full Council held on 14 December 2017 and signed by 214 people requesting a pedestrian crossing on the junction of Colebrook Road and Tongdean Lane.

49.2 The Chair provided the following response:

"As part of the Councils Pedestrian Crossing Request Policy all requests undergo an assessment to assist in prioritising limited funding to those locations most in need. This

assessment considers a number of categories known to affect people's ability to cross the public highway; such as road width, number of vehicles and pedestrians using the road. The assessment also considers any previous related accidents and if the requested crossing point could improve access to services such as buses and GP surgeries.

Sites are usually assessed in batches, once annually; the results of the assessment are then presented to the appropriate Environment Transport & Sustainability Committee. As part of this process there have been a number of pedestrian crossings identified and installed across the city. As a result of requests from residents the Transport Projects team has recently carried out assessments on 3 separate locations on Tongdean Lane; near Eldred Avenue, Withdean Road, and by the railway bridge. The results of these assessments are currently being evaluated.

Officers now have your request and will be happy to include a site assessment on Tongdean Lane near Colebrook Road in the next assessment phase so that it might be considered for a crossing point using the approved methodology for assessing Pedestrian crossing points".

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

(ii) Pedestrian Crossing at Weald Avenue on the Old Shoreham Road

49.4 The Committee considered a petition referred from the meeting of Full Council held on 14 December 2017 and signed by 439 people requesting a pedestrian crossing point on Old Shoreham Road in the vicinity of the Weald Avenue/Lullington Avenue junction.

49.5 The Chair provided the following response:

"This area of Old Shoreham Road also falls within the Access Fund project boundary and as a result the School Travel Team is working with a number of schools in the area to help better understand the journey to school by looking at the barriers faced with the journeys to school and to promote road safety and active travel. The team are actively engaged with schools including; Blatchington Mill Secondary School, Hove Park Lower Secondary School, Aldrington Primary School, West Hove Infant School and Hove Junior School. Work to assist and promote safe and active travel is also being carried out with four nurseries in this area, either side of Old Shoreham Road.

In accordance with the Council's Policy on Pedestrian Crossings, officers will include this request on the list for formal assessment using the Pedestrian Crossing Assessment Methodology. As part of this methodology all crossing requests undergo an assessment to assist in prioritising limited funding to those locations most in need. This assessment considers a number of categories known to affect ones' ability to cross the public highway; such as road width, number of vehicles and pedestrians using the road. The assessment also considers any previous related accidents and if the requested crossing point could improve access to services such as buses and GP surgeries or if it might improve the safety on walking routes to schools.

Initial investigations were carried out at this location as part of the Safer Routes to Schools programme, as part of these investigations officers noted issues with limited space available for a crossing facility particularly due to access requirements for private driveways. These investigations however identified potential opportunities to install a light controlled crossing facility at the signals on Old Shoreham Road and St Joseph's Close junction.

Work is being undertaken to fully understand the potential costs and the available budgets for this”.

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

(D) DEPUTATIONS

(i) Hove Park Tennis Courts

49.7 The Committee considered a deputation referred from the Full Council meeting of 14 December 2017 requesting clarification on the decision to install a 3G astro turf pitch at Hove Park and requesting that a new multi-sports surface be laid instead so that tennis users could share the facility with football groups.

49.8 The Chair provided the following response:

“It has been known for some length of time that the current artificial grassed area has fallen into serious disrepair and, on occasions, has been unavailable for use. Senior officers have held discussions with the users of the area, with the Ward Councillors and with myself, following which the decision was taken to procure a new 3G surface utilising developer contributions money specifically available for that purpose. That money gets spent on a 3G pitch or it would get spent out of the Hove Park area. The Council's Playing Pitch Strategy has identified the need for high quality 3G football pitches in the city and the fact that hundreds of children play on this popular pitch, already just restricted to the winter months, means that we know that the demand is there for an all-weather pitch of the type that is being proposed. With its seven all-weather tennis courts, Hove Park will continue to provide very good facilities for tennis. If, in the future, there is the opportunity to provide a soft surface for tennis as part of this provision then that can be explored”.

49.9 Councillor Littman stated that it would be beneficial for Members to receive a definitive criteria of what Section 106 money could and couldn't be used for.

49.10 The Legal Officer confirmed that clarification could be provided subsequent to the meeting in the form of a briefing note.

49.11 **RESOLVED-** That the deputation be noted.

50 MEMBER INVOLVEMENT

50.1 No items from Members were received.

51 FEES AND CHARGES 2018/19

51.1 The Committee considered a joint report of the Executive Director, Economy, Environment & Culture and the Executive Director, Neighbourhoods, Communities & Housing that set out the proposed 2017/18 fees and charges for the service areas covered by the Environment, Transport and Sustainability Committee in accordance with corporate regulations and policy. The Executive Director, Economy, Environment & Culture noted an error on page 28 of the agenda and the banding of 50% discount for

resident, traders and business permits would reduce from under 110g/km to under 120g/km rather than 100g/km.

- 51.2 Councillor West stated his surprise that the administration had decided on a 2% rise in fees and charges when the consumer index was rising at 3% and the retail index rising at 4%. Councillor West expressed his concern that the proposed fees and charges were not increasing in line with rising costs. Councillor West stated that the current administration had made constant criticisms of the previous administration in relation to parking surplus yet that surplus had risen from £9m to £14m in the first two years of their administration. Councillor West noted that visitor parking permits in Zones M, W and Z were proposed to rise by 29% yet there were many low-income households in those zones. Councillor West believed that the equality implications of that proposed rise should be reviewed. In addition, Councillor West observed that fees and charges for Travellers were proposed to rise by 3.9% which was above the general rise of 2%. Councillor West believed this to be an unacceptable measure upon one of the most vulnerable communities in society and contradicted the Traveller Strategy that outlined the need for stability and encouragement of travellers to occupy the transit and permanent site. Councillor West felt the proposed increases were unjustifiable and would lead to an equalities challenge.
- 51.3 The Executive Director, Economy, Environment & Culture clarified that the proposed fees and charges were a mixture of 0%, 2% and 4% rises, with the approach taken by officers set out at paragraphs 3.1- 3.3 of the report. In relation to fees and charges for the traveller sites, the Executive Director, Economy, Environment & Culture stated that to his knowledge, cost was not a barrier to entry to the transit or permanent site and some of those housed at the later would be entitled to housing benefit. The Executive Director, Economy, Environment & Culture supplemented that the permanent site costs compared favourably with other council tenancy costs.
- 51.4 Councillor Wares stated that he agreed with the comments made by Councillor West regarding increase to visitor permits. Councillor Wares noted that the cost of visitor permits for Zones N, Y and Z had risen by 50% over the past two years that was pushing the costs of visitor permits close to the cost of on-street parking. Councillor Wares believed this to be unfair opportunism rather than controlling demand. Councillor Wares stated that whilst overall the approach to fees and charges did accord with the corporate policy, there was a clear targeted approach. Councillor Wares stated that whilst everything that could be done to improve air quality should be done, the 25% increase on high emission vehicles, was in his view, discriminatory and unfair and only targeting a very select group of residents in certain zones, specifically those that could not afford to buy a more modern car. Councillor Wares likened the increase to a permit pollution tax that affected a small group of residents rather than commercial operators passing through the city, visitors to the city and those outside controlled parking zones that similarly had high emission vehicles. Councillor Wares believed that a serious approach to air quality should come through a properly considered report. Referring to appendix 5 of the report that covered allotment and sports fees, Councillor Wares stated that the cash value in the increase in fees was insignificant in his view. Councillor Wares stated that he believed the 4% rise was an attempt to retrieve the freeze of the previous year and whilst this might not appear a significant increase, he felt it would be a tipping point for some service users.

- 51.5 The Chair answered that there would be a report submitted to a future meeting of the committee detailing all of the work currently being undertaken on air quality.
- 51.6 Councillor Littman stated that whilst most increases in fees were reasonable or an inflationary rise, a few were not. Councillor Littman believed that the increase in charges for Regency Square Car Park could change the cost ratio between on and off street parking that could lead to a dangerous impact on congestion in the area. Councillor Littman agreed with the comments made in relation to the increase in visitor permits that he believed would impact most upon the elderly and vulnerable and represented an equalities issue. Councillor Littman also agreed with the observations made regarding fees for traveller sites adding that whilst he welcomed the assurance provided by the Executive Director, there had to be absolute certainty that fees would not deter occupancy. Councillor Littman expressed his disappointment in the 4% rise in sports fees as the economic and social benefits of health and activity were well established.
- 51.7 In relation to the question raised on Regency Square Car Park, the Head of Parking Services clarified that there was very little pay and display or shared bays in the locality and the limited parking was for up to a four hour period only. The Head of Parking Services added that a budget impact equality assessment was undertaken for all parking charges.
- 51.8 In relation to fees for manual renewal of scaffolding licences, Councillor Peltzer Dunn asked for clarification on the significant difference in fees for under 12m and over 12m. Councillor Peltzer Dunn asked for confirmation of what the parking charges for would be for the new CPZ Area L.
- 51.9 The Assistant Director- City Transport answered that there was an online process for applications for scaffolding licences and the necessity for manual renewal of scaffolding licences related to the need for officers to attend the site to check the licence was valid. It was often found that the licences had expired and therefore, officer time was required to prepare an issue a new one.
- 51.10 Councillor Peltzer Dunn asked why additional checks were required if the licence information was retained via the online system.
- 51.11 The Assistant Director- City Transport clarified that the approach was one of proactive regulation to ensure that the contractor was putting scaffolding up and taking it down within the set period and to ensure the highway was clear and properly managed. The Head of Parking Services clarified that the implementation of CPZ Area L had been brought forward at the request of ward councillors into the 2017/18 financial year. The price of a visitor permit would be £3.50 and it had been outlined in the consultation document that any prices would be subject to the annual parking permit review.
- 51.12 Councillor Wares noted the substantial rise in traders permits and asked officers if they were aware of how many permit holders this would apply to.
- 51.13 The Head of Parking Services replied that a precise figure was not known but traders permits applied to approximately 6% of all permits issued.

51.14 Councillor Peltzer Dunn stated that he did not understand why there were two separate charges for attended greens and unattended greens as a season ticket holder was permitted to bowl on any green in the city.

51.15 The Parks & Open Spaces Operations officer clarified that the difference in price represented the better service provided at attended greens.

51.16 **RESOLVED-**

- 1) That Committee approves the proposed fees and charges for 2018/19 as set out within the report and its appendices.
- 2) That Committee delegates authority to the Executive Director of Economy, Environment & Culture (in relation to paragraphs 3.4-3.6 and 3.10-3.14) and to the Executive Director of Neighbourhoods, Communities & Housing (in relation to paragraphs 3.7-3.9) to increase any charges for fees as notified and set by central Government during the year.

52 NEW BUS SHELTERS - CRITERIA FOR SELECTION OF SITES

52.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that proposed a robust assessment methodology for bus shelter site requests. The Senior Project Manager noted that there was a factual error in paragraph 3.4 of the report and “cost which can be ten times more” should read “cost which can be *considerably* more”.

52.2 On behalf of the Conservative Group, Councillor Wares moved a motion to amend recommendation 2.1 as shown in bold italics below:

2.1 That committee approves the methodology attached (Appendix A) for the assessment of requests for new bus shelters ***with the following amendments:***

i. Delete Scoring Detail for Initial Criteria, Criterion 3, NB1

ii. Point a) of Scoring Detail for Sites Identified as Feasible to read “Each site would be observed during a one hour morning ***and afternoon/evening peak and one hour morning ***and afternoon/ evening*** off-peak period, and numbers of users counted. They would then be prioritised in order of popularity ***in conjunction with the bus stop usage figures supplied by the bus operators***”.***

iii. To Scoring Detail for Sites Identified as Feasible add point c) to read “Locations with high demographic numbers of elderly and/or vulnerable people, as measured by partner organisations such as Brighton & Hove Connected, would be given an additional point”.

52.3 Councillor Peltzer Dunn formally seconded the motion.

52.4 Councillor Atkinson welcomed a more transparent and robust criteria. Councillor Atkinson stated that he had some initial concern about the removal of point 3 in the

amendment but believed that was balanced out by adding point c) to the feasibility assessment.

52.5 The Chair put the motion to the vote which were passed.

52.6 The Chair put the recommendations, as amended to the vote which were passed.

52.7 RESOLVED-

- 1) That committee approves the methodology attached (Appendix A) for the assessment of requests for new bus shelters with the following amendments:
 - i. Delete Scoring Detail for Initial Criteria, Criterion 3, NB1
 - ii. Point a) of Scoring Detail for Sites Identified as Feasible to read “Each site would be observed during a one hour morning and afternoon/evening peak and one hour morning and afternoon/ evening off-peak period, and numbers of users counted. They would then be prioritised in order of popularity in conjunction with the bus stop usage figures supplied by the bus operators”.
 - iii. To Scoring Detail for Sites Identified as Feasible add point c) to read “Locations with high demographic numbers of elderly and/or vulnerable people, as measured by partner organisations such as Brighton & Hove Connected, would be given an additional point”.
- 2) That officers bring back to a subsequent committee for approval the existing (and updated) list of requests with the new methodology applied.

53 STANMER PARK RESTORATION - PROCUREMENT OF HLF PROJECT WORKS AND RELOCATION OF CITYPARKS DEPOT

- 53.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that summarised the progress made to date on the Stanmer Park restoration project and sought agreement to recommend to Policy, Resources & Growth Committee (PR&G) to proceed with tendering and appointment of the main contractor for the HLF project. Furthermore, the report sought approval to recommend to PR&G Committee permission to progress the relocation of the CityParks depot to Hangleton Bottom with the necessary competitive tendering and appointment of contractors.
- 53.2 Councillor West explained that whilst he fully supported the Stanmer Park project, he had a number of misgivings about logistical management that was the subject of this report. Councillor West stated that he could not understand why planning permission had not been sought to re-site the depot in Hangleton Bottom, particularly as the issue had been the subject of discussion for a long time. Councillor West expressed his disappointment that Members had only recently been provided with site maps. In relation to the plans, Councillor West stated that the depot would take up a significant space in the Hangleton Bottom area with the only level access via the link road. Councillor West stated that this would cause complications in the future if the site was deployed as a waste site in line with its current designation. Councillor West observed that such questions would be asked at the planning stage by the council’s strategic

partners and the council may be asked to choose an alternative location as a designated waste site. Councillor West noted that the site itself was not ideal as a waste site and had indeed been rejected as a site by Brighton & Hove Energy Service co-operative for a food waste composting facility due to the topography, size and access issues associated. Councillor West stated that Policy & Resources Committee had agreed to the move in principle two years before and he was very dissatisfied that the CityParks depot would have to temporarily move for nine months awaiting the development of Hangelton Bottom at a cost of £100,000 that could have been avoided if the project had moved forward more quickly. In addition to that, there was an additional £300,000 shortfall in the expected capital receipts from property sales meaning a request would have to be made of Budget Council to make up the shortfall. Councillor West highlighted that such uncertainty potentially jeopardised the Stanmer Park project moving forward and he was very concerned about its future.

- 53.3 The Chair stated that she refuted Councillor West's claims adding that the current administration did not rush into decisions as the previous administration had done and instead took a careful and considered approach. The Chair stated that it would be unwise to submit a planning application without both this committee and PR&G having first considered and approved the project works and relocation.
- 53.4 The Executive Director, Economy, Environment & Culture stated that it was necessary to obtain landlord permission to use sites and PR&G Committee would be requested for that at its meeting on 25 January. The established process was for the permission to be obtained before submitting a planning application. Whilst planning permission had been sought ahead of a committee decision being approved on occasions in the past, this had sometimes led to criticisms of officers for pre-empting a committee decision. The Executive Director, Economy, Environment & Culture explained that the project had slowed since July 2017 due to a commitment of significant funding by Plumpton College. In order to accommodate the additional funding the council were able to attract, changes were made to the Stanmer Park walled garden that meant a slight delay to the project. The Executive Director, Economy, Environment & Culture stated that the CityParks depot would occupy a small portion of the Hangelton Bottom site and Planning Committee would consider the application in the context of planning policy. Estimates on capital receipts were always difficult to pre-judge and absolute assurance was needed that there was sufficient funding for the project from the outset.
- 53.5 The Parks & Green Spaces Operation officer clarified that the design of the access way in the yard would allow the rest of the site to be accessed afterwards and would not prohibit future use.
- 53.6 In relation to the points made relating to the advance submission of planning applications, Councillor Wares noted that PR&G Committee would receive a separate report at the same meeting this report would be considered for a proposed Animal Welfare Facility where planning permission had been applied for prior to any agreement by committee. Councillor Wares explained that he fully supported the Stanmer Park project however; he felt the report should have been more candid regarding the £100,000 temporary move costs as he found it unlikely that there would be much commercial opportunity in letting space next to a cemetery. Councillor Wares was of the opinion the relocation costs would be a one-off cost and as such the report should have reflected this. Councillor Wares agreed that it was possible to under-estimate capital

receipts in this instance however, the capital receipts were less than half that estimated which was quite catastrophic. Councillor Wares stated that alternatively, the depot would now cost twice as much as forecast two years ago. Councillor Wares believed it erroneous that capital resources were deemed the only option to make up the shortfall in funding and instead, reconsideration should also be given to selling further assets and the capital resource used to spend to save and provide relief to the revenue fund and benefit overall services. In relation to the proposed site, Councillor Wares noted that there would be one building for the depot and one building for animal kennels. Councillor Wares observed that the two buildings were very similar yet the depot had an estimated £750,000 build cost and the kennels an estimated £150,000 build cost. Councillor Wares asked for clarification on whether one project would be subsidising the other or whether each project could be built on a standalone basis. Councillor Wares acknowledged that whilst that would be a matter for the members of PR&G Committee to decide, the proposals appeared to him to be dysfunctional. Councillor Wares expressed his surprise that the opportunity for a single, dual purpose development had not been considered as that approach could improve economies of scale, remove duplication and achieve better value with taxpayer's money.

- 53.7 The Chair reminded Members that they were considering the report and the recommendations that applied to this committee not separate reports to PR&G Committee. Therefore, this was a standalone project with associated budget.
- 53.8 Councillor Wares agreed with the comments made by the Chair however, this committee were asked to recommend the report to PR&G Committee who would in turn be considering the report alongside a separate report for a development adjacent. Councillor Wares stated that he did not want to object to the report recommendations, nor reject proposals for Stanmer Park however, it was important for PR&G Committee to receive the observations made by this committee on the possibility for economies of scale and joined up thinking.
- 53.9 The Executive Director, Economy, Environment & Culture stated the report before committee detailed a standalone project, specifically the relocation of the CityParks depot that would unlock the Stanmer Park project and that the content outlined estimated costs at this stage. The Executive Director, Economy, Environment & Culture clarified that PR&G Committee could consider a debate for joining up of the two proposals at their meeting.
- 53.10 Councillor Wares asked for confirmation that this was a standalone project and by definition, that the budget for the relocation of the CityParks depot would not support the construction of the kennels.
- 53.11 The Executive Director, Economy, Environment & Culture answered that the Animal Welfare Facility report that would be considered by PR&G Committee was not in his directorate but an update could be provided at the meeting of PR&G Committee on 25 January.
- 53.12 Councillor Peltzer Dunn asked for clarification on the specific cost of the access road.
- 53.13 The Interim Assistant Director - City Environmental Management stated this was not available immediately but could be supplied after the meeting.

- 53.14 Councillor Peltzer Dunn stated that he did not find that satisfactory as the cost of the access road was likely to be a decent proportion of a major project. Councillor Peltzer Dunn requested that this information be provided to PR&G Committee as whilst the issue would be considered by two committees, a final decision would be made as one council.
- 53.15 The Chair stated that the comments made, particularly in relation to joined up thinking had been very well made. The Chair noted that the two proposals discussed covered different directorates and it had not been possible to provide answers to all the matters raised however, assurance would hopefully be made at PR&G Committee.
- 53.16 Councillor Atkinson stated that it was encouraging to see the restoration project move forward and he keenly anticipated its development into a major attraction in the city. Councillor Atkinson added that as ward councillor for a section of Hangelton Bottom, he would be representing his resident's views through the planning process.
- 53.17 Councillor Littman noted that paragraph 3.15 detailed a nine month delay between the parks operation moving from Stanmer Park to the new depot in Hangleton. Councillor Littman observed that should planning permission not be granted, the council would not be entitled to appeal the decision as landowner and asked if that would add cost and delay. Councillor Littman was of the opinion that an application for planning permission should have been made much earlier.
- 53.18 The Parks & Green Spaces Operation officer answered that in the event of a delay through the planning process; there would be indirect effects upon efficiency but no direct budget impact.
- 53.19 Councillor Wares stated that the project was an extremely positive step for Stanmer Park however; it was important to resolve the issues associated.
- 53.20 Councillor West stated that he was very unhappy to have been forced into a position however; he would be reluctantly supporting the proposals. Councillor West stated that there were significant risks associated with addressing the shortfall in budget and applying for planning permission and the council were in jeopardy of losing the HLF funding. Councillor West added that there had been an unacceptable two year delay and believed the administration should be held to account for that.
- 53.21 The Chair replied that it had been entirely prudent to wait for the outcome of the HLF bid.

53.22 RESOLVED-

That the Environment, Transport & Sustainability Committee:

- 1) Notes the progress made on the Stanmer Park HLF Restoration Project as outlined in this report.

RESOLVED TO RECOMMEND-

That the Environment, Transport & Sustainability Committee:

- 1) Recommends the report to Policy, Resources & Growth Committee as set out in paragraphs 2.3, 2.4 and 2.5 of the report.

54 RIGHTS OF WAY IMPROVEMENT PLAN

- 54.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that requested approval of the draft Rights of Way Improvement Plan (ROWIP) for wider consultation.
- 54.2 Councillor Wares stated that he welcomed the report however; he believed officers should consider managing expectations in relation to the budgets and associated projects listed on pages 48 and 49 of the draft ROWIP as approval of all the proposed projects may be beyond the range of the CityParks budget. Councillor Wares enquired whether the projected cost range needed amending accordingly and making clear that more projects would need additional sources of funding to be realised.
- 54.3 The Parks & Green Spaces Operations officer confirmed that Councillor Wares was correct in that not all projects could be achieved at the higher range of cost. However, over the previous ten years, the council had been very successful in attracting outside funding to deliver improvements.
- 54.4 Councillor West stated that he strongly believed the administration should put more financial commitment into downland estate access as the benefits to health and wellbeing and to the visitor economy could not be understated. Councillor West stated that any spending figures in the draft ROWIP needed to be taken seriously and met. Councillor West commended officers for the quality of the report, the Local Access Forum for being a key partner for the past ten years and tenant farmers who had been very accepting of new rights of way. Councillor West expressed his hope that that the consultation would facilitate wider discussion about the access and benefits of the downland estate. Councillor West expressed his concern that there appeared a lack of ambition on methods to engage with the public.
- 54.5 The Chair answered that there would be widespread consultation and promotion.
- 54.6 Councillor Littman concurred with the statements made by Councillors Wares and West that the draft ROWIP needed to be clearer about what was achievable in terms of resource so as not to be an obstacle to the consultation.
- 54.7 The Chair confirmed that the draft ROWIP could be altered to reflect those comments before it went out to consultation.

54.8 RESOLVED-

- 1) That the committee approve wider consultation on the draft Rights of Way Improvement Plan.

55 ITEMS REFERRED FOR FULL COUNCIL

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

The meeting concluded at 6.00pm

Signed

Chair

Dated this

day of

Subject:	Petitions
Date of Meeting:	20 March 2018
Report of:	Monitoring Officer
Contact Officer:	Name: John Peel
	Tel: 291058
	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
- calling a referendum

3. PETITIONS

3. (i) Henley Road Taxi Rank- Louise Creffield

To receive the following petition signed by 3 people (at the time of publication):

"We the undersigned petition Brighton & Hove Council to remove the taxi rank on Henley Road to enable parents to be able to park legally to take their children to Brighton Steiner School and provide more access to the local Co-op".

3. (ii) Friar Road area parking consultation- Iain Dreger

To receive the following petition signed by 114 people (at the time of publication):

“We the undersigned petition Brighton & Hove Council to undertake a Controlled Parking Zone consultation in the Friar Road area in order to consider and (if approved) implement parking restrictions that are resident-led and resident-friendly”

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: Consultation on a Controlled Parking Zone in the Surrenden Area**Introduction**

The Surrenden Area Parking Campaign (SAPC) is a community group representing the residents of 22 streets in an area bounded by Surrenden Crescent, London Road, Preston Drove and Surrenden Road to the junction with Braybon Road. Surrenden Road from Braybon Road to Ditchling Road is also included. The Surrenden Area streets are listed in the annex^(A1).

Proposition

Parking in the Surrenden Area is chaotic and causing danger to road users. SAPC seeks urgent public consultation on a controlled parking zone (CPZ) proposal before the end of 2018.

Issues

SAPC promoted a petition (38 Degrees^(A2)) and a parallel paper petition^(A3) over the 22 streets in the Surrenden Area between 28 November 2017 and 20 January 2018, calling for an urgent CPZ consultation. The selection of this area responded to community concerns that smaller CPZ designations cause parking diversion effects, which can and should be avoided^(A4). Aggregating paper and e-responses, 549 households were in support (55% of households in the area). Support for a CPZ has broadly doubled since summer 2015, when 264 households in the same area supported a Council CPZ proposal^(A5). Support has extended into many streets that did not support the 2015 proposal. Then, a CPZ was supported by a majority of households in 3 streets. By 2018, it was supported by a majority in 14 streets accounting for 459 (82%) of responding households, distributed evenly across the whole area.

SAPC undertook an electronic public opinion poll (Survey Monkey^(A6)) over the same period. Key poll findings include that 89% of respondents felt that residents' parking in the Surrenden Area has become more difficult in the past 3 years. 61% felt that inconsiderate parking is making local roads more dangerous for the elderly. 64% had the same view for school children. 80% felt that it was hazardous for other motorised road-users and that poorly parked high-sided vehicles were a particular concern. 80% were concerned at widespread parking in the limited number of on-street spaces by non-residents.

SAPC considers that the worsening parking situation in the Surrenden Area together with the substantial shift in public opinion that has occurred represent material

changes in the circumstances since the ETS Committee considered CPZ consultation priorities in October 2017.

Brighton & Hove City Council makes the largest parking revenue account surplus of any local authority in England outside London^(A7). A CPZ can repay consultation and capital costs within 3 years and render a positive income stream for transport initiatives in the city from year 4. A large CPZ for the Surrenden Area would enjoy wide support and justify the re-prioritisation of human and financial resources to consult residents and undertake a designation.

SAPC has met the Ward Members for Withdean Ward who have recognised the increased seriousness of the local parking problem, the change in community opinion since 2015 and assured us of their support for an early CPZ consultation in the Surrenden Area as a whole.

Evidence notes in support of this deputation are set out in the Annex.

Signed by:

Mary Allen

Michael Edwards

Anthony Meyer

Rynd Smith (Lead Spokesperson)

Anyia Symes

Annex: Supplementary Information and Evidence

(1) The Surrenden Area

The Surrenden Area includes all properties in the following 22 streets:

Bavant Road	Knoyle Road	Vardean Close
Cornwall Gardens	Mulberry Close	Vardean Gardens
Draxmont Way	Poplar Close	Vardean Holt
Fairlie Gardens	Preston Drove	Varndean Drive
Fircroft Close	Surrenden Crescent	Varndean Road
Harrington Road	Surrenden Holt	Whittingehame Gardens
Harrington Villas	Surrenden Road (entire road)	Withdean Crescent
Holly Close		

(2) The 38 Degrees Petition & (3) The Paper Petition

The 38 Degrees Petition was launched on 28 November 2017, supported by a leaflet drop and a street canvass until 20 January 2018. It said: **"Please introduce a controlled parking scheme to the extended Surrenden Area so that residents can park close to their homes, children can cross roads safely, visibility for drivers is improved, and out of area commuter, recreational and commercial vehicles are not parked on a long-term basis."** Click [here](#) to see the [38 Degrees Petition](#) online. The Paper Petition shared the same wording as the 38 Degrees Petition, to meet the needs of those who prefer not to use electronic petitions. It was taken door-to-door in the street canvass.

At the point of analysis for this report, there were 559 signatures to both petitions from households in the Surrenden Area, out of a total of 663 signatures. Adjustments have discounted 86 signatures from Brighton residents who do not live in the Surrenden Area and 18 signatures from beyond Brighton. 10 signatures from within the Surrenden Area have also been discounted (where more than 1 signature was made per household), leaving **549 adjusted signatures** in support. The 38 Degrees Petition remains live and has accumulated a small number of signatures since the preparation of figures included in this report.

(4) CPZ Area Designation: Technical Considerations

The SAPC recommends that a large and self-contained area should be designated as a CPZ, including all streets within a 15 minute walking time of key non-resident parking attractors (Preston Park Station commuter parking, St Mary's and Balfour Primary Schools, Varndean and Dorothy Stringer High Schools, Varndean VIth Form College and Downs Link College together with Preston Park, Preston Tennis Club and a number of nurseries and business such as dental and veterinary surgeries). The 22 streets in the Surrenden Area meet this criterion. The effect of applying a CPZ boundary that meets this criterion would be to make non-residents parking to use these key attractor facilities significantly re-appraise their travel and mode of transport decision-making. This in turn should reduce the adverse parking diversion effects typically experienced when smaller CPZs are designated. It should ensure higher revenue from permits and pay and display parking, from an earlier than typical time in the life of a CPZ.

(5) The Summer 2015 Brighton & Hove City Council Fiveways and Surrenden CPZ Proposal

The Surrenden Area was last formally considered for CPZ designation by the ETS Committee on 13 October 2015 (Report: Agenda [Item 23](#) and consultation area map at page 47; Minutes: [Item 23](#)). The area subject to consultation was a larger one than the current Surrenden Area. It additionally contained streets that are now within designated Zones G, J and J Extension. ETS noted a relatively low return rate for the consultation, together with representations from Ward Members that residents in what comprises the Surrenden Area were against the proposal. SAPC petition and survey work suggests that the position recorded in this report and minute has substantially changed.

SAPC notes that in 2015, the capital cost of that draft CPZ scheme was suggested to be £50,000 and the annual revenue to be £99,000. This revenue estimate appears to be very low, considering that the area has considerably greater potential to yield pay and display income than other suburban areas, due to its location close to a number of key parking attractors that will generate demand (see note 4 above).

SAPC notes that whilst there is scope for the variation of some detail in a 2018 consultation from the package provided to households in the 2015 consultation, the 2015 consultation documents (with the removal of streets now in designated CPZs) provide a solid starting point for the drafting of new consultation documents. The human and financial resource requirements associated with the preparation of a new consultation could be expected to be lower than those typically incurred in an area where a draft CPZ proposal has not been prepared for consultation before.

(6) The SAPC Survey Monkey Opinion Poll

The SAPC Survey Monkey Opinion Poll asked residents opinions about key parking topics between 28 November 2017 and 20 January 2018. There were 205 respondents (20% of households in the Surrenden Area). Invitations to the complete the Poll were on a leaflet distributed door-to-door and by email to households with known email addresses. The survey was completed online and independently, without the presence of a street canvasser. It was subject to an IP address control, meaning that it could not be completed more than once from the same device. Its findings in summary are as follows:

- | | |
|---|-----|
| • Parking in the Surrenden Area has become more difficult over the past 3 years. | 89% |
| • Reasons for concerns about parking: | |
| ▪ I can't park near my house | 39% |
| ▪ Crossing the road is more difficult | 58% |
| ▪ Poor parking makes the roads more dangerous for school students | 64% |
| ▪ Poor parking makes the roads more dangerous for the elderly | 61% |
| ▪ Parking by high-sided vehicles is adding to danger | 79% |
| ▪ People park here who do not live in the area (commuter parking) | 80% |
| ▪ Bad parking makes driving a hazard for motorised road users | 80% |
| ▪ A CPZ would improve the parking situation in my road. | 79% |
| • A nearby CPZ excluding my street would make parking conditions worse. | 93% |
| • Residents owning a mobile home (there are many of these parked in the area). | 5% |
| • Residents owning a commercial vehicle (there are many of these parked in the area). | 2% |

Click here for a more [detailed breakdown of findings](#).

(7) Brighton & Hove City Council Parking Revenue Account

On 9 December 2016, the RAC Foundation published research by David Leibling Transport Consultants analysing revenue from Council parking operations in 353 English local authorities. This found substantial year-on-year surpluses in many parking revenue accounts. In 2016, this analysis suggested that the City of Brighton & Hove had the 6th largest parking revenue surplus in England, and largest parking revenue surplus of any Council outside Greater London. Detailed breakdowns of this evidence can be found here:

- [Parking Revenue Tables](#), RACF / Leibling (2016); and
- [Parking Revenue Report](#), RACF / Leibling (2016).

SAPC recognises that Brighton & Hove City Council has pressures on its revenue and capital expenditure common to most local authorities. However, it has prudently generated a healthy parking revenue account. Our community seeks consultation over the designation of a large area containing over 1000 households. If 60% household take up of permits is assumed, an annual revenue of c£78,000¹ could be expected, with an additional revenue from pay and display parking of c£284,700², suggesting annual revenue of circa £0.35m for a CPZ covering the Surrenden Area.

The proximity of the area to key parking attractors (see note 4 above) suggests that pay and display revenues would be healthy. This revenue projection suggests a good rate of return on capital investment. Even if the Council has previously considered that it lacks the human resources to carry out an early consultation, investment in additional human resources to bring a consultation forward is justified.

SACP recommends an early report to ETS reviewing the basis for a CPZ proposal for the Surrenden Area.

20 March 2018

Brighton & Hove City Council

DEPUTATIONS REFERRED FROM THE MEETING OF FULL COUNCIL HELD ON 1 FEBRUARY 2018

Deputations received:

(i) Deputation: Night Buses, Brighton and Hove

As of Sunday 14th January 2018, Brighton and Hove Bus Company reduced the provision of night buses in Brighton and Hove. Under the Bus Services Act, 2017 – *a need for enhanced partnerships and the provision of routes that look at demand rather than profit*, we ask the council to review the impact of this on the city, to raise it with the B&H Bus Co. and to impress upon them the view that this much needed service needs to be maintained and why. I speak on behalf of my supporters and the community who feel strongly about this as evidenced by the 10,000 plus petition currently circulating and still growing which is due to be presented to the Bus Co.

We believe there are a number of cross-cutting issues and therefore ask that these are considered by the relevant committees:

Environment, Transport & Sustainability Committee to review:

- How key workers and shift workers will get home safely, affordably and in an environmentally-friendly way;
- How much longer taxi queues will impact on anti-social behaviour and therefore people's safety;
- The environmental impact due to increased taxi use;
- The safety of increased Uber use, which, as the Department of London Transport stated, is not a 'fit and proper' private car hire operator;
- The potential increase in unlicensed taxis and the increased risk of drink-driving.

Tourism, Development & Culture Committee to review:

- The negative impact on B&H's diverse nightlife; the effect on hospitality businesses' revenues and jobs;
- How our 11 million visitors (Festivals, Political Conference visitors and tourists) will be able to get home from events;
- How B&H will continue to attract much needed key workers/shift workers for the City's development without an appropriate 24-hour transport system; the impact on Brighton's student community.

Neighbourhoods, Inclusion Committees & Equalities Committee to review:

- How everybody (including women, the disabled, the young, the poor) will have equal access to B&H's City life and access to safe, affordable transport home;
- The impact on the disabled getting taxis with disabled facilities when taxis become oversubscribed.

We ask the council to liaise with their contacts in Sussex Police and the Business

Crime Reduction Partnership about the potential negative impact on their roles concerning safety in the city if people are unable to travel home safely. We request that B&H City council and its partners upholds its responsibility to review, to liaise with B&H Bus Co. about, and to mitigate for the now inadequate night bus service in our 24-hour city. We believe this responsibility is in line with BHCC's Corporate Plan 2015-2019 and The Connected City; BHCC's service priorities: Economy, Jobs, Young People, Health & Wellbeing, Community Safety, Environmental Sustainability; and the Bus Services Act, 2017.

With 270,000 plus residents, 11 million visitors, 2 universities and a conference centre, Brighton and Hove needs clean, reliable, easily-accessible, inclusive transport 24 hours a day.

Supported by:

Sarah Ashton (Lead Spokesperson)

James Milonas

Clare Ede

Mark Taylor

Lou Cope

Martin Doswell

Jeanette Ashton

Sally Franks

Xeni Milonas

Subject:	Night Buses Brighton and Hove – Deputation: Extract from the proceedings of the Council Meeting held on the 1 February 2018		
Date of Meeting:	20 March 2018		
Report of:	Executive Lead for Strategy, Governance & Law		
Contact Officer:	Name:	Mark Wall	Tel: 01273 291006
	E-mail:	mark.wall@brighton-hove.gov.uk	
Wards Affected:	All		

FOR GENERAL RELEASE

Action Required of the Environment, Transport & Sustainability Committee
To receive the item referred from the Council for consideration.

Recommendations: That the deputation be noted and considered by the
Environment, Transport & Sustainability Committee.

BRIGHTON & HOVE CITY COUNCIL**COUNCIL****4.30pm 1 FEBRUARY 2018****COUNCIL CHAMBER - HOVE TOWN HALL****MINUTES**

Present: Councillors Marsh (Chair), Simson (Deputy Chair), Allen, Atkinson, Barford, Barnett, Bell, Bennett, Brown, Cattell, Chapman, Cobb, Daniel, Deane, Druitt, Gibson, Gilbey, Greenbaum, Hamilton, Hill, Horan, Hyde, Inkpin-Leissner, Janio, Knight, Lewry, Littman, Mac Cafferty, Meadows, Mears, Miller, Mitchell, Moonan, Morgan, Morris, A Norman, K Norman, O'Quinn, Page, Peltzer Dunn, Penn, Phillips, Robins, Sykes, Taylor, C Theobald, G Theobald, Wares, Wealls, West and Yates.

PART ONE**66 DEPUTATIONS**

- 66.1 The Mayor reported that one deputation had been received from a member of the public and invited Ms. Ashton as the spokesperson for the deputation to come forward and address the council.
- 66.2 Ms. Ashton thanked the Mayor and stated that, "I have outlined everything in my deputation concerning the cancellation of Brighton and Hove night buses and it's clear that I, my 9 year old son and the 10,000 plus people who signed the petition so far feel quite strongly about this for our vibrant progressive city. May I have your response please?"
- 66.3 Councillor Mitchell replied, "I think any reduction to the current level of bus service provision in the city is to be regretted. Some of the concerns that you have outlined in your deputation coming here today were raised directly with the bus company responsible for the night buses at the Brighton and Hove Bus Watch meeting two weeks ago that I attended where the bus company said that it would keep its decision under review. This is of course a matter for the bus company and it is right that your petition is being presented to them. However, I will be very pleased to receive your deputation at the next Environment, Transport & Sustainability Committee meeting in March.
- 66.4 The Mayor thanked Ms. Ashton for attending the meeting and speaking on behalf of the deputation. She explained that the points had been noted and the deputation would be referred to the Environment, Transport & Sustainability Committee for consideration. The persons forming the deputation would be invited to attend the meeting and would be informed subsequently of any action to be taken or proposed in relation to the matter set out in the deputation.

Subject:	Petitions		
Date of Meeting:	20 March 2018		
Report of:	Monitoring Officer		
Contact Officer:	Name:	John Peel	Tel: 01273 291058
	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 by Members 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
 - calling a referendum

3. PETITIONS

3. (i) Traffic Calming measures on Vale Avenue- Councillors C Theobald, G Theobald and Wares

To receive the following petition signed by 124 people:

"We the undersigned, petition Brighton and Hove City Council to undertake traffic calming measures on Vale Avenue, Patcham to reduce the speed of traffic coming from the A23 & A27 onto residential streets that are on routes to school, the access to the main public Horsdean Recreation ground, the children's playing fields both sides of Vale Avenue including the Scout's building and down Church Hill, a very narrow street serving the church and cottages often used as a "rat run" to avoid the main roundabout intersection".

WRITTEN QUESTIONS**(i) Parking Enforcement procedures - Councillor Nemeth**

“Following discussions with a group of local plumbers, gas engineers and other tradesmen, who ultimately fund the Council’s trader permit scheme, would the Chairman explain the disparity in parking enforcement procedures between local tradesmen (whose work may include emergency call-outs) where enforcement is strict, and regional or national firms (such as BT) whose work often has no safety element but who are allowed to park illegally or dangerously for hours on end?”

ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE
AGENDA ITEM 62(c)i

Geoff Raw – Chief Executive
Brighton & Hove City Council

5th March 2017

Dear Geoff

We are submitting this letter under Council Procedure Rule 23.3 to be included on the agenda for the Environment, Transport & Sustainability Committee meeting of 20th March 2018.

Whilst assisting residents in having posts installed on the verge outside their property by the Council, for which residents would pay, the Highways team has advised that the Council are now deciding if such a service will continue or not. They further advise that all outstanding requests for posts (of which there is apparently a large backlog) are being held back pending a decision. It is understood that the Council presently provide the service via a contractor.

Having now suspended this service, we respectfully request that the Executive Director of Economy, Environment and Culture be requested to advise urgently on the following:-

1. The reasons behind the service being suspended.
2. The decision as to whether or not the service will be continued.
3. In the event the service is discontinued, what guidance the Council will give to residents who wish or need to protect verges with appropriate installations and what plans, procedures and processes the Council has in place to deal with instances when installations are placed on verges by residents that the Council deems inappropriate.

Yours sincerely

Cllrs. Lee Wares and Tony Janio

ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE
AGENDA ITEM 62(c)ii

Geoff Raw
Chief Executive
Brighton & Hove City Council
Grand Avenue
Hove

08/03/2018

Dear Geoff

Road Safety Measures for Mile Oak Rd

I am submitting the following Letter under Council Procedure Rule 23.3 to be included on the agenda for the Environment, Transport & Sustainability Committee meeting of 20th March 2018.

This specifically relates to the part of Mile Oak Rd from the Chalky Rd junction down to Brasslands Drive.

This stretch of road has been of concern to residents for many years now. My predecessor, Bob Carden, raised this issue from time and time and my current colleague, Cllr Gilbey, has also expressed concern regularly.

As you will see from the attached photos, there is a slight hill and a bend which obscures the line of sight for drivers approaching both from the southern part and the northern part of this section of the road. You will also see that there are cars and vans are parked on the eastern side of the road which effectively only allows for one lane of traffic/one vehicle to progress at a time through the road.

This means that cars, vans, buses or motorcyclists will often speed up the road, whether from the northern direction or from the south, in the hope of avoiding traffic coming from the opposite direction. This is done without the benefit of actually seeing if anything is heading their way from the opposite direction due to the hill and the bend in the road. If a vehicle is heading in their direction then you often have a situation where a driver then has to back up for some distance as there are often no passing points until after vehicles have left their parking spaces on the east side of the road as the day progresses. You will also often get a near collision as two drivers only spot each other at the last second.

It is only pure luck that there has been no serious or fatal accident in this incredibly dangerous part of our local highway. A motorcyclist was recently badly injured coming out of one of the small estates onto this part of the road and this issue is the most frequent concern I am contacted about by local residents.

This Letter is accompanied by two petitions. The first, an online petition, has attracted 351 (as at 2nd March) signatures at <https://you.38degrees.org.uk/petitions/urgent-action-on-mile-oak-road-traffic-safety> and the second, a paper petition, will be presented at the committee meeting.

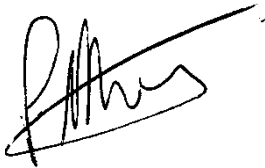
ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE
AGENDA ITEM 62(c)ii

Can I ask that the Council's Road Safety Team (or whatever team is responsible for this type of work) conduct an urgent safety and traffic assessment on this stretch of road with a view to quickly implementing whatever measures are possible and deemed appropriate in the short term i.e. passing spaces. This would then also allow for consideration of what other measures could be implemented to deal with this problem on a permanent and lasting basis.

I have also been contacted by a number of residents in Brasslands Drive who have a really dangerous right turn out of their road on to the Mile Oak Rd. This is at the bottom of the stretch of road referred to above and, as you'll see from the last photo, can often mean that they are turning on to the main road completely blind.

I would, of course, be happy to meet with the team on site and assist in any way I can.

Yours

A handwritten signature in black ink, appearing to read 'P. Atkinson', written over a horizontal line.

Cllr Peter Atkinson
North Portslade

ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE
AGENDA ITEM 62(c)ii

Driving south up from the Chalky Rd junction. Photo is misleading as there would normally be a solid line of parked cars and vans on the left (gas works so people not able to park)



Heading up towards the brow of the hill

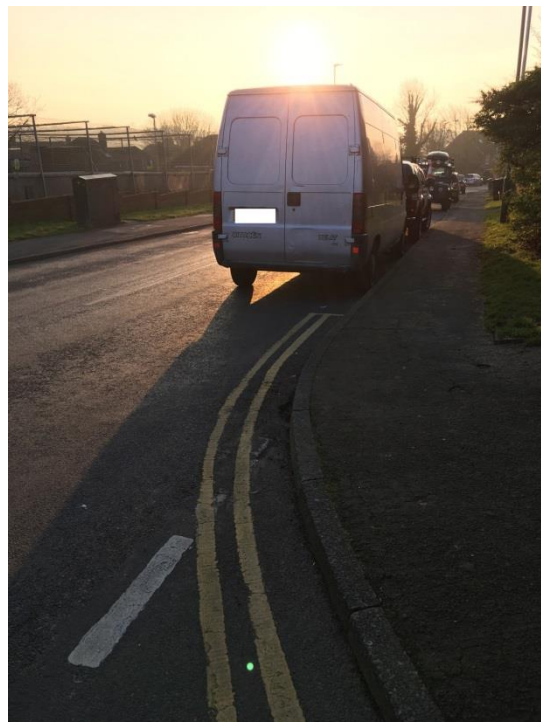


ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE
AGENDA ITEM 62(c)ii

Looking north towards the brow of the hill



Turning right out of Brasslands Drive



ENVIRONMENT, TRANSPORT & SUSTAINABILITY COMMITTEE
AGENDA ITEM 62(c)iii

Geoff Raw – Chief Executive
Brighton & Hove City Council

8th March 2017

Dear Geoff,

We are submitting this letter in accordance with procedural rule 23.3 for inclusion in the agenda of the upcoming Environment, Transport and Sustainability Committee for consideration.

As elected members for Withdean ward we are becoming increasingly concerned by the excessive parking problems in the Surrenden Road area. As we have highlighted to members of the committee over the years the expansion of nearby parking zones has caused a situation to go from bad to worse. We have in the past secured additional double yellow lines to help mitigate excessive parking but there is a growing acceptance from local residents that there needs to be parking controls to solve the problem.

We have also separately received representations from residents from the Friars Estate to be included in a consultation.

We are therefore pleased that the area is due to have a consultation as residents should have their say in shaping solutions to this problem. We are however dismayed that such a consultation will not take place until 2020.

We therefore ask that the committee considers bringing this forward in the timetable to ensure this area of considerable parking stress is given the attention it warrants.

Kind regards,

Cllrs Ann Norman Ken Norman Nick Taylor

Council	Agenda Item 72 (8)
1 February 2018	Brighton & Hove City Council

NOTICE OF MOTION**GREEN GROUP****CLEAN AIR DAY**

This council notes that Nitrogen dioxide concentrations in Brighton and Hove continue to exceed EU and UK standards; with Public Health England estimating that exposure to 'fine particulate matter' contributes 5-6% to all causes of annual mortality in the city.

This Council resolves to:

1. Request that a report be brought to Environment, Transport and Sustainability Committee, exploring the potential to introduce an annual Cleaner Air Day from 2018, with the aim of raising awareness of the causes and effects of air pollution and thereby helping residents to understand how they can help clean up our air and protect themselves and their children.
2. That such a report assess the implementation of a Cleaner Air Day with consideration of:
 - suitable roads to be closed,
 - the most practicable date,
 - any economic and environmental costs and effects, both short and long term.

Proposed by: Cllr Greenbaum

Seconded by: Cllr Mac Cafferty

Supporting Information:

In Paris last September, emissions went down 40% on their 3rd annual *journée sans voitures*. This has been so successful it has both been repeated and also expanded from the historic city centre to the entire city. Reduced noise has also been very popular with residents. <http://www.independent.co.uk/news/world/europe/paris-car-ban-day-pollution-climate-change-a7981196.html>

A Cleaner Air Day would involve closing some city centre roads to traffic, organising a volunteer-led 'no-idling' patrol, as well as community, school, business and workplace led awareness and pollution reduction events. Suggested dates are June, to align with UK Clean Air Day, or September, to align with International Car Free Day.

In Brighton and Hove exposure to fine particulate matter is linked to 175 deaths each year and a factor in health conditions such as stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases, including asthma. Reducing air pollution benefits all but particularly our children and older people who are disproportionately affected. Research on the link between air pollution and childhood asthma (Kings College London):

<https://www.kcl.ac.uk/lsm/research/divisions/aalb/newsevents/newsarchive/featured/exhale.aspx>

There is a real threat of legal action if we do nothing to act on air pollution:

<https://www.clientearth.org/air-pollution/>

Subject:	Official Feed and Food Controls Service Plan 2018/19		
Date of Meeting:	20th March 2018		
Report of:	Executive Director of Neighbourhoods Communities & Housing		
Contact Officer:	Name:	Nick Wilmot	Tel: 01273 292157
	Email:	nick.wilmot@brighton-hove.gcsx.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.

2. RECOMMENDATIONS:

- 2.1 That the committee agrees the Official Feed and Food Controls Service Plan 2018/2019 set out in the appendix to this report.

3. 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 Safer Community services.
- 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. Key performance targets are completion of 98% of programmed food safety interventions, 90% of service requests responded to within 5 days and 96% of food businesses being deemed 'Broadly Compliant' ie having a Food Hygiene Rating Score of 3 out of 5 or better.
- 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.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The plan and activities detailed within it are legally required to comply with the Food Law Code of Practice.

5. COMMUNITY ENGAGEMENT AND 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 2018/2019 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 2018/19 will be met from the Food Safety revenue budget within Safer Communities services. The proposed 2018/19 net budget for the Food Safety service is £0.562m, subject to agreement by Budget Council on 22nd February 2018.

Finance Officer Consulted: Mike Bentley

Date: 02/02/18

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 2018/19 identifies the planned number of interventions for that period.

Lawyer consulted: Elizabeth Culbert

Date 02/02/18

Equalities Implications:

- 7.3 An Equalities Impact Assessment has been undertaken. See 2.4.5 of appendix 1 for profile of the ethnicity of food business proprietors where notified during the year 2016/2017. 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

7.4 None

Any Other Significant Implications:

Public Health Implications:

7.5 The Food and Feed Service Plan is seen as key to protecting public health in the City. It is in line with the stated outcome to 'reduce health inequalities and long standing public health issues' as part of the priority of tackling inequalities which states that 'we will continue with high profile enforcement of food and health and safety rules, maintaining our excellent record of environmental health improvements.'

SUPPORTING DOCUMENTATION

Appendices:

1. Draft Official Feed and Food Controls Service Plan 2018/2019

Documents in Members' Rooms

1. None

Background Documents

1. None

APPENDIX 1
Brighton & Hove City Council Official Feed and Food Controls Service
Plan 2018/2019

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 the Safer Communities Service of the Neighbourhoods, Communities and Housing Directorate. The Head of Safer Communities reports direct to the Executive Director of Neighbourhoods, Communities and Housing.
- 1.1.2 The strategic aim of the Directorate being to put communities at the heart of our services. To this end the Directorate consolidates all Environmental Health and Trading Standards enforcement teams in one service.
- 1.1.3 The service is primarily concerned with protecting and improving public health 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.
- 1.1.4 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.
- 1.1.5 Trading Standards officers aim to provide a comprehensive range of enforcement and advisory services to the community within a statutory framework. It's goal is to contribute, in conjunction with other agencies, to the development of a safe, fair and equitable trading environment for all consumers and businesses, by means of advice, information, education and enforcement.

The core aims being to ensure: -

- Accurate food information for consumers.
- That compositional standard of food is maintained.
- That food and feed are free from unsafe contaminants

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 for 2015-19 is to provide strong civic leadership for the wellbeing and aspiration of Brighton and Hove. The Council will be successful if it is judged to have delivered:

- **A good life** – ensuring a city for all ages, inclusive of everyone and protecting the most vulnerable
- **A well run city** – keeping the city safe, clean, moving and connected
- **A vibrant economy** – promoting a world class economy with a local workforce to match
- **A modern council** – providing open civic leadership and effective public services

1.2.2 The Official Feed and Food Control Service Plan has strong links with all of these aims.

1.2.3 The service has a published Enforcement Policy. This policy is a cornerstone for fair and open enforcement.

1.2.4 The service continually monitors business opinion through satisfaction surveys. 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 Demographic information is available from online Brighton & Hove Connected <http://www.bhconnected.org.uk/>. There were 289,229 residents according to the Office for National Statistics latest mid-year population estimate (2016).

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. The Economic Impact Assessment of 2015 produced by Tourism South East estimated that £858M worth of direct sales were generated for local businesses by visitors to the city in that year.

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 Transport & Sustainability Committee.

2.3 Scope of the Feed 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;
- Promoting healthy catering initiatives within local food businesses.

- 2.3.2 The food standards function is carried out by Trading Standards Officers. The work of the team includes the following: -

- Risk based enforcement activity – including inspections
- 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 products 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. Trading Standards have responsibility for the enforcement of regulations pertaining to allergen information relating to food

2.4 Demands on the Feed and Food Service

Food Safety

2.4.1 As at January 2018 there were 3249 food businesses registered. These premises are broken down into the following profile:-

6	Primary Producers
53	Manufacturers/Processors
3	Packers
8	Importers/Exporters
30	Distributors/Transporters
603	Retailers
2544	Restaurants and other Caterers
2	Manufacturers Selling Mainly by Retail
3249	TOTAL

2.4.2 Five 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.

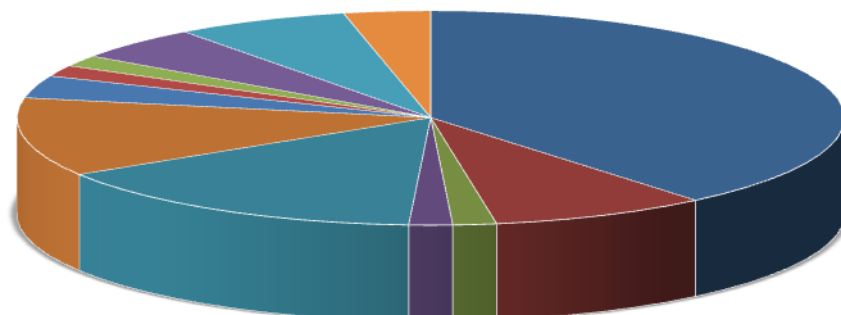
2.4.4 Premises data is captured on Uniform and therefore the premises profile is the same but as the risk assessment is based on the LGR scheme the individual premises have a different inspection frequency for Food Standards. As of the January 2018, 2960 premises were considered to have an 'inspectable 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. The data gathered for the eleven months to January 2017 58.7% of those who

gave an answer identified themselves as White British. The ethnicity of the remaining businesses identified as below.

Ethnicity of Food Businesses Where Notified 2016/2017



- | | |
|---|---|
| ■ 16.1% Any other White background | ■ 3.5% Asian or Asian British - Bangladeshi |
| ■ 0.7% Asian or Asian British - Indian | ■ 0.7% Asian or Asian British - Pakistani |
| ■ 6.3% Any other Asian Background - Chinese | ■ 4.9% Any other Asian Background |
| ■ 1.4% Mixed - Asian & White | ■ 0.7% Mixed - Black African & White |
| ■ 0.7% Mixed - Black Caribbean & White | ■ 2.1% Any other mixed background |
| ■ 2.8% Arab | ■ 1.4% Any other ethnic group |

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.

2.4.7 Access to the service is provided by:

- Visiting either Bartholomew House Customer Services Centre, open hours 8:45am to 4:30pm weekdays or Hove Town Hall, opening hours 10:00am to 4:30pm;
- 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 usually 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 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 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

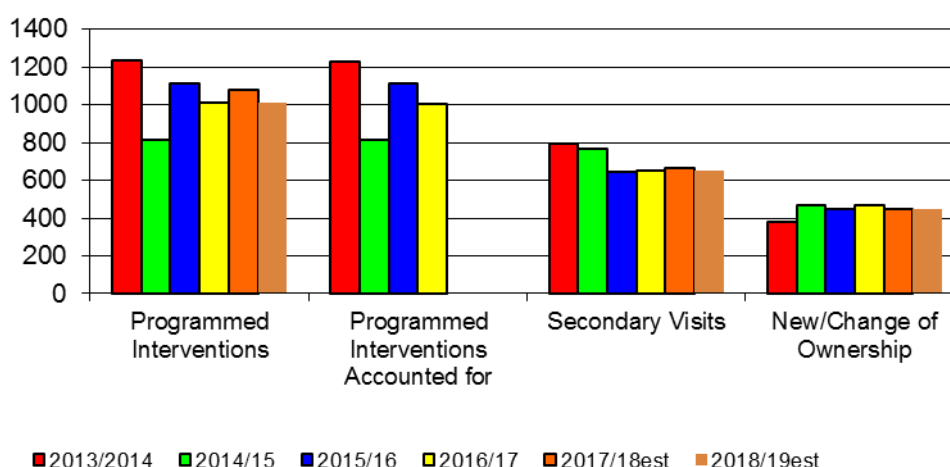
3.1 Interventions at Food and Feedingstuffs Establishments

Food Safety

3.1.1 This section details the planned risk based food safety intervention programme for 2018/2019. The level of achievement in food safety intervention based activity over the past four years is shown in the chart below and Table 3.1.1 along with estimates for completion of the current year and 2018/2019.

3.1.2 Inspection intervals are calculated on a risk-based approach. The service sets a target of 98% compliance with the annual programme. 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.

Chart of Intervention-Based Activity 2013-2019



See tables 3.1.1 and 3.1.3 for further details.

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
Programmed Interventions	1232	815	1116	1008	1079	1009
Accounted for	1230	811	1113	1004		
Target %	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D
Achieved%	99.8 A-D	99.5 A-D	99.7%	99.6%		

Table 3.1.1 Achievement of Planned Food Safety Inspection/Intervention Programme 2013-19.

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 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. Data on the number of interventions undertaken since 2013 and estimates for 2017/18 and 2018/19 can be seen in table 3.1.2.

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.

Year	13/14	14/15	15/16	16/17	17/18est	18/19
Questionnaires	191	201	255	123	125	150
Visit	20	37	40	2	60	40

Table 3.1.2.Premises dealt with under alternative strategy or inspected.

3.1.6 Planned food safety interventions programme for the year 2018/2019 as estimated at 5th January 2018 being:-

Risk Category of Premises	Number of Interventions Due
A	3
B	70
C	343
D	593
Total	1009
Low-risk premises due for intervention	320

3.1.7 A further target is to ensure that at least 95% of food establishments are 'broadly compliant', with a Food Hygiene Rating Score (FHRS) of three or more.

3.1.8 As at January 2018 the level of broadly compliant establishments rated in the FHRS scheme stood at 96.5%. This level of compliance protects public health, the local economy and reputation of the council as a responsible regulator.

3.1.9 **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.

3.3.10 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.

3.1.11 Safeguard measures associated with the FHRS permits any food business that does not attain the top rating to request a rescore once any necessary issues have been resolved. Any revisit is unannounced.

3.1.12 In late 2016 the service introduced a charge for those businesses who requested a rescore visit. Between September 2016, when the charge was introduced, and January 2018 52 businesses pursued this option.

3.1.13 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.

3.1.14 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.

3.1.15 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 2018/2019.

3.1.16 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	13/14	14/15	15/16	16/17	17/18est	18/19est
Secondary inspections	797	766	647	654	665	680
New Premises or Change in Ownership	383	470	450	467	450	450

Table 3.1.3 Estimate for 2017/2018 and 2018/19 based on data since 2013.

3.1.17 It is estimated that the number of staff required to carry out the programme of inspections plus other visits is 7.25 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 and Feed Hygiene

3.1.18 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 221 high risk, 50% of the 951 medium risk and 20% of the 1788 low risk premises should be visited each year. The service is proposing to move to the FSA risk rating scheme at the start of 2018/19 which may result in a variation of figures going forward. This scheme will align us with Food safety colleagues and allow us to have an accurate risk rating for feed premises.

3.1.19 The target for 2017-18 was to visit 135 high-risk and 475 medium risk premises liable to inspection. Similar targets will remain in place for 2018/19.

- 3.1.20 There is no commitment to visit low risk premises but in 2017-18, 184 low risk premises were visited up to 24th Jan 2018 as a result of project work, complaints and other routine inspections.
- 3.1.21 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.
- 3.1.22 One full time and one part time posts make up the Food Standards Team. This equates to 1.6 FTE. About 95% of their time is spent on the food and feed function.
- 3.1.23 **New Businesses** – Trading Standards Officers aim to assess new food businesses within 56 days.
- 3.1.24 **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.
- 3.1.25 **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 and misdescribed goat meat.
- 3.1.26 **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. Where medium risk rated premises have a Primary authority relationship with a local TS service, or if they are part of a national chain, these premises will be re rated to low risk. This will allow officers more time to support independent and new businesses.
- 3.1.27 **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.
- 3.1.28 **Feed Hygiene** – The service participates in the National Trading Standards feed programme. We will undertake inspections of premises identified by the national team as requiring a visit. This equates to approximately 12 visits per annum.

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	12/13	13/14	14/15	15/16	16/17
Within target %	96.2	95.4	96.8	97.2	96.6

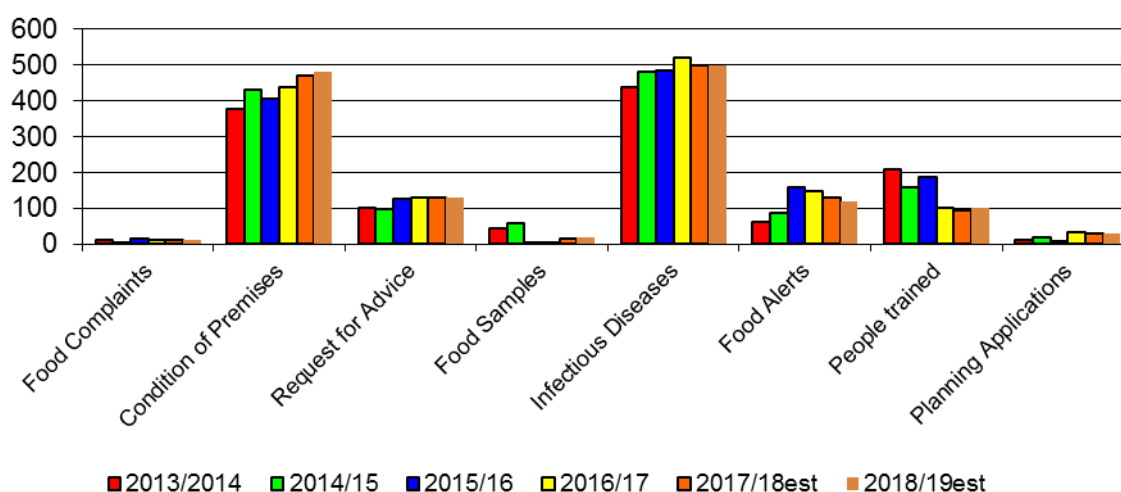
Table 3.2 Percentage of Demand Driven Work within Target Response Time

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 2013 and estimates for the current year and 2018/2019. The source figures for this chart are contained in tables within the relevant part of the plan.

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
Food Complaints	12	2	20	11	10	10
Condition of Premises	377	430	406	440	470	480

Table 3.2.1 Estimate of complaints for current year and 2018/2019 based on data from 2013 onwards.

Chart of Demand Driven Work 2013-2019



See tables 3.2.1, 3.4.1, 3.5.0, 3.5.1, 3.6 and 3.8 for the source of data.

3.2.3 It is estimated that 1.65 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 2017/18 as the report is generated before the end of the calculated year.

Year	13/14	14/15	15/16	16/17	17/18est
Number of Complaints	100	106	133	125	130

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 10 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 and an e-newsletter. In 2016 the service introduced an e-data base enabling group emails to be sent to over 1200 food businesses in the city. A newsletter is now sent electronically to this group twice a year.

3.4.2 Table 3.4.1 gives the number of planning applications viewed by food safety officers and the number of requests for advice from businesses. Such focussed guidance includes advice on the construction, development and structural alterations to food establishments.

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
No of Requests	101	98	125	128	130	130
Planning Applications	12	19	7	31	30	30

Table 3.4.1 Requests received since 2013 and estimates for the current year and 2018/2019

3.4.3 It is estimated that 0.5 Full Time Equivalent Officer is required to meet this estimated demand.

Food Standards

3.4.4 The level of requests for advice has remained reasonably consistent over several years. The following figures show an estimate for 2017/18 as the report is generated before the end of the calculated year.

Level of Service Requests					
Year	13/14	14/15	15/16	16/17	17/18 est
No of Requests	153	149	190	146	150

3.5 Feed and Food Sampling

Food Safety

3.5.1 A formal arrangement is in place with Public Health England's (PHE) 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 PHE and regional sampling programmes across Hampshire, Kent, Surrey and Sussex. 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 The three national food sampling programmes for 2017/2018 were:-

- Study 60 – Paan (Betel), Curry, Banana, Vine leaves with particular emphasis on Salmonella.
- Study 61 – Chilled RTE foods from Eastern Europe and other retail premises with particular emphasis on Listeria
- Study 63 - Ovens used for cooking meat joints in Catering Premises, with a specific focus on slow cooking ovens and Salmonella

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
No. of samples	44	57	6	3	15	20

Table 3.5.0 Food Safety Samples Submitted 2013-2017 & estimate for the current year and 2018/2019.

3.5.4 Arrangements are in place with the PHE laboratory at Porton Down for the analysis of samples that require microbiological examination.

Food standards

3.5.5 The Public Analyst contract was awarded to Kent Scientific Services in 2017. The current allocation of budget for sampling analysis is £4,900. The focus of the contract remains composition, labelling and chemical contamination. .

3.5.6 Inspections, investigations and advice for 2017/18 equated to approximately 1.6FTE.

3.5.7 A budget of £ 4,900 was allocated in 17/18 to facilitate the contract with the appointed Public Analyst for the purposes of food analysis. In 2017 the FSA withdrew all funding for National and Regional Sampling. Sampling programmes locally have therefore been based on TSSE regional programmes. In 2017/18 some funding for sampling was provided via TSSE in order for local authorities to participate in Regional Sampling programmes; it is anticipated that this funding will continue in 2018/19. It is intended that in 2018/19 further sampling will be undertaken locally focusing on meat species and specifically goat meat due to a high rate of non-compliance identified in 2017/18 and also sampling for allergens; it is anticipated that this will tie in with TSSE led projects.

Food Sampling Work undertaken in 2017/18

	PROJECT
	Wine and Spirit sampling
	Meat species
	Allergens including Gluten Free
	Complaints and investigations

3.5.8 The FSA has withdrawn all funding for National initiatives. The cost for the regional and local projects will be set to allow for contingencies, such as complaints and reacting to food alerts.

3.5.9 During 2017/18 Trading standards have also carried out work funded by the FSA via NTSB (National Trading Standards Board) on animal feed which ties in to the Official Feed and Food Controls. This work will be funded again in 2018-19 but funding is likely to be reduced.

3.5.10 New regulations governing the labelling of food and whether they contain allergens, came into force in 2014. Officers have undertaken work to inform businesses of their obligations under these regulations, by holding business surgeries and providing guidance in the twice yearly Food Safety newsletter as well as during routine visits and via mail shots. Compliance with the requirement to provide allergen information still remains an issue and therefore this work will continue in 2018/19 prioritising advice to small independent traders.

3.5.11 **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 2013 to 2017 and an estimate of the numbers expected for the current year and 2018/2019. Investigations of outbreaks must commence as soon as practical. In individual notifications, the investigation has to commence within 5 days. It is estimated that 0.6 FTE officer will be required to meet this level of complaints.

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
No. of reports	439	480	485	522	500	500

Table 3.5.1 Notifications for 2017/2018 & 2018/2019 based on data from 2013 onwards.

3.5.12 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.

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
Campylobacter	226	293	267	282	290	300
Salmonella	42	11	20	36	25	20

Table 3.5.2 Estimate of Number of specific notifications for 2017/2018 & 2018/2019

3.5.13 Food-borne illness can be contracted as a result of a number of reasons including poor food handling in the home or foreign travel. Usually 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.

3.6.4 From January 2018 the FSA have introduced a Smarter Communication platform where messages can be sent out directly to each individual enforcement officer.

Year	13/14	14/15	15/16	16/17	17/18est	18/19est
Food Alerts	60	86	158	147	130	120

Table 3.6 Food Alerts for the current year and 2018/19 based on data from 2013 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 Food Safety team sends a representative to 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.
- An officer attends the regular liaison meetings with Children's Services and school caterers.
- 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.

This work is accounted for in the reactive work estimate of resources required.

Food Standards

- 3.7.2 The team works closely with 19 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. Officers also use this forum to receive advice and intelligence regarding the feed function.

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 promoting healthy menu options via the Healthy Choice Award in a diverse range of settings targeting health inequality: nurseries, breakfast clubs and after-school clubs and care homes.
- 3.8.2 From 1st April 2018 BeeZees will take over provision of the majority of these services with breakfast clubs and nurseries being administered from within the food safety team.
- 3.8.3 A Project Officer works within the Food Safety Team to develop and co-ordinate the Healthy Choice Award. The award prioritises the preparation of meals using fresh ingredients, the use of healthier ingredients and cooking methods and adequate opportunities for customers to make healthier choices if they wish. As at January 2018 100 food outlets have gained the award with a further 30 working towards accreditation.
- 3.8.4 The programme also supports the Public Health Sugar Smart City campaign. Sugar Smart City aims to motivate settings such as schools,

food outlets and retailers to take action and help residents reduce their sugar intake. Food outlets are being asked to make 'Sugar Smart Commitments' such as to promote free tap water for customers, offer a range of low and no sugar soft drinks, or to develop lower sugar dessert or children's menu options. Outlets are also being asked to volunteer to put a 10p levy on non-alcoholic soft drinks they sell which contain added sugar. This money will be paid into the Children's Health Fund to support projects that aim to improve children's health and food education.

3.8.5 Between September 2015 and November 2017 several healthier frying workshops have been staged for food outlets. Topics including oil maintenance and general good practices, types of oils and their properties, allergy and health, financial and environmental implications being covered. 130 chefs, managers, front of house staff and business owners have attended these sessions.

3.8.6 The food safety training activity by number of people trained on the CIEH Level 2 Award Food Safety in Catering course is given below in table 3.8. This is a full day course aimed at food handlers.

3.8.7 The service has reduced the number of courses staged per year from 12 to 8 to make each course financially viable.

Year	2013/14	2014/15	2015/16	2016/17	2017/18est	2018/19est
Trained	208	160	187	100	94	100

Table 3.8 Total Training Undertaken since 2013

3.8.8 The service took part in Food Safety Week 2017 by organising displays in Customer Service Centres at Bartholomew House, Hove Town Hall, Brighton Town Hall and Brighton Library.

3.8.9 It is estimated that this promotional work will be covered within resources plus the addition of a fulltime project officer to manage and co-ordinate food nutrition work.

4. Resources

4.1 Financial Allocation

Food Safety

4.1.1 The net budget for the Food Safety Service for 2017/18 was £588,450. The budget for 2018/19 has yet to be set. As with all other services provided by Brighton & Hove City Council Safer Communities services are subject to a four year savings plan ending in 2019/20. Savings of £14,000 have been identified against the Food Safety service budget for 2018/19 which will come from ancillary administrative support.

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 2017/18 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	£ 54,370

The budget has not yet been set for 2018/19 but similar funding levels are envisaged.

4.2 Staffing Allocation

Food Safety

- 4.2.1 Establishment of the Food Safety Team for the year 2018/2019 is 10.8 full time equivalent field officers plus two full time equivalent administrative support staff, management and Food Nutrition Project Officer, broken down as follows:-
2 x Senior Environmental Health Officers
3.6 x Environmental Health Officers
2.56 x Senior Technical Officers
1.68 x Technical Officer
1 x Food Nutrition Project Officer
- 4.2.2 As detailed in 3.1.17, 3.2.3, 3.4.3, 3.5.11 and 3.8.7 of this plan it is estimated that 11 full time equivalents are required to fulfil the given objectives plus management. This is inline with the allocated resources.

Food Standards

- 4.2.3 The Inspection and Sampling Team is responsible for Food Standards Inspection. The proportion of time allocated to this function in 2017/18 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 All food safety field officers hold relevant qualifications to comply with the requirements of the Food Safety Code of Practice. In addition to the annual appraisal system ongoing professional development is monitored and managed through officer self assessment, management monitoring, regular 1-2-1's and the quality assurance system detailed in 5.1.1 below.

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. Staff performance is reviewed, monitored and managed through the appraisal system, monthly 1-2-1 and review by the departmental management team.
- 5.1.2 The service actively seeks the views of businesses by giving out post-inspection questionnaires to traders inspected. From the eleven months to January 2017, 161 questionnaires were returned. The key findings of these returns were:-
- 95.7% of respondents either agreed or strongly agreed that their business had been treated fairly.
 - 100% of respondents understood the purpose of the visit to their premises.
 - 99.3% found the information given to them by the visiting officer easy or very easy to understand.

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 2016/2017, 99.6% 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. 467 interventions were undertaken of new businesses or premises that had changed ownership.
- 6.1.4 At January 2018, 96.4% of the food businesses in the city were deemed to be 'broadly compliant', or better ie a FHS of three or better.
- 6.1.5 From April 2017 to March 2018 18 Hygiene Improvement Notices were served and one business prosecuted for food hygiene offences.

Food Standards

- 6.1.6 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.
- 6.1.7 The Service Reviews indicate that the service is on target to achieve the interventions programme.
- 6.1.8 During staff one-to-one's each officer's performance is monitored, to identify good performance and any areas of improvement.
- 6.1.9 Complaints are responded to within the stated timescales.

6.2 Identification of Any Variation from the Service Plan

Food Safety

- 6.2.1 There was no significant variation from the 2016/17 Service Plan during the year.

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 year on year. Table 6.3 demonstrates the improvement which has been built on the local Scores on the Doors scheme since migration to the national scheme in March 2012.

FHRS rating	January 2013	January 2018
0	3	5
1	113	54
2	92	40
3	265	228
4	589	587
5	1377	1839
Total	2624	2753

Table 6.3. Number of food businesses in each FHRS Comparing 2013 and 2018 Ratings

- 6.3.2 The number of Broadly Compliant businesses has continued to increase and currently stands at 96.4% of all food business.
- 6.3.3 The food nutrition project work detailed in 3.8.1 to 3.8.5 of this plan has been recognised by the Chief Executive of Public Health England, Duncan Selbie, as a national example of good practice in the fight against childhood obesity.

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 misdiscription and traceability, this work links in with the Licensing Authority function and Alcohol Project Board.
- Better publicity for the healthy eating education message.
- Increasing and maintaining the competency and professional development of food officers.
- Establishing consumer concerns and reflecting this in local activity.
- Improving our data records and risk rating
- Improving the availability and accuracy of allergen information.
- Providing support and assistance to independent SMEs n(Small and Medium Enterprises)
- Targeting Food Fraud

Subject:	Health and Safety Service Plan 2018-19		
Date of Meeting:	20th March 2018		
Report of:	Executive Director Neighbourhoods, Communities and Housing		
Contact Officer:	Name:	Nick Wilmot	Tel: 01273 292157
	Email:	nick.wilmot@brighton-hove.gcsx.gov.uk	
Ward(s) affected:	All		

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

- 1.1 The Health & Safety Service Plan is required under the National Local Authority Enforcement Code, issued by the Health and Safety Executive, under Section 18 of the Health and Safety at Work etc Act 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.
- 1.3 Recent years' activities were determined by reducing service budget, the local public health agenda and the 'better regulation' agenda. Deregulation impacted on health and safety following Lord Young's review of health and safety, Common Sense - Common Safety, the Löfstedt review recommending reducing the burden of unnecessary regulation on businesses and the HSE's National Local Authority (LA) Enforcement Code which provided a principle based framework that recognised the respective roles of business and the regulator in the management of risk.

2. RECOMMENDATIONS:

- 2.1 That the Committee approves the proposed Health & Safety Service Plan 2018/2019 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), National Local Authority Enforcement Code. This Code 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 five 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 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

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The Service Plan is a statutory requirement. LAC 67/2(rev 7) and The National Local Authority Enforcement Code provides direction to Local Authorities on meeting statutory requirements.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 None

6. CONCLUSION

- 6.1 This report details how the Council intends to comply with its statutory duties.
- 6.2 Whilst the primary responsibility for managing health and safety risks lies with the business who creates the risk, health and 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:

7.1 Financial Implications:

There are no direct financial implications arising from this report. The costs of implementing the service plan are budgeted for within the Neighbourhoods, Communities and Housing Directorate.

Finance Officer Consulted: Monica Brooks

Date: 18th January 2018

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: Elizabeth Culbert

Date: 5th January 2018

Equalities Implications:

- 7.3 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:

- 7.4 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:

- 7.5 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.
- 7.6 A safe and healthy workforce benefits the local economy and develops the city's tourism.

Crime & Disorder Implications:

- 7.7 The reduction in preventative work may lead to an increase in poorly performing business resulting in more enforcement action,

Risk and Opportunity Management Implications

- 7.8 Proportionate decision making is required by the Council's Enforcement Policy, HSE's Enforcement Policy Statement and Enforcement Management Model

Public Health Implications:

- 7.9 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:

- 7.10 Inspectors take a risk based approach to intervention planning for both local & national priorities

SUPPORTING DOCUMENTATION

Appendices:

1. Health & Safety Service Plan 2018/2019

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 (rev7)
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

Service Plan 2018-19

Directorate:	Neighbourhoods, Communities and Housing	Service:	Regulatory Services - Health And Safety Team
Responsible Officer:	Nick Wilmot		

Corporate Plan - Priorities	
1	Economy and housing
2	Children and young people
3	Health and wellbeing
4	Community safety & resilience
5	Environmental sustainability

Corporate Plan - Purpose and Ambition (Modernising the Council)	
6	Strong civic leadership
7	Value for money
8	Quality public services
9	Protect the vulnerable
10	A high performing workforce

Service Objectives for 2018/19	
1	To comply with the National Local Authority Enforcement Code
2	
3	
4	
5	
6	

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Key Service deliverables

Service Objective 1:					
Directorate Objective number	Action/deliverable	Due Date	Accountable Lead Officer	Internal /External partners involved	Measure of Success
	Proactive inspection of high risk activities in those sectors specified by HSE or where intelligence suggests risks are not being effectively managed.	31 st March 2019	Nick Wilmot	HSE Fire Brigade Planning Building Control	Inspection of high risk activities in those sectors where intelligence suggests that risks are not being effectively managed.

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Service Objective 2:					
Directorate Objective number	Action/deliverable	Due Date	Accountable Lead Officer	Internal /External partners involved	Measure of Success
	To investigate 150 RIDDOR accident notifications.	31 st March 2019	Nick Wilmot	HSE Police Fire Brigade Planning Building Control	150 RIDDOR notifications investigated.

(To add additional rows position the cursor at the end of a row outside the table and press enter)

Service Objective 3:					
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Directorate Objective number	Action/deliverable	Due Date	Accountable Lead Officer	Internal /External partners involved	Measure of Success
	To investigate 200 complaints of poor working practices/conditions.	31 st March 2019	Nick Wilmot	HSE Police Fire Brigade Planning Building Control	200 complaints investigated.

(To add additional rows position the curser at the end of a row outside the table and press enter)

Subject:	Management of Hove Park 3G Football Facility		
Date of Meeting:	20 March 2018		
Report of:	Executive Director Economy, Environment & Culture		
Contact Officer:	Name:	Robert Walker	Tel: 01273 294349
	Email:	<u>Robert.walker@brighton-hove.gov.uk</u>	
Ward(s) affected:	Hove Park		

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

- 1.1 The report is to enable the ETS Committee to consider the proposal put forward by The Russell Martin Foundation to operate Hove Park's new 3G football area.

2. RECOMMENDATIONS:

- 2.1 That the Committee notes the proposal of the Russell Martin Foundation (Appendix 1) to operate Hove Park's 3G football facility by way of a commercial lease agreement and further notes that this proposal has been advertised by way of an Open Spaces Notice pursuant to s123 (2) (A) of the Local Government Act 1972;
- 2.2 That the Committee delegates authority to the Executive Director of Economy, Environment & Culture, Assistant Director Property & Design and Head of Legal Services to approve detailed lease terms, having taken into consideration any objections or representations received.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The previous sand carpet surface at Hove Park had reached the end of its useable life and had started to disintegrate. It had become unsafe for any sports use. There was no budget available within the Council to finance resurfacing of the area therefore external funding was required. Planning Gain [106] money was available for Hove Park so the decision was made to use this money to change the surface to a 3G football surface. It had previously been a facility used by both football and tennis.
- 3.2 Due to budget reductions Cityparks are reducing the funding going to all sports and are encouraging users to become more involved in running facilities as a way of keeping them going on the reduced budget whilst minimising impact on the sport. In the case of 3G surfaces it is necessary to put a considerable amount of money aside each year to ensure that when the surface does need renewing there is funding to do it. In the case of Hove Park the requirement is £15,000 per

year. As it was unlikely that any of the existing users would be able to take on this sort of financial burden, established football not-for-profit organisations were invited to put forward proposals to run the area.

- 3.3 Only one proposal was put forward from The Russell Martin Foundation who are a registered charity working to impact positively upon the lives of children and young people through sport. The Russell Martin Foundation proposal is attached in Appendix 1.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The Council has the option of running the area using it's own directly employed staff. Historically the Council has failed to operate sustainably within it's budgets as no money has been set aside for replacement of the surface. Policy, Resources and Growth Committee on the 8th February 2018 approved a ring fenced budget that can be used to hold money set aside as a sinking fund to cover this going into the future. To raise sufficient income to maintain the area and put the necessary money into the sinking fund the area will need to be better utilised and managed than it has been.
- 4.2 The Council would not be in a position to give the level of support and help to the range of groups possible with the The Russell Martin Foundation. Details of the scope of the offer are included within their proposal in Appendix 1.
- 4.3 Although it is possible that a Council run facility could cover its costs including a sinking fund, it would not deliver the social and community benefits that a Russell Martin Foundation run facility would.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 General consultation has taken place with tennis and football clubs and representatives and governing bodies about future provision of sports services. This is both in relation to the Council's budget cuts [tennis and football] and the City's Playing Pitch Strategy [football]. The City's Playing Pitch Strategy identifies the need for more 3G surfaces in the City.
- 5.2 Specific consultation took place with tennis users and football users about the change to a 3G surface at Hove Park which was supported by football and opposed by tennis.
- 5.3 The principle football user of facilities in Hove Park is Hove Park Colts. The aspects of the Russell Martin proposal impacting directly on them have been discussed with them and they are happy with the proposal. Russell Martin have liaised directly with a number of other schools and other clubs and have included letters of support from them within their proposal.
- 5.4 Following consultation with The Sussex Football Association on who to approach a number of not for profit organisations operating in the local area were invited to put forward proposals for operating the facility.

6. CONCLUSION

- 6.1 The Russell Martin Foundation are offering a financially sound proposal that will enable the 3G facility at Hove Park to be well utilised, financially sustainable for the Council and cater for a broad range of football users.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The current revenue budgets within CityParks for sports bookings include the income received directly from the users of the Hove Park 3G football facility. As a result of the report recommendations, there will be a loss of income. It is estimated that this would be predominantly offset by the rental income from the proposed lease agreement and a reduction in ongoing revenue costs such as repairs and maintenance. The remaining shortfall will be met from other revenue budgets within CityParks.
- 7.2 The proposed lease agreement includes £15,000 per annum for the sinking fund, agreed by Policy, Resources and Growth committee on 8th February 2018, to pay for future replacement costs of the 3G football facility. This is estimated to be adequate based on an average useful life and current costs; however there is a risk that the pitch may require replacement after a shorter length of time. This risk will remain if the facility continues to be run by council staff.

Finance Officer Consulted: Gemma Jackson

Date: 02/03/18

Legal Implications:

- 7.3 Section 123 of the Local Government Act 1972 ("the Act") provides that a Council may dispose of land in any manner it sees fit subject to the condition that, except in the case of leases for less than 7 years, disposal must be for the best consideration reasonably obtainable. In addition, the Act further provides that an authority may not dispose of open space land until after an open space notice has been advertised and any objections considered. As the land to be disposed of is open space land, the requirements of the Act will be satisfied because this report confirms that the requisite notice has been advertised and that officers will take into account any objections before granting the lease.

Lawyer Consulted: Joanne Dougnaglo

Date: 06/03/2018

Equalities Implications:

- 7.4 None identified

Sustainability Implications:

- 7.5 None identified

SUPPORTING DOCUMENTATION

Appendices:

1. Russell Martin Foundation Proposal

Documents in Members' Rooms

1. None

Background Documents

1. None



RUSSELL MARTIN
FOUNDATION
Inspiring today for tomorrow

APPLICATION TO LET HOVE PARK 3G PITCH



RUSSELL MARTIN
FOUNDATION
Inspiring today for tomorrow

www.russellmartinfoundation.co.uk

+44 (0)1273 591364

info@rmfoundation.co.uk

Bank House | Southwick | West Sussex | BN42 4FN

The Russell Martin Foundation is a Registered Charity No. 1174134

WHO ARE WE?

The Russell Martin Foundation is a registered charity (charity no. 1174134) and a non profit limited company that works to impact positively upon the lives of children and young people through sport, education and opportunity.

RMF focuses on three strands to achieve this.

THE RUSSELL MARTIN ACADEMY

The Russell Martin Foundation Football Development Team consists of our expert officers who oversee the Academy participation strand of the charity.

The Russell Martin Academy supports young people aged 5-19 year, providing opportunities for players of all abilities to maximise their potential through a range of different training, challenges and activities.

RMA provides an array of football services, from Professional Development Centres and Elite sessions supporting a clear competitive pathway to recreational opportunities such as our primary schools football programme, holiday courses and utilisation of our Street Mark accreditation in partnership with StreetGames UK.

All of our Russell Martin Academy provision sets a standard of expert coach delivery ensuring that appropriate FA Level 1, FA Level 2, FA Level 3/UEFA B and UEFA A Licensed Coaches are appropriately utilised across all provision.



RM EDUCATION & TRAINING

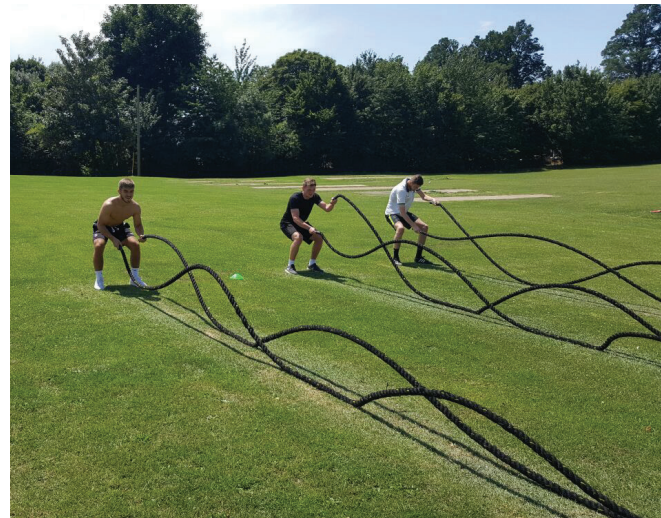
Committed to the development of creating future community role models and supporting local enterprise through opportunities provided to 11-25 year olds. This is achieved through a variety of different initiatives such as our Youth Legacy Team and young Coach Development Programme.



RM HEALTH & FITNESS

Programmes and initiatives targeting an array of challenges faced by young people, such as employability, active lifestyles, nutrition, mental health and drug awareness.

The Russell Martin Foundation are dedicated to supporting young people with Mental Health support through the delivery of bespoke training opportunities. RMF offer two Mental Health support workshops specifically designed to address mental health awareness in sport. On top of this RMF run a disability fitness and wellbeing programme.



RMF, through its various programmes and initiatives comes into contact with well over 700 children and young adults a week from the local community. This number continues to grow and will increase even further with a 3G pitch facility to help run other initiatives and programmes which will improve our inclusion and in turn the diversity of the organisation.

WHY DO WE WANT THE HOVE PARK 3G FACILITY?

We see Hove Park as an ideal base to grow our football and sporting provision. We see the facility as a key location to support a number of new initiatives to bring an active lifestyle to a much wider and diverse community.

As well as supporting the local community by providing them with a professional service, a well maintained and looked after facility we would also like to offer more provision and delivery in the below areas.

- Girls/Woman Football
- Local Grassroots Football
- Football Therapy
- Disability Football
- Walking Football
- Primary School Football
- Health and Well Being sessions
- Local player pathway and exit routes
- Talented players pathway

HOW DO WE PLAN TO ACHIEVE THIS VISION?

Girls/Women Football – We see Hove Park as a perfect base to engage and welcome more female participants to football. Our aim is to encourage more girls to participate in football outside of school.



Below are some of the plans that Hove Park 3G will allow us to implement:

- Introduction of new Wild Cats centre in line with the Sussex FA's long term development plans. RMF have already been accepted for this.
- Introduction of "Mums can play" session. This is a free session that runs alongside our girl's sessions and encourages mums to get together for an activity while their daughters play football.
- Introduction of New Year 5/6 schools league with the Hove Park 3G being the central hub for these games. This would allow schools with limited facilities the opportunity to compete and offer school football to more girls.
- Girl's mini festivals which allows local clubs to compete and offer more girls the opportunity to play locally.

Local Grassroots Football – The basis of the Russell Martin Foundation is spawned by the values of grassroots and local football. Our passion is to offer as many players opportunity to play and part of this is to support them in finding local clubs.

We also look to support local clubs by offering our knowledge and experience. Our Young Coaches Development Programme is designed to support young coaches develop and support them on their journey into coaching at grassroots clubs and beyond.

Hove Park 3G pitch will be a facility that can be utilised by clubs local to Hove Park and the surrounding areas.



Hove Park Colts

- HPC have a long standing history at the venue and we acknowledge this and would honour their requirements to allow them to bring all their age groups back to the area.
- In addition we would look to support their plans for growth with first refusal on additional bookings they may require to grow their girl's provision.
- HPC's will also be given first option on using the facility for their fixtures on Sunday mornings



Mile Oak Wanderers

- MOW are a large club with a large number of boy's teams and a number of girl's teams who currently struggle for facilities so Hove Park would be a good opportunity to support their training needs.



Hangleton Rangers

- Hangleton Rangers is another large local club that is currently struggling for facilities. The recent announcement of the loss of their mini soccer pitches has given them a need for a new home for fixtures. Hove Park could be utilised to support this need.

Exit Routes – We actively encourage players at our drop in sessions, academy sessions, school sessions and girl's sessions to try grassroots football at local clubs. We help facilitate this with clubs local to them. All of the above clubs would benefit from this particularly Hove Park Colts.

Mini Soccer Festivals will give more teams the opportunity to compete and give more players the opportunity to play. At present the current regulated league set ups can only offer a limited amount of play to a limited number of players. Our mini festivals will ensure a larger number of young players have the opportunity to play.

Grassroots CPD Events will be created to support the development of local coaches. We plan to launch a "Community Club Programme" which offers advice and guidance to coaches, delivery to local teams as well as best practice meetings between clubs. Hove Park 3G would be an ideal location for the practical side of this programme.

Football Therapy – Taken from the successful Lewes FC model we would look to create an identical platform for players with mental health conditions to play football. This session would be supported by a qualified coach and a qualified support worker.

Disability Football – We aim to create a drop in session for both young and senior players across the disability spectrum. Our Health and Well Being Officer Ben Morris is already making very good progress in this sector and recently became an ambassador for the Sussex FA Disability League.



Below are some of the plans that Hove Park 3G will allow us to implement:

- RMF and other organisations Disability sessions
- Start-up of our first RMF Disability team for both Junior and Senior age groups
- Introduction of a regular disability league to run in line and accordance to the successful league run by Sussex FA.

Walking Football – Time within the regular time table would be set aside to run a daytime and evening walking football session with the longer aim being to create teams who can then compete against each other locally.

Primary School Football – This is an area within Football that we feel currently needs more support from local organisations such as ourselves in regards to helping provide local schools with a suitable facility to play fixtures. We also see this as an area that can be better supported to encourage a more inclusive and better opportunity for players to take advantage of regardless of ability. We feel that our expertise can be transferred to support teachers to better guide and manage school teams to the benefit of all the children's development.



Below are some of the plans that Hove Park 3G facility will allow us to implement:

- Support to local schools for fixtures such as Bilingual and Cottesmore
- The introduction of a new schools league and cups for both boys and girls. This league would be regulated and facilitated by RMF staff to ensure that schools get biggest benefit possible.
- School sports days for schools like Bilingual who have limited facilities.
- CPD events for school teachers offering guidance in delivering activity based lessons

Health and Well Being Sessions – Our Health and wellbeing provision is designed to support and promote new and innovative ways to help guide less active groups towards a healthier lifestyle. Our Health and Well Being Officer Ben Morris is currently partaking in a specialised course to support the recovery of cancer patients in their journey back to health. Hove Park 3G will offer us the opportunity to run these sessions.

Ben has also expressed a desire to run sessions for the homeless to support them with a place to engage.

Local Player Pathway – Hove Park 3G will not only offer RMF and local teams a facility to enhance their ability to deliver developing sessions; it will also offer the opportunity for local players of all ages the option to book the facility to train or play on an ad-hoc basis.

Through the network of sessions run by RMF and local teams these players will have the opportunity to find a local club or session that suits. RMF are committed to engaging younger players at our Saturday drop in session and helping to develop and find local grassroots clubs.



Talented Players Pathway - As well as the grassroots pathway our prestigious Academy (RMA) not only offers all players the chance to improve but also offers talented players the opportunity to progress into our Elite and PDC sessions with the end goal being a pathway into professional football club academies.

RMF are proud to be able to offer boys and girls a pathway that takes them from 5 years old through to College placements and eventually University.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	
09.00	External Hire or Community Use	External Hire or Community Use	External Hire or Community Use	External Hire or Community Use	External Hire or Community Use	RMF Saturday Soccer Drop in KS1 + KS2	Grassroots Mini Soccer Fixtures (Hove Park Colts Priority Booking)	
10.00	Used by RMF College Programme	Used by RMF College Programme	Active Body Boot Camp	Football Therapy	Used by RMF College Programme			Hove Park Colts Wild Cats (Girls)
11.00			Active Body Boot Camp (OAP)					
12.00			Disability Boot Camp					
13.00	Primary & Secondary School PE & Sports Activity	Primary & Secondary School PE & Sports Activity	Pitch Maintenance	Primary & Secondary School PE & Sports Activity	Primary & Secondary School PE & Sports Activity	Mid Sussex League Mini Soccer Festivals	RMF Disability League	
14.00								
15.00	Primary School League and Cup (Boys)	Primary School League and Cup (Boys)	Disability Football (Youth)	Primary School League & Cup (Girls)	Bilingual After School Football Club	External Hire or Community Use	Pitch Maintenance	
16.00	RMF Wild Cats Centre (Girls)	Grassroots Hire Hove Park Colts			Disability Football (Adults)			Walking Football
18.00	External Hire or Community Use	Grassroots Hire Hove Park Colts	RMF Elite/PDF Centre U9-U16	Grassroots Hire Hove Park Colts	RMF Development Centre U7-U9		External Hire or Community Use	External Hire or Community Use
19.00					Grassroots Hire			
20.00		External Hire or Community Use	External Hire or Community Use	External Hire or Community Use	External Hire or Community Use			
21.00								
22.00	Closed	Closed	Closed	Closed	Closed			

* This timetable acts as an example of a proposed schedule

Hire Fees

Proposed hire fees per area per hour for different types of user:

Peak Time 17.00-22.00		
Full Pitch	£70	Per Hour
2/3 Pitch	£50	Per Hour
1/3 Pitch	£25	Per Hour

Off-Peak 09.00-17.00		
Full Pitch	£50	Per Hour
2/3 Pitch	£35	Per Hour
1/3 Pitch	£20	Per Hour

School Hire 09.00-17.00		
Full Pitch	£50	Per Hour
2/3 Pitch	£30	Per Hour
1/3 Pitch	£20	Per Hour

Internal Hire (RMF) 09.00-22.00		
Full Pitch	£40	Per Hour
2/3 Pitch	£20	Per Hour
1/3 Pitch	£10	Per Hour

Mini School Fixtures 09.00-17.00 (Sunday)		
1x 5v5 Pitch	£20	Per Hour
2x 5v5 Pitch	£35	Per Hour
1x 7v7 Pitch	£40	Per Hour

Hove Park Colts/Grassroots Hire			
	Peak	Off-Peak	
Full Pitch	£60	£45	Per Hour
2/3 Pitch	£40	£30	Per Hour
1/3 Pitch	£20	£15	Per Hour

****This rate will only be applied to clubs with standard chartered status****

Concession rates can be negotiated based upon length of booking.

Russell Martin Foundation Staff:

Founder and Chair of Trustees	Russell Martin
Head of Operations and Business Development	Gary Mansell
HR Administration and Safeguarding Officer	Donna Cox
Head of Finance	Paul Snelling
Senior Football Development Officer	Sergio Torres
Football and Education Programme Manager	Jay Lovett
Girls Football Development Manager	Georgia Bridges
Schools Sport Officer	Harry Shooman
Physical Activity and Well-being Officer	Ben Morris
Head of Marketing	Stuart McDonald
Sport and Activity Officer	Matt Lindner
Head of Communications	Jamie Martin
Youth Legacy Team Leader	Beth Garner



Please see diagram, next page, of the staff structure.

The organisation is run day to day by its full time staff who report into Gary Mansell the head of operations. Gary sends a monthly report to Russell Martin who he is in regular contact with. This information is stored and discussed during the Trustees meeting held once every three months.

**During a recent skills audit of the organisation's staff and Trustees it was decided that RMF would like to have more diversity on its board of Trustees and the board along with Gary Mansell are currently discussing options for personnel to welcome onto the board. The options being discussed include female, disabled and BAME personnel and will be proposed as candidates to join the board of Trustees at the next meeting where once agreed we look forward to welcoming them into RMF. They will add huge personal experience for our staff and participants and will help us improve as an organisation.*

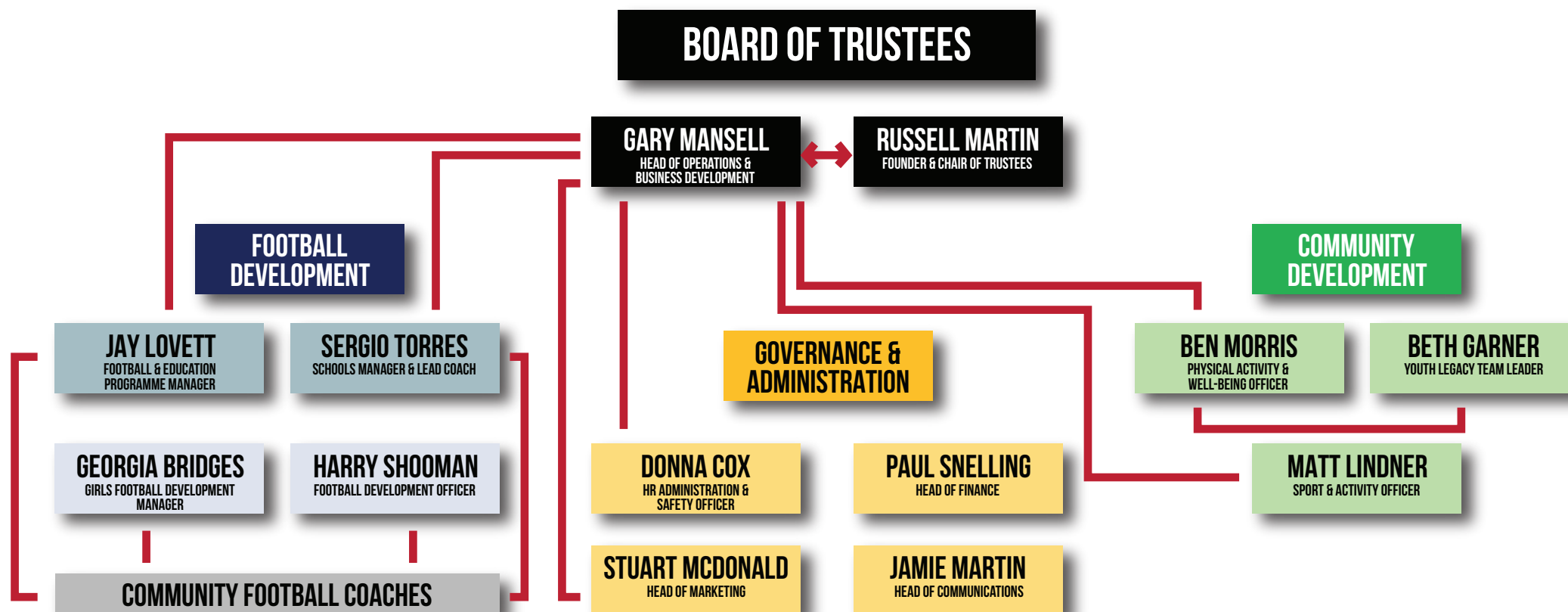
For RMF Safeguarding, Disability, Health and safety policy and Procedures please see Appendix.

The Russell Martin Foundation's diversity policy (Appendix 3) will work in line with the council's equalities requirements to make sure these requirements are met. The 3G facility will be a facility that is going to be available for the whole community. RMF will encourage usage from old and young, male and female, disabled and not, BAME and disadvantaged people. All of these groups of people attend various different sessions that RMF offer.

To add to our existing sessions and provisions we are currently in the process of agreeing to train and manage two disabled football teams (one youth and one adult) to represent RMF in the Sussex Disability Football League.

We are also looking to attain funding for walking football sessions for over 40's. Once we are able to run the session and have a facility we will welcome lots of our child participants' parents and grandparents who have made enquiries about when these sessions will start.

We have lots of players who come from all different backgrounds and ethnicities and this will continue through our community programmes (Holiday courses etc) where a number of free courses are offered and discounts given to people who might not be able to afford or haven't been to any of our sessions before and would like to see what is on offer at RMF.



How will we manage the Facility?

RMF are in the process of building a bespoke booking system to better support the needs of our services as well as the ability to manage the new facility should our application be approved. Until this system is complete our website will provide the perfect platform to take long term and ad-hoc bookings.

The below guide will form the basis of this process:

- Search engines for Hove Park 3G will be directed to our RMF website
- Customers will be able to view a weekly updated timetable of the facility usage.
- Once the customer has decided which slots they'd like they can make contact through our contact page or contact us by phone.
- Single or short term bookings can be paid for over the phone or through a link provided by our bookings manager.
- Long term and repeat bookings can be invoiced by our automated banking system.
- All hirers will be sent a terms and conditions document upon booking. This document will include information such as correct footwear, facility guidance (putting goals away, not leaving them on the wheels) as well as booking info and terms for cancellations.

How will we maintain the Facility?

RMF will seek to employ two new members of staff to manage the facility. These members of staff will ensure that routine maintenance is performed, logged and recorded in accordance to the recommended maintenance plan set by the approved facility build contractors.

The roles will consist of:

- 1x Facilities manager and 1x Facilities officer

This team will be responsible for the below duties:

- Opening and closing of the facility
- Regular maintenance and brushing of the pitch
- Overseeing of non-attended sessions by RMF or trusted parties
- Upkeep of signage and surrounding area of pitch
- Regular maintenance to all goals, equipment and fixings
- Liaising with the bookings manager to ensure suitable time is given to maintain the pitch
- Liaising with the outside service contractors to redistribute the rubber and other service requirements.

How will the Finances be managed?

RMF will ensure that the facility has a long term future and ensure the annual rental charges and sink funds are met. We would do this by ensuring that all hours of usage are charged. Every hour that adds to the wear of the facility should carry a charge that contributes towards the sink fund. This will include all school, club and RMF usage.

The Development plan for the facility will be carefully shaped to ensure that grassroots football will continue to be governed and developed, whilst offering access to a first class facility to our local partners & their programmes, our local clubs, leagues, volunteers and the general community, whilst also acting as a base for two new members of our RMF Workforce who will be employed to manage and develop the facility.

We can confirm that we have consulted a solicitor and fully understand the terms of the lease on offer, as described in the marketing particulars.

Rental Offer

Russell Martin Foundation would like to offer Brighton and Hove City Council the sum of TWENTY ONE THOUSAND POUNDS PAX (Rental £6,000 PAX + Non - negotiable Reserve Fund Charge £15,000 PA).

RMF are prepared to pay a minimum of a three month rent deposit.

Conclusion

The facility will enable the Russell Martin Foundation to offer the following:

- Affordable high quality training and match facilities for our local affiliated clubs
- Various Workforce Education Courses for local volunteers
- Small Sided Football opportunities for adults old and young
- Festivals of Football for all ages
- Engagement Programmes for 14-25 year olds via Our Youth Legacy Team and Young Coaches Development Plan.
- Act as a training base for its 6th Form Football Education programme allowing training all year round
- High quality curricular and extra-curricular sport activities for local school pupils all year round.
- Further develop it's young leadership programme and engage with local primary schools to access the facility for local football / sport festivals / Schools leagues.

The facility will also act as a key base for the following organisations;

- Hove Park Colts FC
- Mile Oak Wanderers FC
- Hangleton Rangers FC
- Cottesmore school
- Bilingual School



This 3G pitch will be a facility that the project partners, football clubs and the local community can be extremely proud of. It will be fully utilised 7 days a week, all year round and will assist in promoting a healthy active lifestyle to thousands of individuals on an annual basis.

The sustainability of this facility is a key factor for all project partners and the business plan will reflect how this will be achieved.

We truly hope that Brighton and Hove City Council looks favourably on RMF to manage this facility to enable our vision to become reality.



**Stuart Berry
Club Secretary
Mile Oak Wanderers FC**

44 Truleigh Drive

Mile Oak

Portslade

BN41 2YQ

T: 07971 438641

E: Club.Secretary.Mow@Outlook.com

WWW.MILEOAKWANDERERS.CO.UK

Twitter: @MOWFC

RE: Russell Martin Academy & Hove Park 3G pitch

To Whom It May Concern:

Mile Oak Wanderers FC have had a long standing relationship with the Russell Martin Academy (RMA) since its inception and we would support them fully with regards to having control of the 3G pitch at Hove Park.

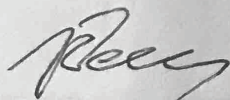
As an organisation RMA have constantly shown a high standard in all areas of its business, be it in the running of their Academy, Professional Development Centres, Education & Training and their Health Fitness programs.

With RMA running the 3G pitch at Hove Park the use of it would be put to its full potential increasing its usage and would be a great asset for the Brighton and Hove City in that it would be a positive for the City with regards to its own Active for Life programs by enabling more young people to become fit and active.

In addition to the RMA, the Russell Martin Foundation (RMF) is also another asset and great benefit to the people of our City. The RMF ensures that football is not an exclusive activity for the few but for all and in addition to this the RMF is ensuring that they create a positive legacy for the youth of our city for the future.

As a club with nearly 350 players signed on we can understand how important it is for a project like this to be run in the proper and correct way and at Mile Oak Wanderers FC we know that this is something that RMA would excel at.

Should you have any questions regarding this letter of endorsement please do not hesitate to contact me and I will be happy to be of assistance.



Stuart Berry
Club Secretary
Mile Oak Wanderers FC



**NIKE
PARTNER
CLUB**





Cottesmore St. Mary
Catholic Primary School
THE DIOCESE OF ARUNDEL AND BRIGHTON



Headteacher: Rachel Breen Acting Headteacher: Mrs Rachel Kershaw

9th February 2018

RE: Russell Martin Academy & Hove Park 3G Pitch

To Whom it may concern,

I am writing with regards to the proposal that the Russell Martin Academy have put in to have full control of the 3G pitch at Hove Park.

RMA have been working towards improving our extra curricular sports activity within our school for the past two years. In addition to running highly successful after school clubs, RMA have inspired many of our children to join their football academy sessions as well as encouraging our children to join their holiday clubs. We are currently working alongside each other to create an annual football tournament for schools within Brighton and Hove.

Having Access to a high quality 3G surface pitch will benefit not only our school, but many of the schools within Brighton and Hove that RMA are currently working with.

Primary school sport has had major investment from the government over the past few years to enable children from a young age to have access to high quality coaching, equipment and facilities.

If RMA were to have control of this pitch it would enable schools like ours to have access for teaching P.E lessons, playing fixtures and organising more regular intra and inter school sporting events.

Having worked alongside many of the RMA coaches over the past two years, and knowing the Football Development manager very well, I fully recommend that this facility is given to the Russell Martin Academy to use and help to develop sport further within our City. Their dedicated, reliable staff will ensure that primary schools will have regular access to the high quality coaching, equipment and facilities that the government are looking for.

Yours Sincerely,

Johnny Buggy
Cottesmore St Mary P.E Specialist
Cardio Kids Managing Director



The Upper Drive, Hove, BN3 6NB Tel: (01273) 555811 Fax: (01273) 555423



Hove Park Colts
26 Matlock Road
Brighton
BN1 5BF

Mr G Mansell
Russell Martin Foundation
Bank House
Southwick
West Sussex
BN42 4FN

8 February 2018

Dear Gary

Hove Park 3G

Further to our meeting and subsequent telephone conversation I would like to give the Russell Martin Foundation my full backing in their application to run the 3G facility at Hove Park.

As existing long-term users we would like to continue with and possibly expand upon our Tuesday and Thursday bookings. In addition we would also like to book an hour on a Saturday morning to run our FA Wildcats Centre and to look at hiring the 5v5 on a Sunday mornings during the playing season for our U7 and U8 teams.

I think that this will be an exciting addition to the park and will benefit the whole community.

I wish you luck with your application and look forward to working with you in the future.

Yours sincerely

A handwritten signature in black ink, appearing to read "Mark Sessions", with a long horizontal line extending to the left.

Mark Sessions
Chairman
Hove Park Colts

To whom it may concern,

As a committee member of the Mid Sussex Youth & Minor Football League I am delighted in recommending Gary Mansell and Russell Martin Foundation.

Gary and RMF have worked with myself and committee members in the delivery of an exciting project for children in Sussex aged 6-11 years old.

We have found Gary and RMF to be extremely professional and pro active in their business approach. As a league we have been expanding our Futsal development program for children in the Sussex community and RMF were pro active in offering assistance in the project and helping us find good solutions for its delivery.

RMF negotiated quality facilities for the league to use and have recruited a team of qualified technical coaches to support the training and activity for the children.

Gary Mansell also developed a training program to introduce young children to the complex rules and hi tempo game helping the league with its objective of Sussex competing at a national level in this format.

The feedback from the Coaches and Parents has been excellent and its evident on the day how much the children are enjoying the experience.

We are currently on track to have offered this experience to nearly 400 children this season.

The service delivered has been excellent and delivered in a professional and helpful manner, Gary Mansell has helped in the creation of documentation for the project.

Gary managed the start up of the Shoreham based project, making sure the right equipment and people were in place, the delivery has been seamless.

RMF have further more improved the service by offering a small and discerning catering service offering traveling parents a well earned hot or cold drink.

As a league endorsed by Sussex FA it has been important that RMF were able to deliver a service aligned with our safeguarding children criteria,

Having delivered a high quality project we are now seeing growth and more potential and will reach out to RMF for support as this develops.

Yours Sincerely

Gary Emney

Mini Soccer Co-ordinator

Mid Sussex Youth & Minor Football League



**MID SUSSEX YOUTH & MINOR
FOOTBALL LEAGUE**



The Droveaway
Hove
BN3 7QA
01273 916212

info@bilingualprimaryschool.org.uk

Wednesday 7th February 2018

To whom it may concern

The Bilingual Primary School has been working with the Russel Martin Academy for the past 18 months.

As we have very limited playground facilities, they have coordinated an after school football club for us in the local park, and have helped facilitate our school football team.

Throughout we have been impressed with their professionalism and organisation. I am confident that they would bring these skills and expertise to manage the new facility.

Wendy King

Head teacher



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SAFEGUARDING CHILDREN POLICY AND PROCEDURES



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The Russell Martin Foundation is a Registered Charity No. 1174134

1) The Russell Martin Foundation acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment for all members. A child or young person is anyone under the age of 18 engaged in any Russell Martin Foundation activity. We subscribe to The Football Association's (The FA) Safeguarding Children – Policy and Procedures and endorse and adopt the Policy Statement contained in that document.

2) The key principles of the Russell Martin Foundation Safeguarding Children Policy are that:

- the child's welfare is, and must always be, the paramount consideration all children and young people have a right to be protected from abuse regardless of their age, gender, disability, race, sexual orientation, faith or belief.
- all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately working in partnership with other organisations, children and young people and their parents/carers is essential.

We acknowledge that every child or young person who plays or participates in activity should be able to take part in an enjoyable and safe environment, protected from poor practice and abuse. The Russell Martin Foundation recognises that this is the responsibility of every adult involved in our organisation.

3) The Russell Martin Foundation has a role to play in safeguarding the welfare of all children and young people by protecting them from physical, sexual or emotional harm and from neglect or bullying. It is noted and accepted that The Football Association's Safeguarding Children Regulations applies to everyone in football whether in a paid or voluntary capacity. This applies whether you are a representative of the Russell Martin Foundation as a volunteer, coach, trustee, full-time/part-time member of staff or associate partner of the charity.

4) We endorse and adopt The FA's Responsible Recruitment guidelines for recruiting Russell Martin Foundation staff and volunteers, we will:

- Specify what the role is and what tasks it involves
- Request identification documents
- As a minimum meet and chat with the applicant(s) and where possible interview people before appointing them
- Ask for and follow up with 2 references before appointing someone
- Require an FA CRC Enhanced Disclosure where appropriate in line with FA policy.

All current Russell Martin Foundation members who are regularly caring for, supervising, training or being in sole charge of children and young people will be required to complete a CRC Enhanced Disclosure via The FA CRC Unit.

If there are concerns regarding the appropriateness of an individual who is already involved or who has approached us to become part of the Russell Martin Foundation guidance will be sought from The Football Association. It is noted and accepted that The FA will consider the relevance and significance of the information obtained via The FA CRB Unit Enhanced Disclosure and that all decisions will be made in the best interests of children and young people.

It is accepted that the Russell Martin Foundation aims to prevent people with a history of relevant and significant offending from having contact with children or young people and the opportunity to influence policies or practice with children or young people. This is to prevent direct sexual or physical harm to children and to minimise the risk of 'grooming' within our services.

5) The Russell Martin Foundation supports The FA's Whistle blowing Policy. Any adult or young person with concerns about a colleague can 'whistle blow' by contacting The FA Safeguarding Team on 0844 980 8200 4787, by writing to The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966, London SW10 9EQ or alternatively by going direct to the Police, Children's Social Care or the NSPCC. The Russell Martin Foundation encourages everyone to know about it and utilise it if necessary.

6) The Russell Martin Foundation has appointed Donna Cox, as the organisation's Welfare Officer in line with The FA's role profile and required completion of the Safeguarding Children and Welfare Officers Workshop. The post holder will be involved with Welfare Officer training provided by The FA and/or County FA. Donna Cox is the first point of contact for all Russell Martin Foundation members regarding concerns about the welfare of any child or young person. Donna Cox will liaise directly with the County FA (CFA) Welfare Officer and will be familiar with the procedures for referring any concerns. Donna will also play a proactive role in increasing awareness of Respect, poor practice and abuse amongst Russell Martin Foundation members.

7) We acknowledge and endorse The FA's identification of bullying as a category of abuse. Bullying of any kind is not acceptable at the Russell Martin Foundation. If bullying does occur, all players, staff, volunteers, trustees or associate partners should be able to tell and know that incidents will be dealt with promptly. Incidents need to be reported to Donna Cox, Welfare Officer and in cases of serious bullying the Sussex County FA Welfare Officer may be contacted to seek further guidance.

8) Respect codes of conduct for participants, parents/spectators, staff, volunteers, trustees and associate partners have been implemented by the Russell Martin Foundation. To validate these Respect codes of conduct the Russell Martin Foundation has clear actions it will take regarding repeated or serious misconduct and acknowledges the possibility of potential sanctions which may be implemented by the Russell Martin Foundation in more serious circumstances.

9) Reporting your concerns about the welfare of a child or young person. Safeguarding is everyone's responsibility, if you are worried about a child it is important that you report your concerns – no action is not an option.

i. If you are worried about a child then you need to report your concerns to the Russell Martin Foundation Welfare Officer.

ii. If the issue is one of poor practice the Russell Martin Foundation Welfare Officer will either:

- deal with the matter themselves or
- seek advice from the Sussex County FA Welfare Officer

iii. If the concern is more serious – possible child abuse, where possible, contact the Sussex County FA Welfare Officer first, then immediately contact the Police or Children's Social Care.

iv. If the child needs immediate medical treatment take them to a hospital or call an ambulance and tell them this is a child protection concern. Let the Russell Martin Foundation Welfare Officer know what action you have taken, they in turn will inform the Sussex County FA Welfare Officer.

v. If at any time, you are not able to contact the Russell Martin Foundation Welfare Officer or the matter is clearly serious then you can either:

- contact the Sussex County FA Welfare Officer directly
- contact the Police or Children's Social Care
- call the NSPCC 24 hour Helpline for advice on 0808 800 5000 or text 88858 or email help@nspcc.org.uk

NB – The FA's Safeguarding Children Policy and Procedures are available via www.TheFA.com/Footballsafe – click on the 'downloads' under Policy and Procedures. The policy outlines in detail what to do if you are concerned about the welfare of a child and includes flow diagrams which describe this process. How to make a referral is also covered in the Safeguarding Children workshop. Participants are given the opportunity to discuss how this feels and how best they can prepare themselves to deal with such a situation. For more information on this workshop contact the Sussex County FA Welfare Officer.

10) Further advice on Safeguarding Children matters can be obtained from:

- Donna Cox, Russell Martin Foundation Welfare Officer

T: 01273 591 364

E: Donna.Cox@rmfoundation.co.uk

- Sandra Redhead, Sussex County Football Association's Welfare Officer

T: 01903 766855

E: Sandra.redhead@sussexfa.com

- www.TheFA.com/Footballsafe

- Emailing – Footballsafe@TheFA.com

- The FA Safeguarding Children general enquiry line 0845 210 8080



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DISABILITY POLICY



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Foundation Disability Policy

The requirements of job applicants and existing members of staff who have a disability will be reviewed to ensure that wherever possible reasonable adjustments are made to enable them to perform as well as possible during the recruitment process and while employed by the organisation. Opportunities for promotion, access to benefits and facilities of employment will not be unreasonably limited and all reasonable adjustments will be made.

Working with Participants with Disabilities & Vulnerable Adults Coaches must:

- Respect the rights, dignity and worth of each participant regardless of disability
- Be aware that instructions may need to be repeated or rephrased, particularly if the case of younger participants
- Ensure that knowledge of all relevant disability related issues is up to date
- Develop an appropriate working relationship with each participant by ensuring that good lines of communication are established with the disabled person and/or parent/carer
- Exert no undue influence in encouraging participation
- Support and guide participants to their full potential
- Ensure that all activities are appropriate to the individual's abilities to communicate with the disabled person and/or parent/carer to establish capabilities
- Ensure awareness of medical needs by communication with the disabled person and/or parent/carer
- Ensure awareness of physical/mental capabilities by communication with the disabled person and/or parent/carer, but don't make assumptions about the limitation of a participant
- Consistently display high standards of behaviour and appearance
- Always use common sense judgement when planning sessions

The correct ratios of staff according to disability must be strictly adhered to.



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HEALTH & SAFETY POLICY



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Foundation Health and Safety Policy

Near miss - A near miss is an unplanned event that does not result in injury, illness or damage, but has a potential to do so. Near miss reporting is vitally important to prevent serious incidents.

Unsafe Working Conditions - an unsafe working condition is not an incident but area or equipment which is not suitable for safe working. It could be something as simple as a broken office chair or a trip hazard.

Environmental concerns - an environmental concern deals with the management and storage of chemicals and substances as well as refuse and containers. These could be any number of cleaning products, fuel, gases or refuse skips.

If you have any concerns in this area please report them.

General Safety during Coaching Sessions

The Charity aims to provide quality coaching sessions, through a safe, fun learning environment with qualified members of staff. During all coaching, teaching and delivery of the Charity's programmes coaches and delivery staff must adhere to the following:

- Participants must be grouped within 2 year age banding if playing sport competitively
- Coaches must not play or demonstrate against a participant
- The Charity's coaches follow the Charity Safeguarding Policy and procedures
- First aid equipment must be available at all times
- Registers, signing in / out sheets and telephone numbers must be available at all times
- Risk assessments must be completed for all venues before use
- Equipment must be checked at the start of every session
- Playing area must be checked at the start of every session
- Goalposts or other sports equipment must be checked, and staked at all times where appropriate, in accordance with FA Goalpost Safety Guidelines at the start of every session
- Safety mats must be checked prior to the start of sessions and used when appropriate All coaches must adhere to the Charity codes of conduct

In the event of an accident please follow the accident report procedures, which is to complete an accident report form, completing all the relevant information. This document needs to be handed into the RMF Operations team within 48hrs of the accident taking place.

Coaching Ratios

- Maximum of 16 participants to 1 coach. (This differs on a range of RMF projects).
- These may be lower dependant on the age or ability of the participants or higher in a school environment
- Minimum two coaches / supervisory staff should be in attendance at all times in a school environment
- Where possible each activity will have a coaching assistant

Toilet Procedures

- Participants should be encouraged to use the toilet during natural breaks in the activities or prior to the coaching session
- Participants (under 16) must not be allowed to leave the practice area to go to the toilet alone. Only when under the supervision of the head or assistant coach
- Coaches on activities must ask the coaching assistant to take the participants (under 16) to the toilet if a break is not available
- School policies must be adhered to.

Weather Procedures

The Charity will provide an alternative wet weather plan dependant on the facility used Coaches' discretion must be used to determine if playing surfaces are unplayable:

- No activity may take place during thunder or lightning
- If a sports hall is available, coaches will continue with a limited programme
- If a sports hall isn't available, the coaches will organise indoor activities from the wet weather pack i.e. a quiz or competitions within the classroom or changing area
- Participants are advised to bring drinks to all sessions however if necessary cold drinks will be available to the participants in hot weather where possible
- Coach will ensure that participants are suitably dressed for the weather conditions. Parents / participants are informed of the clothing to provide on all activities.
- Coaches are not permitted to apply sun cream on children

Missing Person Procedure

Should a member of staff or parent report a participant missing the following procedures must be adhered to:

- Any missing participants must be reported to the head coach or supervisor at the appropriate venue. Inform the Operations Manager. Check register to ensure the participant was present.
- Head coach / supervisors will then begin a structured search of the site for no more than 15 minutes.
- Operations Manager and/or Director to be informed by telephone and asked to contact parents.
- If the participant's whereabouts are still not known after 20 minutes, it is the responsibility of the Operations Manager and/or Director to contact the police.
- If an accident has occurred, please complete an Accident Report Form and document on an Incident Report Form.

Visitors Policy

All visitors must adhere to the following guidelines to ensure the safety of all participants and staff:

- RMF staff should wear their staff ID badges at all times (where appropriate when coaching).

RMF Staff

- To be responsible for their own safety and must not do anything which is likely to cause injury or risks to the health and safety of other persons: Failure to do so could result in disciplinary action being taken
- To observe all safety rules, signs and safety equipment instructions at all times; when using substances in the course of their work use, handle and store them in the prescribed manner. Any new substances to be used must be reported to their Senior Manager if information has not been provided as to the hazards and precautions relating to such substances

- To wear and use appropriate personal protective equipment and safety clothing and equipment when required
- To act on all reasonable instructions given by persons responsible for health and safety matters
- To report and record all accidents or near-miss occurrences, which may or may not involve injury to persons or damage to property or equipment, immediately to their Senior Manager
- To report all potential hazards to their Senior Manager
- To ensure that any item of equipment not functioning in the correct manner is reported to their Senior Manager; to report any work situation which might present a serious or imminent danger
- Coaches on activities must ask the coaching assistant to take the participants (under 16) to the toilet if a break is not available
- School policies must be adhered to

Assessments for Consideration

Separate Risk Assessments will take place when circumstances dictate changes in procedures or employment of:

- The awareness of pregnant women and new mothers
- The placement within the organisation of a young person who has not attained the age of 18
- These assessments will take place to ensure compliance with Health & Safety at Work Regulations.

Foundation Equality & Diversity Policy

- The Charity derives the following definitions, which appear in the Equality & Diversity Policy statement from the relevant equal opportunities legislation.

Direct Discrimination

When a person or group is treated less favourably, directly, because of a personal characteristic, such as, race, gender, disability, religion, age or sexual orientation.

Indirect Discrimination

Where a criterion, policy, procedure, practice or condition, which applies equally to everyone has the effect of disadvantaging people from a particular group and cannot be justified.

Institutional Discrimination

Is where, for example, an organisation's processes, procedures, attitudes, behaviours or organisational structures, through unwitting prejudice, ignorance, thoughtlessness and stereotyping, amount to less favourable treatment.

Harassment

Is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment having regard to all the circumstances and the perception of the victim; harassment can include behaviour that is offensive, frightening or in any way distressing.

It may be intentional bullying which is obvious or violent, but it can also be unintentional or subtle and insidious. It may involve behaviour, which may not be intended to be malicious but nevertheless is upsetting. It may be about the individual's personal identity or it may be about the identity of those with whom the individual associates.

Victimisation

Is when an individual is treated detrimentally because they have made a complaint or intend to make a complaint about discrimination or harassment or have given evidence or intend to give evidence relating to a complaint about discrimination or harassment.

Foundation Health and Well-being Policy

This policy provides an overview of the promotion of Health and Well-Being and is intended to:

- Empower candidates and staff to actively influence their lives and their living conditions.
- Provide the basis for the detailed work being carried out to develop and strengthen capacity as a healthy setting for living, learning and working.
- Offer learners and staff an indication of what provision is made for its learners in providing integrated and positive experiences and structures, which promote and protect their health.
- Create an ethos of care, respect, participation, responsibility and fairness for all.
- Offer a context and support for monitoring and evaluating.
- Principles - The promotion of Health and Well-Being has been devised to meet learners' and society's needs.

The Promotion of Health and Well-being

Promotes the physical, mental, social, spiritual and emotional health and well-being of all learners and staff. Works with others in identifying and meeting the health needs of the Foundation and its wider community. Encourages a sense of belonging and promotes self-esteem and respect among all students and staff. Provides coherent, effective working procedures that are well understood and accepted by pupils and staff. Improves the environment, resources and facilities of the Foundation. Changes to the Health and Well-Being policy will be based on well-considered rationale, involving consultation with staff, trustees and monitored and evaluated for positive outcomes.

Subject:	2018/19 Local Transport Plan Capital Programme		
Date of Meeting:	20 March 2018 – Environment, Transport & Sustainability Committee		
	29 March 2018 – Policy, Resources & Growth Committee		
Report of:	Executive Director – Economy, Environment & Culture		
Contact Officer:	Name:	Andrew Renaut	Tel: 01273- 292477
	Email:	andrew.renaut@brighton-hove.gov.uk	
Ward(s) affected:	All		

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

- 1.1 The city council receives capital funding each year for transport schemes through the government's Local Transport Plan [LTP] process. The council approved the use of capital funding for approved and new Transport schemes and projects for 2018/19 on 22 February 2018 as part of the overall budget, which included £5.365m worth of known, new capital investment in Transport from Government sources.
- 1.2 The LTP is a statutory document and the council's fourth LTP [LTP4] was approved by the council in March 2015. The LTP4 consists of a long-term Strategy to 2030, and a short term 4-year Delivery Plan within which 2018/19 is the last year. Maintaining, managing and improving the city's transport and highway infrastructure, which is one of the city's largest assets with an estimated value of at least £1.4 billion, is an essential part of the council's investment which helps support and provide access to the many activities that are important to the city's residents and local communities and its wider, sub-regional economic role within the Greater Brighton City Region.
- 1.3 The amount of 2018/19 capital funding is based on Government estimates of how much investment is required in the city. The council then ensures that this capital investment is focused on ensuring the highway network is maintained and renewed to a high standard; improving safety; increasing choices for some journeys by providing for, and encouraging, the use of sustainable transport; and creating a more attractive public realm. The proposed, detailed programme allocates funding across a number of areas including capital renewal (maintenance); capital repairs (potholes); asset management; and integrated transport projects and programmes. It includes commitments to schemes that are already approved, ongoing programmes of works and new projects which will deliver long-term benefits to the city and its residents. It is based on a number of factors, which include taking account of:-

- recent or past decisions made by this or other council committees, often following public consultation, to deliver transport projects and programmes;
- the prioritisation of allocations to projects or programmes identified in investment or action plans which are required to deliver the aims and objectives of approved, council strategies or plans following public consultation;
- decisions made by committees in response to the receipt of petitions, deputations or Notices of Motion;
- requests for improvements from ward councillors or residents which are prioritised according to need or significance, based on committee-approved policies or assessment criteria, if available;
- engagement and discussion with The Connected City's Transport Partnership; and
- technical or statistical data, surveys or evidence which indicate that a significant problem exists and requires capital investment to correct it.

- 1.4 Investment in short-term, reactive repairs to the transport network in response to relatively minor problems identified by officers or residents is carried out from within existing revenue budgets, which are allocated separately within each financial year via the delegated authority assigned to the Executive Director of Economy, Environment & Culture.

2. RECOMMENDATIONS:

That the Environment, Transport & Sustainability Committee:

- 2.1 Recommends that Policy, Resources & Growth Committee agree the 2018/19 Local Transport Plan capital programme budget allocation of £5.365 million to projects and programmes and notes the additional allocations for schemes agreed at Budget Council, as set out in Appendix 2 of this report; and
- 2.2 Notes the indicative allocations of future LTP budgets to projects and programmes for 2019/20 and 2020/21 to continue funding the next Local Transport Plan Delivery Plan, as set out in paragraphs 3.25 and 7.2 of this report.

That the Policy, Resources & Growth Committee:

- 2.1 Agree the 2018/19 Local Transport Plan capital programme budget allocation of £5.365 million to projects and programmes and notes the additional allocations for schemes agreed at Budget Council, as set out in Appendix 2 of this report; and
- 2.2 Notes the indicative allocations of future LTP budgets to projects and programmes for 2019/20 and 2020/21 to continue funding the next Local Transport Plan Delivery Plan, as set out in paragraphs 3.25 and 7.2 of this report.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The capital funding secured through the LTP process and invested through its strategies and delivery plans has contributed towards enhancing local neighbourhoods and environments and strengthening the city's role as a

transport hub and centre for economic activity within the wider Greater Brighton City Region. Schemes include those within the city centre, such as Valley Gardens, and the seafront, including rebuilding and regenerating the city's historic 'arches' (which are highway structures supporting the promenade and A259). More localised investment in neighbourhoods has included bus stops, pedestrian crossings, cycle facilities and Rights of Way improvements.

- 3.2 In addition, LTP budgets have been used to help secure and deliver significant levels of capital funding from other sources for many different projects. These have included competitive, Government funding rounds, and applications to secure funding allocated to the Coast to Capital [C2C] Local Enterprise Partnership [LEP] as part of the Local Growth Fund, which is helping to fund the Valley Gardens project which will improve the movement and flow of people and vehicles across and through the city centre.
- 3.3 The overall 2018/19 capital programme is made up of two traditional LTP block allocations for Maintenance and Integrated Transport, plus two additional funding streams which are:-
- **'Incentive' Funding [IF]** – additional funding allocated to councils that demonstrate: approval of a highway infrastructure asset management strategy; input of stakeholders into the process; collaborative working with construction partners; standard specifications; joint contracts and collaboration with other local authorities.
 - **Pothole Action Fund [PAF]** – for minor road surface repairs, or to prevent potholes forming;
- 3.4 The proposed allocation of funds to schemes (set out in Appendix 2) has been based on two main factors - 1) the progress made on completing or continuing spend on 2017/18 projects and programmes; 2) the agreed contributions or commitments to begin new projects/programmes in 2018/19; and 3) success in securing, or being allocated, additional funding from external sources e.g DfT and LEP (Local Growth Fund) [LGF].
- 3.5 The content of the programme is described briefly below, and is consistent with the principles established within the LTP4 Delivery Plan – maintaining the network, managing movement, and improving streets and infrastructure. When required, all projects will be fully co-ordinated with other council schemes and works by other agencies (gas, water etc) to minimise disruption and ensure efficient use of funds.

CAPITAL RENEWAL (MAINTENANCE) FUNDING

- 3.6 The proposed programme of just over £5.4m for this area of work includes £2.5m worth of funding from other sources amounts in addition to LTP, IF and PAF capital allocations for 2018/19. This funding is focused on maintaining links and routes and reflects the continued and growing need to renew highway infrastructure in order to ensure that it has a longer life. This minimises the need for ongoing/short-term repairs which are funded from revenue budgets.
- 3.7 The programme includes just over £1.000m for road re-construction. Priority consideration will continue to be given to repairing damage that has occurred to

key routes to address the effects of high traffic volumes and recent and continuing extreme winter weather conditions. Sections of roads where the surface requires immediate, major repairs or renewal will be identified based on recent surveys. Priority locations will include the strategic, heavily trafficked routes into the city. A further £0.150m will help improve the condition of footways across the city, with a focus on well-used corridors. A new programme has also been developed to treat tree root areas using flexible paving to reduce highway surface water penetration and therefore reducing flood risk in some of the higher flood risk areas. £0.200m has been allocated to increase the investment in addressing significant problems associated with damaged highway drainage that causes surface water flooding on roads and pavements. Work is initially prioritised in the city's outlying areas which also benefits the central area as the land slopes towards the sea.

- 3.8 Significant works to assess and strengthen highway structures across the city will also continue (requiring almost £1.8m from the LTP allocations) to ensure they remain in a safe condition and are fit for purpose. The overall amount of investment is required in order to inspect, maintain or renew structures which are a critical, but ageing, part of the seafront's infrastructure from the Former West Street Shelter Hall to the Bandstand. This investment accords with the principles of the council's Seafront Investment Plan.
- 3.9 The programme includes a total of £3.5m towards the £19.2m strengthening of the former West Street Shelter Hall structure which supports the A259, and improvements to the junction of King's Road and West Street. Approximately half of the total cost of the scheme has been secured via a successful bid to the Government's Highways Maintenance Challenge Fund. As reported at Policy, Resources & Growth Committee on 8 February this year, the projects costs have increased from original estimates. This is because there have been:-
- a number of significant engineering and geotechnical challenges due to unstable ground conditions that has necessitated both major temporary and permanent engineering solutions to ensure the stability of the A259, as the council is effectively trying to rebuild a bridge whilst keeping it open;
 - a greater than anticipated number of historic buried structures (sea walls) and in addition the statutory undertakers have required the installation of additional utilities infrastructure;
 - significant challenges in trying to build a new structure over a strategic main sewer which runs through the site; and
 - a number of significant design changes to ensure the final building meets the council's Property & Design Estates Team's, Planning's, Conservation's and Historic England's requirements including the complete re-fabrication and re-location of the listed kiosk.
- 3.10 The opportunity has also been taken by the council to create a higher specification land mark building over two floors to maximise future income and create a centrepiece flagship venue, which will encourage and enable other planned major developments to be brought forward, such as the Waterfront Development. The former, listed kiosk was also unable to be salvaged and had to be completely rebuilt in accordance with strict historical and conservation parameters, which has incurred additional cost and delays.

- 3.11 An additional £0.5m from the council's capital receipts will be invested in maintaining Hove Station Footbridge, which will benefit local connections to the station and Central Hove.
- 3.12 £0.3m has been allocated to assist in reducing the ongoing maintenance requirements for the £10m-plus worth of street lighting in the city. Surveys and condition assessments identify areas/corridors that require street lighting column replacement. The approved 'Invest to Save' initiative will include an ongoing programme to upgrade lighting with more efficient lanterns/lamps to help accelerate reductions in electricity and maintenance costs, and achieve the city's carbon emission targets. The programme of investment in 2018/19 is currently being planned and finalised.
- 3.13 A government requirement for all Highway Authorities to identify and account for their infrastructure (often referred to as assets) by preparing a Highway Asset Management Strategy [HAMS] will be continued during 2018/19. £0.075m has been allocated to fulfil this requirement and the completed HAMS will form the basis of a comprehensive inventory. This will be used to prepare medium and long-term programmes of works to maintain the highway to required standards, based on its current condition. The council's self-assessment of its progress has been submitted to the Government and is considered to warrant a Band 2 grading which should secure additional ('incentive') funding for works of at least £0.196m.

INTEGRATED TRANSPORT FUNDING

Connecting people with destinations, activities and services

- 3.14 Ensuring that transport investment is targeted in locations that will help support the wider needs of the city is critical to helping deliver a broad range of improved service outcomes. These locations can include important local facilities and/or more significant destinations that help draw people and investment to the city from a wider area.
- 3.15 £0.120m worth of proposed investment in 2018/19 will include improving the safety and environment around, and on routes to, schools and increasing the transport options available to reach centres of economic activity and employment can assist in reducing congestion. Measures include those that will assist in encouraging sustainable, travel behaviour change, such as workplace and school travel planning, some of which are match-funded by businesses.
- 3.16 Local shopping centres are a focus for many communities/visitors and provide a variety of facilities and services that can help to reduce the need to make a number of separate journeys. Enabling these locations to be more accessible and attractive to everybody and function safely and practically e.g deliveries and servicing, provides the opportunity for them to thrive as part of the local economy. Following its prioritisation within the LTP Delivery Plan by this committee in November 2015, it is proposed that work will begin to explore and develop preliminary proposals for the Boundary Road/Station Road corridor in Portslade in 2018/19.
- 3.17 Local parks and open spaces provide excellent opportunities for people of all ages to improve their quality of life in terms of relaxation, fresh air or exercise.

Improving access to those locations will enable them to be reached safely and sustainably, or address local perceptions of danger or severance, and therefore be used more regularly. Improving Rights of Way [RoW] in line with the statutory RoW Improvement Plan (currently at consultation stage) will continue, and RoWs which provide improved links with the South Downs National Park remain a priority.

- 3.18 £0.085m worth of investment is proposed in interchange facilities, where people can transfer between different forms of transport on their journey/visit. A previously approved, but unspent allocation for cycle parking at rail stations, including Hove, Portslade, London Road and Moulsecoomb, is also planned to be spent in 2018/19 but is dependent upon more significant progress being made by the lead partner, Southern Rail. Opportunities will also be taken to invest in more secure, on-street motorcycle parking. Significant progress is expected to be made on developing proposals for the 'Gateway to the Sea' project, between Brighton Station and the Seafront, which includes the busy Clock Tower junction.

Improving neighbourhoods

- 3.19 Continued investment is required in targeted road safety engineering schemes to maximise casualty reduction, in line with the positive results achieved recently in reducing the number of people killed or seriously injured. £0.180m is proposed to be invested in locations where driver speeds still exceed speed limits in 20 mph areas, and the Portland Road/Rutland Gardens 'high risk' site.
- 3.20 Tackling pollution levels in the city's Air Quality Management Areas remains a high priority. A previously approved allocation of funding will enable a minor traffic management scheme in Rottingdean Village to be delivered to help reduce harmful emissions in the High Street. Walking and cycling are the best forms of 'low carbon' transport and the activity involved also provides additional personal health benefits for individuals and can help reduce pollution if they replace some car journeys. Increasing the mobility of local residents with 'dropped' kerbs and level surfaces, alongside clear wayfinding signing for visitors, are important ways to increase the attractiveness and convenience of these types of journeys in the city, especially over short distances. A total of nearly £0.245m is planned to be spent specifically in these areas in 2018/19. Other named projects within the overall programme will also include measures to enable and increase active and healthy travel.
- 3.21 The expansion of the city's electric vehicle charging point network will help respond to the growing demands for this infrastructure by widening choice and also reducing carbon emissions. A £0.055m allocation will help towards increasing provision and developing a more significant; step-change in investment will be achieved by exploring and bidding for additional funding sources which are being discussed with the Government's Office for Low Emission Vehicles [OLEV] and other partners in the city.

Managing links and improving routes

- 3.22 Ensuring the efficient movement of people and vehicles across and along key transport corridors helps to keep the city moving and enable or promote regeneration. Construction will start in mid-2018 on the agreed Valley Gardens

(Phases 1 & 2) scheme using an LTP allocation and LGF, and progress will begin on developing proposals for Phase 3 of the project between Edward Street and the A259/Palace Pier and preparing a Business Case to submit to the C2C LEP in order to secure the current, provisional £6m LGF allocation. Owing to other funding requirements within the capital programme, work to develop proposals for the Church Road corridor in Hove is now proposed to be undertaken beyond 2018/19, following its prioritisation by this committee in November 2015.

- 3.23 Continued investment in the use of technology to manage the city's transport network is planned to help modernise and optimise traffic signal-controlled junctions and pedestrian crossings and improve driver information and traffic management, including £0.100m for the approaches to, and junction of, Wilson Avenue and Roedean Road.

General allocations

- 3.24 Some minor investment is required in 2018/19 for some schemes after the main construction works have been completed in 2017/18 e.g safety audits and additional remedial works, and to allow some initial scoping and preliminary work on new schemes. An allocation of £0.050m of funding will also enable officers to undertake work on investing funding legally secured from permitted planning applications (referred to as 'Section 106 contributions') in locations across the city. This will assist in significantly reducing the £2.3m balance held by the council, as reported to the Tourism, Development & Culture Committee in November 2017, and involve investment in transport and highway measures which are primarily focused on sustainable (walking, cycling and public transport) measures. Some data collection will also be undertaken to assist in monitoring and assessing the wider effects of some schemes and projects.

Future transport capital programme investment

- 3.25 In approving its 2018/19 budget, the council has also confirmed that it expects to receive LTP capital allocations from the Government of £5.169m in both 2019/20 and 2020/21 through the LTP process. These sums will enable the ongoing development and delivery of certain schemes or initiatives as part of the council's LTP Delivery Plan, and will be dependent upon future budget decisions made by the council, and the committee is therefore recommended to note them.

OTHER SOURCES OF FUNDING

- 3.26 The LTP process is one of many funding sources that are used to deliver transport schemes. For example, in 2017 the council was successful with its £1.485m bid for the Government's Access Fund which will support sustainable and accessible travel projects to help overcome barriers to jobs and economic activity between 2017 and 2020, which will be focused on Lewes Road in 2018/19 and Whitehawk/Eastern Road in 2019/20.
- 3.27 As referred to in paragraph 3.24 above, investment in local transport is also secured through the planning process via legal agreements. For example, funds from the redevelopment of the Royal Sussex County Hospital will fund measures within 2km of the site and the Eastern Road corridor. Other sums previously

secured for making bus stops and pedestrian routes accessible and level will be used in 2018/19 to continue these important work programmes across the city near development sites.

- 3.28 The council has also successfully secured funding for major and significant transport schemes by bidding for Local Growth Fund [LGF] money, which is administered by the C2C LEP. This funding will help support the retention and delivery of jobs and housing in the city and the Greater Brighton City Region. In future years, the LTP capital programme may also need to reflect new or successful bids for funding, when these opportunities arise.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The proposed 2018/19 LTP capital programme is consistent with the Strategy and the principles of the Delivery Plan in the approved LTP4, and the proposed allocation of capital investment will help contribute to meeting local transport and wider policy objectives and outcomes. The programme includes commitments to financial contributions to projects and programmes. These will have either helped secure much larger sums of capital funding from other sources for the council or will be combined with other sums to invest in comprehensive improvements to the city's transport network. Maintaining these commitments is essential to deliver those projects and should help support the consideration of the council's case for any similar bids in the future.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The proposed, detailed 2018/19 programme was reported to, and discussed by The Connected City's Transport Partnership in February 2018. Engagement and consultation also took place in 2014/15 prior to the approval of the LTP4 document in March 2015. The ET&S Committee also considered and approved a number of new projects and priorities to be progressed as part of the LTP capital programme/Delivery Plan in November 2015.
- 5.2 As outlined in paragraph 1.3 of this report, many individual projects and programmes have been, or will be, the subject of consultation with local communities and ward councillors. Alongside the Maintenance/Renewal programme, the delivery of Integrated Transport schemes will be considered by the council's Head of Traffic Management in terms of minimising the potential effects of works on the overall operation and management of the transport network in Brighton & Hove.
- 5.3 Multi-agency working remains key to helping achieve improvements in service outcomes and overall performance across the city through scheme development and transport investment. Improving transport infrastructure and services ensures that the council and its partners can meet the varying needs of the city, especially at a time when achieving sustainable economic, environmental and social outcomes, through value for money investment, are high priorities.

6. CONCLUSION

- 6.1 The decision of the committee to approve the allocation of the 2018/19 LTP capital programme to projects and programmes will provide a clear indication of

proposed plans for capital investment in transport using the LTP budget, and other sources of funding such as the LGF. The overall budget includes all the allocations made at Budget Council in February 2018 and it will enable works to be continued or started, which will continue to support the council's, city's and wider stakeholders' objectives.

7. FINANCIAL & OTHER IMPLICATIONS:

- 7.1 In 2014 the Government announced the council's indicative funding allocations for 2018/19 to 2020/21 which are included within the council's 10-year budget planning approach for its Medium Term Financial Strategy. These sums are still to be confirmed by the Government, but are not expected to change.
- 7.2 The council's 2018/19 capital programme was approved at Budget Council in February 2018 and this report sets out the proposed use of the £5.365m worth of Government funding within the Transport capital programme. The 2018/19 LTP capital programme is primarily funded by Department for Transport grants and also includes additional funding secured or approved.

Government Funding Source	Indicative allocations £'000s		
	2018/19	2019/20	2020/21
LTP Integrated Transport Block	3,059	3,059	3,059
LTP Highway Maintenance Block	2,110	2,110	2,110
Total LTP Grant Funding	5,169	5,169	5,169
Incentive Funding	196	<i>tbc</i>	<i>tbc</i>
Pothole Action Fund	<i>tbc</i>	<i>tbc</i>	<i>tbc</i>
Transport Funding Available	5,365	5,169	5,169
Council capital receipts	1,500	0	0
Council unsupported borrowing	3,805	3,805	<i>tbc</i>
Forward funding from reserves	0	1,000	-1,000
Council direct revenue	0.145	0.145	0
Local Growth Fund [LGF]	3,573	6,540	3,000
Overall Total Funding	14,388	16,659	7,169

tbc - to be confirmed. Allocations not announced/known.

- 7.3 Future years' capital programmes will require Policy, Resources & Growth Committee approval.

Finance Officer Consulted: Rob Allen

Date: 08/03/18

Legal Implications:

- 7.4 The LTP is a statutory requirement and was adopted by Full Council in March 2015. There are no direct legal implications associated with approving the 2018/19 LTP capital programme and noting future indicative allocations, which are consistent with the Delivery Plan set out within the LTP4. A number of sums reflect contributions to existing LGF projects which are or will be subject to formal Funding Agreements with the C2C LEP. Any relevant legal implications will be considered when individual schemes are brought forward for implementation.

Lawyer Consulted: Elizabeth Culbert

Date: 27/02/18

Equalities Implications:

- 7.5 In developing specific projects and programmes within the 2018/19 LTP capital programme, the needs of those people and communities who are identified as having 'protected characteristics' (those against which discrimination is unlawful) as defined by the Equality Act 2010 will be prioritised from the outset, and wherever possible their needs will be incorporated into designs in order to overcome barriers to movement that may be experienced. In doing so, this will ensure that the transport network is made accessible to everybody, irrespective of any protected characteristic. Improvements to local areas and strategic transport routes will enhance the provision and choice for people, especially those with mobility difficulties, or other disabilities. Road safety schemes will improve conditions for vulnerable road users. This type of investment will also help support some of the recommendations of the council's Fairness Commission.

Sustainability Implications:

- 7.6 LTP capital funding enables the council to meet environmental objectives set out in the LTP4 Strategy and the council's Sustainability Action Plan, such as a shift towards greater use of sustainable transport and reducing carbon emissions.

Any Other Significant Implications:

- 7.7 The 2018/19 LTP capital programme helps deliver the objectives of the LTP as a strategic document for the city, and transport and travel have a significant role in supporting and helping achieve the city's and council's wider objectives across a number of service departments. Additional, wider implications associated with the proposed investment are therefore set out in Appendix 1 of this report.

SUPPORTING DOCUMENTATION

Appendices:

1. Other Significant Implications
2. Proposed 2018/19 and Future Years' LTP capital programme allocations

Documents in Members' Rooms

1. None

Background Documents

1. Report to Budget Council – February 2018
2. Report to Tourism, Development & Culture Committee (Section 106 Financial Report) - November 2017
3. Report to Environment, Transport & Sustainability Committee (LTP Future Priorities) – November 2015
4. Report to Full Council meeting (Approval of LTP4) – March 2015
5. Brighton & Hove City Council's Fourth Local Transport Plan [LTP4] – March 2015

Other Significant Implications

Crime & Disorder Implications:

- 1.1 There are no direct implications arising from the proposed 2018/19 LTP capital programme. However, the LTP4 has a particular focus on improving road safety and personal security and, wherever possible, its projects and programmes will seek to support the aims and priorities of the council's Community Safety and Crime Reduction Strategy 2017-20, especially in helping to deliver measures that improve the physical environment, ensure communities are stronger, and help people feel safer. This can include work to design, improve, manage and maintain public spaces and streets so that people feel safe. The positive use of spaces is encouraged to ensure that crime and anti-social behaviour are discouraged.

Risk and Opportunity Management Implications:

- 1.2 The design of most transport schemes are safety audited to ensure they comply with current design standards. Regular monitoring and reporting throughout the year of the LTP capital programme and its projects will minimise the risk of not fully spending the approved investment programme. Maintenance of the seafront as an asset to the city is identified within the council's Strategic Risk Register because it includes the transport routes and highway structures that form support it. Investment in it therefore forms part of the proposed 2018/19 capital programme. Investment in scheduled maintenance of roads, pavements and cycle routes provides safer infrastructure for all users and reduces the need for expensive reactive repairs.

Public Health Implications:

- 1.3 Transport and travel are critical to delivering the city's public health objectives as they contribute significantly to some of today's greatest challenges to public health, including road traffic injuries, physical inactivity, the adverse effect of traffic on social cohesiveness and the impact on outdoor air and noise pollution. Improving people's and communities' health and well-being is a key objective of the LTP4, and the LTP capital programme allows continued investment in transport improvements that provide for and promote active travel, such as walking and cycling. This investment also helps to improve air quality by reducing harmful emissions therefore delivering objectives and actions set out in the council's Air Quality Action Plan, such as providing for electric vehicles and enabling greater use of alternatives to the car for some journeys. Creating less dangerous and more attractive environments, such as road safety and public realm schemes, will improve individual and community health and quality of life.

Corporate / Citywide Implications:

- 1.4 The LTP includes principles and objectives that will help support the city's planned economic growth, social development and environmental enhancement. The annual capital programme plays an important role in delivering the council's Corporate Plan; the City Plan Part 1 policies (especially Policy CP9 on

Sustainable Transport) and the schemes/projects identified within its associated Infrastructure Delivery Plan. The LTP capital programme will also reflect the current and emerging priorities and policies of the council, city, and other partners and stakeholders which are set out in other strategies, policy documents or statements such as the LEP's 2014 Strategic Economic Plan; the emerging Greater Brighton City Region Inward Investment and Trade Strategy; the preliminary work that will inform The Connected City's 2030 City Vision; and the outcomes set out in the 2014-2019 South Downs National Park Partnership Management Plan. Over time, the city's role within the wider region will also be acknowledged, especially within the emerging priorities and collaboration that is being achieved within the Sub-national Transport Body known as Transport for the South East [TfSE] through its Shadow Partnership Board. The primary aim is to improve the region's economic connectivity and increase productivity through strategic investment in transport improvements.

PROPOSED 2018/19 AND FUTURE YEARS' LTP CAPITAL PROGRAMME ALLOCATIONS

Project/Scheme	Description (please see Footnotes below for explanation of symbols)	2018/19 Proposed Allocation (£'000s)	2019/20 Indicative future allocation (£'000s)	2020/21 Indicative future allocation (£'000s)
<i>CAPITAL RENEWAL/MAINTENANCE SCHEMES</i>				
<i>Maintaining links and routes to improve.....</i>				
Surfaces	Roads [#]	1005	tbc	tbc
	Pavement/Footways	150	tbc	tbc
Drainage	Replacement of failed gullies/soakaways	200	tbc	tbc
Street Lighting	Replacement of connections and columns [@]	300	300	300
Bridges & Structures	A259 King's Road Arches (Phases 4/5) – preliminary investigation	100	tbc	tbc
	Former West Street Shelter Hall (A259)*	1500	1500	0
	Marine Parade retaining wall (Duke's Mound)	100	tbc	tbc
	Other locations	15	tbc	tbc
Highway Asset Management	Surveys, update inventory and finalise strategy evidence	75	75	75
<i>CAPITAL RENEWAL/MAINTENANCE SUB-TOTAL</i>		3,445	2,110	1,110
<i>INTEGRATED TRANSPORT SCHEMES</i>				
<i>Connecting people with.....</i>				
Education, Training & Learning	Safer Routes to Schools	60	tbc	tbc
	School Travel Plan Measures***	20	20	0
<i>SUB-TOTAL</i>		80		
Workplaces & job opportunities	Business Travel Plan Measures***	20	20	0
	Personalised Travel Planning***	20	20	0
<i>SUB-TOTAL</i>		40		
Shopping areas	Boundary Road/Station Road - Portslade	20	tbc	tbc
<i>SUB-TOTAL</i>		20		
Parks, open spaces & the National Park	Rights of Way – incl. access to SDNP	25	tbc	tbc
<i>SUB-TOTAL</i>		25		
Interchanges	Cycle parking	40	0	0
	Motorcycle parking	10	10	10
	Accessible bus-stops	35	tbc	tbc
<i>SUB-TOTAL</i>		85		
<i>Improving neighbourhoods with.....</i>				
Road Safety	20mph limits – monitoring and speed reduction measures	80	0	0
	High risk sites	100	tbc	tbc
<i>SUB-TOTAL</i>		180		
Air Quality	Electric vehicle charging points	55	55	55
<i>SUB-TOTAL</i>		55		
Active travel measures	Pedestrian crossings – freestanding sites	100	tbc	tbc
	Walking network – incl. dropped kerbs and handrails	50	tbc	tbc
	Cycle network***	40	40	tbc
<i>SUB-TOTAL</i>		190		
<i>continued...../</i>				

Project/Scheme	Description (please see Footnotes below for explanation of symbols)	2018/19 Proposed Allocation (£'000s)	2019/20 Indicative future allocation (£'000s)	2020/21 Indicative future allocation (£'000s)
Managing links and routes with.....				
Technology & Travel Information	Intelligent Transport Systems [ITS] package - Phase 2 (Wilson Avenue/Roedean Road)~	100	tbc	tbc
	SUB-TOTAL	100		
Strategic/corridor improvements	A270 Elm Grove traffic signals	15	0	0
	Valley Gardens:Phases 1 & 2**	892	57	0
	Valley Gardens:Phase 3 – engagement and preliminary design****	200	600	400
	Church Road, Hove	0	tbc	tbc
	Bus Network Review*	30	tbc	tbc
	SUB-TOTAL	1037		
Connecting people and neighbourhoods with, and improving the				
City Centre & Seafront	'Gateway to the Sea' – engagement and preliminary design	150	tbc	tbc
	SUB-TOTAL	150		
General allocations				
'Section 106' works	Various agreed local measures ⁺	50	50	50
Minor works	Scheme completion & scoping/Monitoring	20	tbc	tbc
	SUB-TOTAL	70		
	INTEGRATED TRANSPORT SUB-TOTAL	2,032	3,059	3,059
TOTAL LTP ALLOCATIONS		5,477	5,169	5,169
Funded From				
LTP Integrated Transport Block Grant Allocation		3,059	3,059	3,059
LTP Maintenance Block Grant Allocation		2,110	2,110	2,110
Highway Maintenance Incentive Fund		196	tbc	tbc
Pothole Action Fund		tbc	tbc	tbc
Additional Funding Sources				
Capital Receipts – Shelter Hall and Hove Station Footbridge		1,500	0	0
Unsupported Borrowing – Shelter Hall and street lighting		3,805	3,805	0
Funding from/(to) Reserves – Shelter Hall		0	1,000	-1,000
Council Direct Revenue – street lighting		145	145	0
Local Growth Fund [LGF] – Valley Gardens Phases 1&2 and 3		3,573	6,540	3,000
GRAND TOTALS		14,388	16,659	7,169

Footnotes

- includes Incentive Funding indicative allocation (£196,000) and Pothole Action Fund allocation (to be confirmed)

@ - committed contribution to 'Invest to Save' project (PR&G Committee – 8/2/16).

* - supplemented with additional funding from various council sources (Council-22/2/18)

** - local contribution, committed to approved C2C LEP Local Growth Fund [LGF] scheme.

*** - committed contribution to successful bid to the DfT-funded 'Unlocking Growth with Active Travel' Access Fund project.

**** - local contribution, committed subject to acceptance of Business Case by C2C LEP to secure Local Growth Fund [LGF] allocation.

~- supplemented with additional funding from other sources.

+ - to enable design and delivery of agreed works associated with approved development.

tbc - project/programme will require/receive continued funding to deliver existing/ongoing commitments (sums to be confirmed, or unknown).

NOTES –

- In many cases, costs indicated above are preliminary estimates.
- Expenditure on schemes may need to be increased, reduced or deferred during a financial year as information becomes available, such as survey results, tender returns or unforeseen engineering difficulties.
- Some works are also subject to network co-ordination with other projects, developers and utility companies, contractor availability and weather conditions.

Subject:	Air Quality Programme Update		
Date of Meeting:	20th March 2018		
Report of:	Executive Director of Economy, Environment & Culture		
Contact Officer:	Name:	Mark Prior	Tel: 01273 292095
	Email:	Mark.prior@brighton-hove.gcsx.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 advise members on the work of the Council's Air Quality Programme Board.
- 1.2 The Air Quality Board was formed in response to rapidly developing Air Quality policies, reports and specific programmes from Central Government including the Department for Environment, Food & Rural Affairs (DEFRA), Department for Transport (DfT) as well as The National Institution for Health & Clinical Excellence (NICE) Guidelines on improving air quality and the Council's own air quality evidence reported in the Annual Status Report on Air Quality.
- 1.3 Air quality is a cross-government responsibility. Local authorities have an important role to play in improving air quality, enabled by duties and powers under the Environment Act 1995, the Clean Air Act 1993, The Environmental Protection Act 1990 and the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. The work of the Air Quality Programme Board will support the alignment of the work of several City Council departments, including but not limited to; Transport, Planning and Public Health; in the delivery of improvements to air quality.

2. RECOMMENDATIONS:

- 2.1 That the Committee note the work of the Air Quality Programme Board in aligning internal projects and programmes that are directing the Council's response to improving air quality across the City.
- 2.2 That the Committee agree to receive regular Air Quality policy and programme reports including an update on the Low Emission Zone at the June 2018 ETS Committee.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The policy debate on air quality – internationally, nationally and locally – is greater than ever. It has a significant cross-cutting impact across a number of council services including public health, transport and planning. In addition, there is a significant degree of policy development activity underway including The Economic Strategy, the 2030 Strategic Framework for Transport, an Energy and Water Infrastructure and Resilience Strategy and City Plan Part 2 that have implications for air quality.
- 3.2 Air pollution is now recognised to be the largest environmental risk to public health in the UK. Poor air quality contributes to cardiovascular disease, lung growth issues in children, lung cancer and respiratory diseases as well as increasing the chances of hospital admissions, visits to A&E and respiratory and cardiovascular symptoms which interfere with everyday life, especially for vulnerable people. Brighton & Hove City Council, therefore, has a leadership role to play in adopting a single, joined up approach to improving air quality for the City.
- 3.3 The Air Quality Board has been established with a remit (Appendix 2) to provide a coherent approach and coordinated leadership on air quality across Brighton & Hove, overseeing the delivery of key projects and programmes that could influence positive air quality outcomes. At present these include::

NICE Guidelines Gap Analysis (Appendix 1)

A mapping exercise, utilising NICE Guideline NG70: Outdoor Air Quality and Health, has been undertaken to establish a baseline of current Council workstreams.

The mapping exercise has found that, encouragingly, the Council is already delivering much of what is recommended:

- Brighton & Hove City Council's various planning documents, including City Plan Part 1 (including the Sustainable Transport Policy – CP9) and the Local Transport Plan (LTP4), address the majority of the planning issues related to air quality, and provide a strategic and policy framework within which the design and siting of new developments and support for sustainable transport are addressed. The planning authority's development management systems in Brighton & Hove closely reflect the NICE recommendations; with CP9 ensuring that Transport Assessment and Travel Plans are submitted with all new development applications; Local Parking Plans outline Electric Vehicle (EV) parking space requirements for new developments; and the proposed introduction of the Community Infrastructure Levy (CIL) will encourage renewable and low carbon reduction and air quality management measures.
- Zero and low emission travel is encouraged through a variety of mechanisms including City Plan Part I and will be further addressed through active travel measures in the Local Cycling and Walking Infrastructure Plan (LCWIP) which will be developed in 2018-19. Proposals to develop a business case and seek funding to expand EV charging infrastructure is underway, with 40 public charge points already in place; and additional successes include Brighton's Bike Share scheme and City Car Club.

Although Brighton & Hove does not have a Clean Air Zone, a bus-based Low Emission Zone was introduced, in January 2015, which covers 98% of bus movements in the city. With the exception of a small number of low frequency routes, all buses entering the Low Emission Zone must be compliant with Euro-V standards by 2020. A report on current progress in meeting this target will be presented to ETS Committee in June in 2018

Steps have been taken to address emissions from council fleet vehicles, including the introduction of a fleet tracking system and low-emission procurement criteria. Smooth driving is encouraged through the 20mph speed limit in place across much of Brighton and Hove, and the Integrated Transport System for highways includes MOVA junction upgrades to reduce delays.

Active travel is specifically encouraged in City Plan Part I and II and the LCWIP will drive delivery of the infrastructure required to enable active travel; the services funded by the successful bid to the Access Fund for Sustainable Travel provide support to individuals seeking work, schools and businesses to promote and enable active travel.

Some areas for further work have been identified:

- Consideration of ways to further develop cross-sector, city-wide, approaches to encouraging walking and cycling, addressing the provision of infrastructure, information, and attitude/behaviour change enablers. For example, through an enhanced active travel focus within the next Local Transport Plan (LTP5 to be developed in 2019) supported by the delivery of the LCWIP.
- Explore the most effective communication strategy to inform at risk / vulnerable groups about the impact of air quality and provide recommendations for action
- Address gaps relating to fleet / freight, for example, by developing a freight and fleet strategy (as part of LTP5) to address cleaner last-mile deliveries, reduce emissions from delivery vehicles, encourage more departments to introduce fleet tracking and fuel efficiency analysis systems, and conduct driver training on fuel-efficiency.
- Consideration of updated Parking Standards to include a strengthened requirement for EV-ready infrastructure.

Electric Vehicle Charging Points

The Council is exploring the potential for trialling a city-wide rollout of Electric Vehicle Charging Points that would seek to encourage wider take-up of electric vehicles and therefore reduce air pollution associated with oxide of nitrogen tailpipe emissions. The Board is overseeing the securing of external funding through discussions with the Office for Ultra Low Emission Vehicles (OLEV) and engagement with potential external partners including The Better Brighton Think Tank. The Think Tank has commissioned Ricardo to develop a detailed business case for the development of on street, car park and rapid charging points. Meetings have taken place with OLEV and officers are preparing a funding bid

for the expansion of the on street residential charging point network. Discussions are proceeding positively and will enable a further update report to be presented to a future ETS Committee on progress and next steps.

Local Cycling and Walking Infrastructure Plan (LCWIP)

At Full Council in December 2017 it was agreed that work should progress to develop further policy work on walking and cycling, the most effective way to deliver this is via a Local Cycling and Walking Infrastructure Plan (LCWIP), based on the national Cycling and Walking Investment Strategy (CWIS). This will be developed by City Transport officers during 2018-19. Delivery of a LCWIP will also assist in the delivery of key workstreams, identified within the NICE recommendations, in relation to the development of the cycle network and interchange.

Low Emission Zone

Since the successful implementation of the City's first Low Emission Zone in January 2015, the Government has outlined other measures available to local authorities to address air quality issues, and specifically for those cities mandated to improve air quality, including the use of Clean Air Zones. A report will be presented to ETS Committee, in June 2018, outlining the progress of the Low Emission Zone in meeting its objectives. The report will consider options for increasing standards, and other specific policies to further improve air quality.

Bike Share

The Local Growth Fund (C2C LEP) funded Brighton Bike Share Scheme was launched in September 2017 and has so far been a great success and is expected to encourage more active lifestyles. As at January 2018 the scheme had:

- 19,981 regular subscribers
- 103,241 rentals
- 193,793 miles cycled (more than six times around the circumference of the earth)

The Air Quality Board will be reviewing the public health benefits over the first year of the scheme operation.

Next Steps

The Air Quality Programme Board will continue to monitor and direct the air quality issues for the above projects and policies as well as advising the ETS Committee, Corporate Management Delivery Board and Transport Partnership on progress and recommended actions.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The Air Quality Programme Board facilitates the alignment of a number of related air quality projects being delivered by individual Council Directorates that would otherwise miss the opportunity of additional corporate support and scrutiny.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Community Engagement and Consultation will be undertaken in relation to any specific project, policy or programme that emerges from the work or oversight of

the Air Quality Programme Board, including the LCWIP and LEZ. If an Air Quality Management Area is declared, or amended, a new Air Quality Action Plan is required within twelve months requiring Committee agreement and further consultation.

6. CONCLUSION

- 6.1 The Air Quality Board has made good progress in establishing the Council's baseline position with regards to cross service working on projects and programmes that can or could see improvements in air quality.
- 6.2 During 2018-19 the Board will develop an action plan to fill the gaps identified in the baseline of current activity and to matrix manage progress against delivery of the related projects and programmes.
- 6.3 Advising and updating Members of the work of the Air Quality Programme Board will ensure there is a degree of oversight for the various air quality related work streams being undertaken across the City Council.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no direct financial implications associated with the report recommendations. Any financial implications of bids will be included in future ETS Committee reports when known.

Finance Officer Consulted: Gemma Jackson

Date: 26/02/18

Legal Implications:

- 7.2 There work outlined in the report will assist the Council in meeting its statutory duties which are set out in Section 1.2 of the report.

Lawyer Consulted: Elizabeth Culbert

Date: 28th February 2018

Equalities Implications:

- 7.3 None specific to this report

Sustainability Implications:

- 7.4 None specific to this report

SUPPORTING DOCUMENTATION

Appendices:

1. NICE Guidance Gap Analysis Report (Improving Air Quality in Brighton and Hove Mapping current policies and actions against NICE Air Pollution Guidance)
2. Air Quality Programme Board Terms of Reference

Documents in Members' Rooms

1. None

Background Documents

1. NICE Guidance (NG70) Air Pollution: outdoor air quality and health at www.nice.org.uk/guidance/ng70

Improving Air Quality in Brighton and Hove

Mapping current policies and actions against NICE Air Pollution Guidance

DRAFT

1. Purpose of document

This document summarises the findings of a mapping exercise conducted on behalf of the Brighton and Hove City Council Air Quality Programme Board, in order to identify policies and actions conducted or supported by the council which impact on air quality, and map them against the NICE (National Institute for Health and Care Excellence) Guidelines on Air pollution: Outdoor Air Quality and Health (NG70)¹. The mapping exercise is being used as a live tool by the Air Quality Programme Board as a way of assessing progress in a comprehensive way against an agreed set of guidelines.

2. Introduction

NICE is a national body that provides guidance and advice to improve health and social care. They use the best available evidence to develop recommendations that guide decisions in health, public health and social care. NG70 was published in June 2017 and covers road-traffic-related air pollution and its links to ill health; it aims to improve air quality and so prevent a range of health conditions and deaths.

This review was conducted by a Public Health Registrar, working to the Air Quality Programme Board. They consulted with Planning, Environment, Transport and Traffic system departments, to get information about current activities and relevant policies and documents. Gaps in policies and actions have been identified and highlighted, and were presented and discussed at the Air Quality Programme Board in January 2018.

The review reflects the scope of the NICE Guidelines, and thus does not include the full scope of work conducted or supported by Brighton and Hove City Council (BHCC) or partners to improve air quality. Additionally, although the NICE guidelines are aimed at an audience wider than local authority², this paper focuses on activities conducted by, or related to, the local authority.

¹ <https://www.nice.org.uk/guidance/ng70>

² The NICE guidelines are written for use by: Local authority staff working in: planning, local air quality management and public health, including environmental health; Staff working in transport and highways authorities; Local government elected members; Employers; Healthcare professionals, people working in the voluntary sector, non-governmental organisations and education; Members of the public.

The sections in this document reflect, but do not directly match, those in the NICE Guidelines; this change was made to increase clarity, to remove duplicated recommendations, or more clearly address key themes such as zero and low emission travel. The sections outlined below are as follows:

- Air pollution and plan making
- Development management and air quality
- Support zero and low emission travel (not a section in NG70, but created here to increase clarity)
- Clean Air Zones and Low Emission Zones
- Smooth driving and speed reduction
- Reduce emissions from public sector transport services and vehicle fleets
- Active travel (walking and cycling)
- Awareness raising

Please note that the scope and impact of each NICE recommendation are not equal; some address large overarching themes whereas others are more detailed, and the extent to which they have been met and the stage of implementation varies with each recommendation.

3. Achievements to date

BHCC is delivering action against most of the recommendations. City Plan Part 1 (including the Sustainable Transport Policy: CP9) and the Local Transport Plan (LTP4) address the majority of the planning issues related to air quality, and provide a strategic policy framework within which the design and siting of new developments and support for sustainable transport are addressed. The planning authority's development management service in Brighton & Hove also closely reflects the NICE recommendations: CP9 ensures that Transport Assessment and Travel plans are submitted with new development applications; Local Parking Plans outline Electric Vehicle (EV) parking space requirements for new developments; and the proposed introduction of the Community Infrastructure Levy (CIL) will further support renewable and low carbon reduction, air quality management and active travel measures.

Zero and low emission travel is encouraged through a variety of mechanisms including City Plan Part 1 (also to be addressed in Part 2) and through the active travel measures in the Local Cycling and Walking Infrastructure Plan (LCWIP) which will be developed in 2018-19. Proposals to develop a business case and seek funding to expand EV charging infrastructure are underway, with 40 public charge points already in place. Additional successes include Brighton and Hove's Bike Share scheme (BTN Bike share) and City Car Club.

Although Brighton & Hove does not have a Clean Air Zone, a bus-based Low Emission Zone was introduced in January 2015, which covers 98% of bus movements in the city. With the exception of a small number of low frequency routes, all buses entering the Low Emission Zone must be compliant with Euro-V standards by 2020. A report on current progress towards meeting this target will be presented to ETS Committee in June in 2018.

Steps have also been taken to address emissions from council fleet vehicles, including the introduction of a fleet tracking system and low-emission procurement criteria. Smooth driving is encouraged through the 20pmh speed limit in place across much of Brighton and Hove, and the Integrated Transport System for highways includes junction upgrades with a traffic control system to increase efficiency and reduces delays.

Active travel is specifically encouraged in City Plan Part 1 (and will be further addressed in Part 2) and the planned LCWIP will identify infrastructure needs to facilitate active travel; in addition, the projects funded by the Access Fund provide support to individuals seeking work, schools and businesses to promote and support active travel.

4. Summary of gaps in action against NICE guidelines

The following gaps were identified during the mapping process:

- There is no cross-sector, city-wide programme to promote walking and cycling, although an LCWIP is being developed which will assess the provision of cycling and walking infrastructure, including an integrated cycle network. Although there is work delivered to encourage active travel under the Access Fund, this is implemented on a rotating basis in the parts of the city identified to have greater need, and thus is not city wide.
- There is no comprehensive approach to awareness-raising around air quality. For example, there is no coordination with health professionals to ensure that they provide information or warnings on air quality to vulnerable groups or individuals; there are no public awareness initiatives planned to raise awareness or inform about air pollution; and although there is a website which provides information on air quality (Air Alert) uptake is relatively low (160 subscribers in Brighton & Hove) with limited information about whether subscribers are from vulnerable or at risk groups.
- The Freight Strategy referred to in City Plan (CP9) is not yet in place, although Local Transport Plan 4 (LTP4) which runs to 2018/19 outlines an aim to work with companies to 'develop a routing, delivery and servicing strategy for goods and freight vehicles', including encouraging cleaner last-mile deliveries.
- Although use of a fleet tracking system (CMS Supatrack) has been agreed for all new Council vehicles, some departments have yet to start using it. Fuel efficiency of individual fleet drivers is not analysed, and drivers are not provided with specific training on fuel efficiency.

- Parking Standards in Local Parking Plans - Parking Standards (SPD14³) don't include a requirement for 100% EV-ready infrastructure.
- There are currently no anti-idling zones within the AQMA (Air Quality Management Area), although schools have no-stop zones indicated by yellow lines; and around 100 anti-idling / engine cutting signs have been put up, including at junction approaches where there is high frequency and duration of queuing traffic; these could also be considered within the AQMA loading bays. Other anti-idling initiatives could also be considered.
- An Active Travel and Health Partnership, supported by Access Fund, works with local businesses to create active travel plans for staff; however there is no support for businesses to advise on how to reduce road-traffic related air pollution and improve fuel efficiency.
- The following NICE recommendations are considered challenging to implement in full due to practical / physical constraints (such as the lack of available sites in the city): the siting of buildings for vulnerable groups (schools, nursing homes, hospitals) away from polluted areas or roadsides; and the consideration of the impact of building configurations and vegetation on air quality (positive and negative).

5. Recommendations

The following recommendations highlight areas where a more comprehensive approach could be considered. Prioritisation should take into account where action would have greatest impact:

- Consider ways to develop a cross-sector city-wide approach to encourage walking and cycling, to address the provision of infrastructure, information, and attitude / behaviour change enablers. For example through an active travel strategy delivered alongside or as part of the LCWIP.
- Explore the most effective communication strategy to inform at risk / vulnerable groups about the impact of air quality and provide recommendations for action.
- Address gaps around fleet and freight, for example, by developing a freight and fleet strategy to address cleaner last-mile deliveries, reduce emissions from delivery vehicles, encourage more departments to introduce fleet tracking and fuel efficiency analysis systems, and conduct driver training on fuel-efficiency. This could be considered as part of Local Transport Plan 5 (LTP5) development.
- Consider an update to Parking Standards to include a requirement for 100% EV-ready infrastructure.

³ Local Parking Plans: Parking Standards – Supplementary Planning Document 14

6. Summary of policies & actions mapped against NICE recommendations

4.1 Air pollution and planning

Include air pollution in plan making; relevant plans and policies include zero/low-emission travel

City Plan Part 1 was adopted in 2016 to provide the overall strategic spatial vision and planning policy framework for future development in Brighton & Hove through to 2030. The following strategic objectives relate to air quality:

- SO11: Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion, reduce noise and promote active travel
- SO22: Ensure pollution is minimised and actively seek improvements in water, land and air quality and reduce noise pollution

City Plan Part 2, which will contain the remaining development sites and detailed planning policies, and address related air quality issues, is being prepared with intended adoption in 2020.

Local Transport Plan (LTP4) was approved in 2015 and runs to 2018/19. It includes strategic goals and transport-focused objectives including Carbon Reduction and commits to reducing transport emissions that affect climate change and the local environment. The following objectives relate to air quality:

- Reduce the need to travel for some journeys and activities
- Provide information and choices for people to enable them to travel more sustainably
- Promote and enable greater use of zero- and low-emission forms of transport
- Use new technology to maximise reduction of carbon emissions

The LTP capital programme is approved annually, and is the primary source of funding for the LTP's 4-year Delivery Plan (Part B); it includes EV charge points and measures/infrastructure to encourage and enable more walking, cycling and public transport use.

City Policy on Sustainable Transport (CP9) within City Plan Part 1: provides the policy basis for integrated, safe, and efficient movement around the city through land use planning, to reduce emissions and improve air quality. It outlines the following plans for action, to be delivered through the **Local Transport Plan (LTP)**:

- **Buses:** introduce bus lanes on key routes; ensure infrastructure allows for future bus routes.
- **Cars:** improve traffic flow using traffic management measures including Intelligent Transport Systems, support car clubs; introduce 20mph zones in residential areas; promote use of alternative fuels and electric vehicles (e.g. through charge points).
- **Freight:** Prepare and implement a Freight Strategy for the city that will create an efficient system and network for delivery vehicles.

- **Walking and Cycling:** Implement an integrated cycle network by 2030; Promote cycling and walking as 'active travel' by providing advice to residents, workers and visitors to the city
- **Travel plans:** encourage more journeys by sustainable transport by supporting development of school, workplace and personalised travel plans
- **Parking:** Do not increase car park capacity in central areas; new developments to minimise off-street parking and provide cycle parking; encourage car-free housing and incorporate new technologies such as EV charging points; promote and facilitate better use of existing large car parks on the city periphery city and transfer journeys onto existing bus and rail services.

Further updates on the Intelligent Transport System, the Freight Strategy and the Integrated Cycle Network are outlined in the document below.

City Policy 18 (Healthy City) within City Plan Part 1 states that development proposals are expected to protect and improve local air quality and should be appropriately designed to mitigate negative impacts on air quality.

CP18 also states that Health Impact Assessments (HIAs) must be carried out (or incorporated into a sustainability appraisal) on all planning policy documents and HIAs are required for all strategic developments in the city. HIAs require that applicants for new developments demonstrate that they have made provision to minimise impact of air quality on residents, including at risk groups, and minimise the contribution of the development to air pollution. This mechanism encourages developers to consider how they will respond to the recommendations in the Development Management section.

The Health and Wellbeing Strategy reflects this and makes a commitment to ensure new developments are inclusive, adaptable and accessible and to improve the public realm to encourage walking and cycling. Brighton and Hove City Council was one of the first local authorities to include an air quality chapter in their Joint Strategic Needs Assessment (JSNA)⁴, which outlines air quality issues in Brighton and Hove and their connection to health outcomes.

When plan making, consider:

Siting and designing new developments to reduce the need for motorised travel

City Plan policy on Sustainable Transport (CP9) and the **Development and Special Area policies in City Plan Part 1** commit to directing significant developments to accessible locations / places with good sustainable transport links or locations that can be made more sustainable through investment in walking, cycling and public transport improvement.

⁴ <http://www.bhconnected.org.uk/sites/bhconnected/files/6.4.9%20Air%20Quality%20JSNA%202016.pdf>

Siting buildings such as schools, nurseries and care homes away from polluted areas; siting living accommodation away from roadsides

Policy SU9 (Noise, pollution and nuisance) of the Brighton and Hove Local Plan (2005) addresses the need to site permanent accommodation away from polluted areas; it states that planning permission will only be granted for development on a site adjacent to an existing pollution / nuisance generating use and / or within an air quality 'hotspot' or potential 'hot spot' if the effect on the proposed development, its occupiers and users will not be detrimental, and effects can be mitigated.

There is no provision which specifically restricts developments for vulnerable groups away from roads, but this is considered as part of the development management process. However, the limited number of sites available for development means that it is not always possible to site new developments away from areas with poor air quality.

Avoiding creation of street and building configurations that encourage pollution build-up

This is considered during the design stages of the development management process, and can be addressed during a Health Impact Assessment.

Including trees and vegetation in open spaces or as green walls or roofs

QD16 - Trees and Hedgerows of the Brighton and Hove Local Plan (2005) requires that new developments must seek to retain existing trees and hedgerows, and wherever feasible include new tree and hedge planting in the proposals. **City Plan Part 2** will take forward a similar policy.

4.2 Development management

Incorporate air quality into travel plans

City Plan Policy on Sustainable Transport (CP9) commits to: Ensuring all new, major development schemes submit a **Transport Assessment** to identify effects of the demand for travel they create, and include measures to mitigate impacts by reducing car use, implementing agreed **Travel Plans** (which outline sustainable travel plans for new developments), and making appropriate contributions towards sustainable transport.

Atmospheric Dispersion Models are used by developers, to predict the impact of changes in traffic emissions caused by new developments, the results of which are reviewed when applications are submitted.

Environmental impact Assessments are conducted where appropriate.

Developing local parking plans

Local Parking Plans: Parking Standards (SPD⁵ 14) outline the maximum number of parking spaces in new developments, and the minimum number / proportion of EV parking places for new developments. An update of SPD14 would be required in order to encourage 100% EV-ready infrastructure.

CPZ parking areas can be used to discourage driving to work / car-use and use permit pricing to encourage the purchase of vehicles with better emissions: New CPZs (controlled parking zones) have been developed and delivered, and existing TROs (traffic regulation orders) and CPZs have been amended.

Include air quality monitoring and measures to reduce road-traffic emissions in the Regulation 123 List of funding options for the CIL⁶

The Community Infrastructure Levy (CIL) will allow funds to be raised from new developments for strategic infrastructure which supports growth, with details outlined in the **Infrastructure Development Plan Update** (2017). The type of infrastructure projects that may be funded through CIL is set out in the **Regulation 123 List** and could include renewable and low carbon decentralised energy systems schemes and installations, carbon reduction and energy efficiency measures; air quality management measures can also be considered. **City Plan Policy 7 (CP7):** Infrastructure and Developer Contributions identifies the relevant areas for developer contributions.

4.3 Support zero and low emission travel

Develop an integrated public transport network based on low emission vehicles

City Plan Part 1 states that development will be focused in the most accessible locations and encouraging development around transport hubs.

There is one Park and Ride facility at Withdean (90 spaces), but there is no city-scale/wide Park and Ride. The city council works with bus operators via the Quality Bus Partnership to deliver this work.

Through the LTP and the work done on walking and cycling infrastructure (the LCWIP), sustainable interchange between different transport modes is encouraged. E.g. the bike hub at Brighton Station, created in partnership with Network Rail.

⁵ Supplementary Planning Document, which provides detailed guidance on how planning policy will be implemented

⁶ Contributions from developers are currently secured through Section 106 for highways, transport improvements, community/recreation facilities, education, health and affordable housing. Some of these items will be replaced by CIL when it comes into effect (in 2020), though Section 106 will be used to address site specific impacts and areas such as affordable housing.

Provide charging infrastructure for zero and low emission vehicles:

- Provision of charging facilities is supported in City Plan Part: Sustainable Transport Policy (CP9).
- BHCC has forty public charge points, with allocated parking spaces. Charging points can be viewed on ZapMap, which shows their locations and availability.
- For new developments, SPD14 on Parking Standards (2014) sets out the minimum number / proportion of EV parking places for new developments. CP9 (Sustainable Transport) states that new developments should incorporate new technologies such as EV charging points. It is anticipated that CIL will start in 2020, and could support infrastructure for EV.
- There are plans for all council contracted car parks are to have EV charging points. Potential bids for OLEV (Office for Low Emission Vehicles) funding will increase charging point provision in areas without off-street parking (providing charging facilities for electric vehicles in workplaces, commercial developments and residential areas).
- The Better Brighton and Hove think tank is developing a business model for the establishment of public EV charging points. The areas being considered include:
 - Using streetlamps for on-street charging. Funding is available from OLEV, and work has started to identify the lampposts (location, power supply and upgrade status).
 - Installing charging points in car parks. There is no immediate funding available for this; use of the commercial market is being considered.
 - Creating rapid charging hubs for taxis. Scoping potential locations, power supply and funding for this has started.

Other strategies to encourage zero and low emission travel include:

- **City Car Clubs:** The City (Enterprise) Car Club has good use in city centre. This is supported by council which permits centralised parking bays for these cars. Council employees receive a 20% discount.
- **Bike share schemes:** A successful bike share scheme was introduced in September 2017 (BTN Bike share).
- **Sustainable travel discounts/loans for council employees:** Discounts on Brighton and Hove buses, interest free loans for bus/train tickets and bikes / cycling equipment, 'easit' card to save money on bus, train and cycling; bicycle mileage allowance (20p/mile) and discounted membership of City Car Club, are available to Brighton and Hove City Council employees.

4.4 Clean Air Zones and Low Emission Zones

Consider introducing a Clean Air Zone (CAZ) that restricts or charges certain classes of vehicle, supports zero/low emission travel and includes targets to progressively reduce pollutant levels below EU limits and meet WHO air quality guidelines

While Brighton & Hove has no Clean Air Zone in place, the following section provides an update on the Bus Low Emission Zone and AQMA (Air Quality Management Area).

Bus Low Emission Zone

A bus Low Emission Zone (LEZ) has been in place since 1 January 2015 between North Street and Western Road; it includes North Street and Western Road and covers 98% of bus movements in the city. By January 2020, buses can only enter the LEZ if they meet Euro-V standards; however they are scheduled to meet the Euro-V tailpipe emission standards by 2019. There are certain exemptions for very low frequency routes, and the LEZ includes conditions such as an engine switch off policy.

The Clean Vehicle Transport Fund (from DEFRA, Department for Environment, Food and Rural Affairs) resulted in 73 buses and 21 minibuses/taxis having exhaust retrofits for lower NO_x (NO and NO₂). Public and private funding will support the conversion of nine diesel buses to electric. Brighton & Hove Buses have also procured more than 80 buses which exceed the Euro VI emission standard. Further funding is required for all frequent buses to meet or surpass the much cleaner Euro VI emission standard.

A report is being produced on the impact of the LEZ since 2015 and will consider next steps required to address air quality; the transport team is consulting with eight bus companies regarding better options for further measures, which could include (for example) bringing forward the Euro VI zone, expanding the vehicle type, introducing Clean Air Zones and expanding existing anti-idling policies.

A report on the Low Emission Zone will be presented to the Environment Transport & Sustainability Committee and Licensing Committee (as appropriate) during 2018, which will include:

- Further consideration of taxi and minibus licencing within the AQMA and further afield.
- Consideration of a Clean Air Zone, which would extend existing restrictions already applied to buses and coaches. 21 minibuses/taxis have already been retrofitted to lower NO_x emissions.

Air Quality Management Area

BHCC has been monitoring air pollutants continuously since the mid-1990s. There are 66 active monitoring sites (100 including archived ones) representative of the air quality in the city centre, Rottingdean, Portslade, Hove and north of Preston Circus.

The city has had an Air Quality Management Area (AQMA) since 2004. The council declared an amended AQMA on 30 August 2013. The Air Quality Management Area is in place where

EU/WHO limits for nitrogen dioxide (NO₂) are at risk of not being met. Councils have statutory duties for air quality set out in Part IV of the Environment Act 1995; in areas where this is failing local authorities are obligated to deliver more stringent air quality action plans to work towards compliance as soon as possible. Actions to address poor air quality are addressed each year in the Air Quality Action Plan⁷ update within the Annual Status Report (ASR) on Local Air Quality.

The **Air Quality Action Plan (2015)** and **ASR updates** outlines actions to reduce emissions and exposure to ambient air pollution within the Air Quality Management Area; the limits and guidelines in this plan are all related to ambient air quality. **The Local Transport Plan 4** and subsequent updates will address junction improvements and traffic management in the AQMA.

Address regional air quality by preventing migration of traffic to other communities

- Environment and Public Health departments are working with adjacent and nearby local authorities through the Sussex Air Quality Partnership.
- The Air Quality Specialist carries out air quality assessments and source apportionment across BHCC, Lewes and Shoreham and there is scope to share actions and strategies for air quality improvement across these centres.
- The Transport Department are working with adjacent local authorities (e.g. Lewes District Council and East Sussex County Council) and participating in emergence of TfSE (Transport for the South East Partnership) as a Sub-National Transport Body.

Encourage low-emission transport within the clean air zone

- **Introduce no vehicle idling areas** (through bylaws); there are no anti-idling zones, but this could be considered in the AQMA loading bays and junction approaches. However, school frontages have yellow zig-zag lines (no stop zones) and around 100 anti-idling signs and signs requesting drivers to cut engines have been put up around Brighton & Hove.
- **Minimise congestion caused by delivery vehicles:** CP9 states that the council will establish a Freight Strategy that will create an efficient system and network for delivery vehicles, to support economic growth particularly local business and assist in reducing the impact of goods vehicles on the city's environment. The Freight Strategy isn't in place yet, but LTP4 (which runs to 2018/19) commits to working with companies to develop a routing, delivery and servicing strategy for goods and freight vehicles, including exploring possibilities for 'cleaner' last mile deliveries. The next version of the LTP will also include a Transport Carbon Reduction Plan which will include measures to reduce emissions from delivery vehicles.
- **Specify emission standards for private hire and other licensed vehicles:** 21 minibuses/taxis have been retrofitted to lower NO_x emissions.

⁷ Annual status reports can be seen at <http://www.brighton-hove.gov.uk/content/environment/noise-and-pollution/air-quality-management-city>

4.5 Reduce emissions from public sector transport services and vehicle fleets

Use a fleet recognition system to improve efficiency by reducing fuel consumption and emissions; e.g. that recognises which operators meet best operational standards

The use of vehicle tracking systems (and driver behaviour to reduce emissions) is promoted on all new fleet vehicles; to date just over 100 vehicles have CMS Supatrak fitted. However, there are a number of departments who have said that they do not want this on their vehicles for a variety of reasons.

Driver training (include fuel-efficient driving in any test conducted when appointing or appraising driving staff; train staff drivers to reduce vehicle emissions; introduce in-vehicle elements to provide information on current fuel efficiency, appropriate gear selection and speed, or next day information about driving style)

Currently there is no specific driver training programme, other than the Driver Certificate in Professional Competence (DCPC) which is an annual 7 hour training on aspects such as fuel efficient driving, health and Safety, defect reporting etc for drivers who operate vehicles over 3.5 tonnes Gross Vehicle Weight (GVW - the vehicles that use most fuel in the Council).

Monitor fuel efficiency of drivers within fleet, and evaluate impact of fleet fuel consumption on air pollutant emissions

This is not currently carried out.

Make low emissions (N02 and PM2.5) one of criteria for routine procurement decisions

Fleet specifications require Euro six emission standards or alternative technologies such as Electric or hybrid. In addition the scoring for tenders asks for low or lowest CO₂ emitting vehicles, the lowest getting the highest marks and a reducing proportion thereafter for the ones ranked lower.

4.6 Smooth driving and speed reduction

Consider promoting a smooth driving style by using speed limits, real-time information on optimum driving speed, 20mph limits, and signs that display a driver's current speed

As acknowledged in the **City Plan (Policy CP9)**, the council has introduced 20 mph speed limits across the majority of local/residential communities in Brighton & Hove. The 20mph-limit area was implemented without vertical deflection (humps and bumps), to discourage unnecessary decelerations and accelerations (which can increase emissions).

CP9 (Sustainable transport) states that the council will continue to develop and implement **Intelligent Transport Systems** which will improve the way the **highway network** is managed in real time to reduce congestion (by enhancing the current network of traffic signals, expansion of CCTV, Automatic Number Plate Recognition (ANPR) cameras and updating and extending the city's existing Urban Traffic Management and Control System (UTMC)). The

investment has taken place with a number of junctions being upgraded to MOVA (Microprocessor Optimised Vehicle Activation – a traffic control system designed to maximise junction/crossing efficiency), enabling optimisation of the timings to reduce delays. Journey time monitoring devices and CCTV installations have been installed to provide the control room with the tools to improve the way incidents are managed to reduce delays in the city.

To date, there are no real time second countdowns for traffic lights turning green (these encourage motorists to turn off whilst waiting).

4.7 Active travel (walking and cycling)

All relevant policies, strategies and plans should consider walking and cycling

City Plan Part 1 specifically encourages active travel and promoting cycling and walking and encourages new developments to promote sustainable travel. Part Two of the City Plan will also address this issue. CP9 (Sustainable Travel) refers to:

- Implementing an integrated cycle network by 2030: An integrated cycle network is not yet fully in place, however an LCWIP (Local Cycling and Walking Infrastructure Plan) is now being developed. This will be based on the national Cycling and Walking Infrastructure Strategy and will identify potential infrastructure improvements, including consideration of an integrated cycle network.
- Promote cycling and walking as 'active travel' by providing advice to residents, workers and visitors to the city: see below for more details.
- Encouraging more journeys by sustainable transport by supporting development of school, workplace and personalised travel plans: See below for more details.

Address infrastructure issues that may discourage people from walking or cycling; and provide a choice of cycling routes, which avoid highly polluted roads.

For new developments, this can be addressed through the development management process outline above.

The Council's Transport Capital Programme (for implementation of the Local Transport Plan) enables and benefits walking and cycling through improved infrastructure, such as improved road surfaces to benefit cyclists, cycling parking infrastructure, cycle lanes, pedestrian crossings, way-finding signage, improved footways, and road safety schemes).

The LCWIP which will be developed will drive the development of infrastructure improvements, including consideration of an integrated cycle network.

Foster a culture that supports physically active travel for journeys to school (for staff, parents and students) and during the school day

The Access Fund (managed by the Transport Department, and running until March 2020) is designed to support Primary and Secondary schools to develop travel plans (with accreditation), as well as providing scooter, cycle and pedestrian training for school children.

For Early Years Settings (EYS) a travel plan accreditation system is in place (Modeshift STARS accreditation) to engage with parents and children from the start of their education; the SMILE (speak, move, imagine, learn, enjoy) project & booklet has also been developed for primary schools and EYS. A school active travel strategy (which is a statutory requirement) has also been published in the form of a booklet for parents. Early Movers practitioner training is also available, to help practitioners extend the physical activity opportunities available to the under-fives in their care. The Active Travel with Young Children project is designed to encourage parents to travel actively with their young children, including becoming involved in Walk to School Week, and a Meerkat walking trail has been designed and is appropriate for young children.

Support behaviour change by supporting individuals to develop travel plans, and ensure individuals who do walk are supported to do so

The Access Fund project conducts Residential Personalised Travel Planning. These are door to door visits focused on streets with greater need, to support the unemployed or those who are job hunting to travel to work or interviews. It provides information and support on looking for work, offers of wet weather gear, bus passes, cycling training and maintenance as part of a written agreement.

The Healthy lifestyles team within the Public Health Team runs the following programmes/activities:

- Health trainers: individuals can be referred or self-refer to receive up to 6 weeks of 1-2-1 support to increase their level of physical activity, including supporting active travel.
- Health Walks is an award winning scheme, which offers free walks led by trained Volunteer Walk Leaders and accessible by public transport. There are 18 regular walks across the city, with lengths ranging from under a mile up to three miles.

Promote walking and cycling in and around the workplace

- The Transport Department, under the Access Fund, delivers an Active Travel Partnership/Forum which works with local businesses to create Travel Plans for staff active travel, and to promote a healthier workforce.
- Council staff can access benefits including interest free loans for bikes/cycling equipment, 'easit' card to save money on cycling; bicycle mileage allowance (20p/mile).

4.8 Awareness raising

Take action to raise awareness of road side traffic pollution

- Air Alert is a service provided by the Sussex Air Quality Partnership (SAQP), which will send free messages to mobile or home telephones of people who register, with information about predicted poor air quality across the region.
<https://www.airalert.info/Splash.aspx>

The following are recommended but no action is currently in place:

- Ensure healthcare professionals are aware that information on air quality is available, what it means for patients and what actions are recommended (including vulnerable groups and what to do when outdoor air quality is poor).
- Provide information on air quality via local, national and social media, during for example, weather forecasts.
- Public information initiatives to raise awareness and inform on health impacts air pollution; air quality inside vehicles; how to reduce individual air pollutant emissions and exposure. E.g. Car-free days or National Clean Air Days.
- Give businesses information on how they can reduce road-traffic related air pollution and improve fuel efficiency.

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February 2018

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Name of Programme

Air Quality

Purpose

The policy debate on air quality – internationally, nationally and locally – is greater than ever. It has a significant cross-cutting impact across a number of council services including technology, economy, public health, transport and planning. In addition, there is a lot of current policy activity underway within Brighton & Hove. The Economic Strategy, the 2030 Strategic Framework for Transport, an Energy and Water Infrastructure and Resilience Strategy and City Plan Part 2 are all under development and have implications for air quality. Air pollution is now recognised to be the largest environmental risk to public health in the UK, contributing to cardiovascular disease, lung cancer and respiratory diseases as well as increasing the chances of hospital admissions, visits to A&E and respiratory and cardiovascular symptoms which interfere with everyday life, especially for vulnerable people. Therefore, BHCC needs to provide leadership for the city and have a single, joined up approach to improving air quality.

Role and Function of the Board

The function of the Board is to take responsibility for the strategic direction and management of the Air Quality Programme. The Board is responsible for approving budgets, defining and achieving benefits, and monitoring risks, quality and timeliness in relation to this.

The key roles and responsibilities are to:

- Provide coherent and coordinated leadership on air quality discussions and issues across Brighton & Hove
- Influence the city's approach to improving air quality including action to deliver health and wellbeing outcomes
- Develop and take responsibility for the Air Quality Programme Plan and achievement of outcomes
- Ensure synergy between all initiatives relating to air quality
- Provide proactive responses to government policies and stakeholder comments relating to air quality
- Reconcile differences in opinion and resolve disputes in relation to air quality initiatives

Membership

The Project Board is comprised of:

Name	Job Title
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Programme Terms of Reference

Senior Responsible Officer	
Nick Hibberd Sponsor	Executive Director for Economy, Environment & Culture
Paul Nicholls	Parking Strategy and Contracts Manager
Sam Rouse	Senior Technical Officer, Environmental Protection
Sandra Rogers	Planning Policy Manager
Simon Cooper	Fleet & Maintenance Manager
Simon Newell	Policy, Partnerships & Scrutiny Lead

A minimum of three Board members is required for the meeting to be recognised as a Board Meeting.

The Chair is responsible for convening Board meetings, although may delegate organisation to the Programme Manager or other support staff. If the usual Chair is not available, then they must nominate a temporary Chair in their absence.

Subject:	Response to Government consultation on a Major Road Network		
Date of Meeting:	20 March 2018		
Report of:	Executive Director – Economy, Environment & Culture		
Contact Officer:	Name:	Andrew Renaut	Tel: 01273 292477
	Email:	andrew.renaut@brighton-hove.gov.uk	
Ward(s) affected:	All		

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

- 1.1 In line with announcements it made last year, the Government published its proposals to develop and establish a Major Road Network [MRN] for consultation on 23 December 2017.
- 1.2 The MRN consultation includes proposals for creating a designated network of England's most important routes (A class roads) which complement motorways and strategic trunk roads (the Strategic Road Network [SRN]). It is based on the 2016, independently published, Rees Jeffreys [RJ] Road Fund Report. The DfT expects that the MRN will be of approximately the same mileage as the SRN which Highways England is responsible for, and is being described as the 'middle tier' of roads in the country, between the SRN and local roads.

2. RECOMMENDATIONS:

That the Environment, Transport & Sustainability Committee:

- 2.1 Note and endorse the officer response submitted to the Government's Department for Transport on 12 March 2018 on behalf of the council in response to the consultation on its proposals for the creation of a Major Road Network in England and Wales, as attached in Appendix 2 of this report, including the particular requests for additions and deletions set out in paragraph 3.9 of this report;
- 2.2 Note the officer response submitted to the Government's Department for Transport on 7 February 2018 on behalf of the council in response to the consultation on the Highways England report entitled 'Shaping the future of England's strategic roads', as attached in Appendix 3 of this report; and
- 2.3 Note and welcome the continued progress being made by the emerging Transport for the South East Sub-national Transport Body, as summarised in paragraphs 3.20 and 3.21 of this report.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Rees Jeffreys Road Fund [RJRF] exists to provide financial support in the form of grants and bursaries for courses, research projects and programmes or schemes to improve the highway network and the roadside environment with the aim of promoting and securing better and safer roads in terms of design, engineering and aesthetics including enhancements of the experience of road users.
- 3.2 In 2016 the RJRF published a report 'A Major Road Network for England', which made the case for more investment in the most economically important 'A' roads managed by local highway authorities. The Government accepted the case made in that report and developed plans to consult on the creation of a MRN in the Transport Investment Strategy, published in July 2017. The consultation began on 23 December 2017 and runs until 19 March 2018. A formal consultation response is scheduled to be published in summer 2018, at the same time as the finalised MRN network.
- 3.3 The creation of the MRN intends to provide more long-term certainty of funding, with a portion of the capital funding available through the National Roads Fund being dedicated to the MRN. The National Roads Fund will be funded through Vehicle Excise Duty and is due to be implemented by 2020. However, it is expected that initial funding will be dedicated to Highways England's funding requirements so it is possible that funding for the MRN may become available from around 2022.
- 3.4 The consultation does not propose any changes to current local authority responsibilities. Following the creation of the MRN the roads within it will continue to be managed by the local highway authority. The proposals set out a role for Sub-national Transport Bodies [STBs] in developing a Regional Evidence Base which would identify and prioritise potential schemes to tackle issues impacting the network. Further guidance is to be issued on the Regional Evidence Base, although the timescales for this are unclear.
- 3.5 To assist in understanding the MRN proposals and developing the council's response to the consultation, officers have been involved in the TfSE's Senior Officer Group and Transport Strategy Sub-Group and their meetings and activities. These have included participation in a workshop to identify links for potential addition or removal; benefitting from the advice of one of the co-authors of the Rees Jeffreys Road Fund Report on the creation of a MRN (who has been commissioned to advise TfSE on its response to the consultation); attendance at a further workshop with transport planning, highway management and maintenance representatives from TfSE's constituent authorities and LEPs, which reviewed the suggested changes to the MRN network in the South East and the draft response to the consultation.
- 3.6 The council's approved 2015 Local Transport Plan (March) identified the strategy and policy development work that is required to further develop and strengthen the council's overall Transport Strategy. These included a Transport Carbon Reduction Plan; a Coach Strategy; a Freight & Delivery Strategy; a Technology & Travel Information Strategy; an Interchange Strategy; and a Corridor/Route Hierarchy. The latter was considered important because there had been very

little review or change to the designation and numbering given to roads in the city for many years. It was therefore considered appropriate to consider how the city's roads are actually used and how that compares to their designated status/numbering and determine if any changes are required to better reflect their role or manage the network differently.

- 3.7 In October 2015, this committee also agreed to the development of a citywide Traffic Network Management Strategy [TNMS] and in November 2015 this committee also agreed further prioritisation of the LTP workstreams and agreed that of the above strategies and plans, those for Technology & Travel Information; Freight & Deliveries; and the Corridor/Route Hierarchy should be considered as part of the development of the Citywide 'Traffic' Network Management Strategy. In particular this would enable a strategic approach to be taken to a number of other issues that have been identified as priorities. The work on a national MRN therefore also provides further impetus to the need to develop a TNMS and consider and address the city's Corridor/Route Hierarchy.
- 3.8 In November 2017, this committee also agreed to request that officers have regard to the role and future of the A259 when responding to the forthcoming Government consultation on proposals for a Major Road Network.
- 3.9 In creating the MRN, the Government has five central policy objectives. These are:-
 - **Reduce congestion** – alleviating local and regional congestion, reducing traffic jams and bottlenecks.
 - **Support economic growth and rebalancing** – supporting the delivery of the Industrial Strategy, contributing to a positive economic impact that is felt across the regions.
 - **Support housing delivery** – unlocking land for new housing developments.
 - **Support all road users** – recognising the needs of all users, including cyclists, pedestrians and disabled people.
 - **Support the Strategic Road Network [SRN]** – complementing and supporting the existing SRN by creating a more resilient road network in England.
- 3.10 The MRN consultation was structured around 16 key questions focused on:-
 - **Core principles** – increased certainty of funding; a consistent network; a co-ordinated investment programme; clear local, national and regional roles; a focus on enhancements and renewals; and strengthening links with the SRN.
 - **Defining the MRN** – based on traffic flows, economic centres, transport hubs, SRN resilience and relief.
 - **Investment Planning** – requiring the preparation of Regional Evidence Bases that will include an assessment of the network and identification of priority corridors to inform the development of the MRN Investment Programme, which will be updated every two years.
 - **Eligibility and Investment Assessment** - MRN schemes will only be considered if they seek funding in excess of £20 million, up to a maximum ceiling of £100 million, and are supported by a local contribution and will be assessed based on the DfT's five central policy objectives.
- 3.11 The types of schemes that will be eligible for funding will be bypasses, missing links between the MRN or SRN, widening of MRN roads, major structural

renewals, major junction improvements, variable message signs, traffic management, and the use of smart technology and data, and packages of improvements.

Response to MRN consultation

- 3.12 The DfT's MRN proposals include an indicative network based on its defining criteria. In Brighton & Hove, the DfT only included the A23 between the A27 and Valley Gardens; the A270 (Lewes Road) between the A27 and Valley Gardens; and the A270 (Upper Lewes Road). At present, the primary recommendations by officers for additional sections (or deletions) of MRN road lengths in Brighton & Hove based on the proposals published by the DfT are summarised below and illustrated in Appendix 1.
- Include the A259 from ESCC boundary to WSCC boundary
 - Include the A23 – southern section (from London Road/A270 to A259)
 - Include the A293 (between the A27 (Hangleton) and A259 (Portslade))
 - Delete the A270 (Upper Lewes Road).
- 3.13 Appendix 2 of this report includes the officer response that has been prepared and submitted to the DfT on behalf of the council, in order to meet the consultation deadline of 19 March 2018. A copy of the response submitted on behalf of the Transport for the South East Sub-national Transport Body in response to the MRN consultation has also been placed in the Members' Rooms, for reference.
- 3.14 The next steps are expected to be a formal consultation response will be published during summer 2018. The DfT will continue to engage with both local and regional bodies to support the finalisation of an MRN Programme to be launched in summer 2018, and it expects to review and refresh the MRN every 5 years.

Highways England Report on the Strategic Road Network [SRN] Consultation

- 3.15 In December 2017, the Government also published 'Shaping the future of England's strategic roads: consultation on Highways England's Initial Report'. The deadline for comments to be submitted was 7 February 2018.
- 3.16 The report covers Highways England's [HE's] approach to its Roads Investment Strategies [RISs] (RIS1 = 2015-2020 and RIS2 = 2021-2025), which address:-
- „ Operations, maintenance and renewals
 - „ The smart motorway spine
 - „ Expressways
 - „ Transformational investments
 - „ Delivering a balanced programme
 - „ Renewed focus on small schemes
 - „ Refined designated funds
 - „ The future.
- 3.17 To inform its response to the HE's initial report, the DfT has itself sought views on the proposals made by HE; the DfT's analytical approach for developing RIS2 and whether it is sufficiently robust; and whether the DfT has heard the full range

of views that should be incorporated into the RIS2 programme, including about the shape/extent of the SRN. Appendix 3 of this report includes the officer response that was submitted to the DfT on behalf of the council, in order to meet the SRN report consultation deadline in February.

- 3.18 There is a clear relationship between the existing SRN and the proposals for the future MRN and therefore there will be an interdependency between, and implications of, the consultations and any conclusions drawn from each of them. The Government therefore intends to ensure that the two networks are complementary and that ownership of roads properly reflects their purpose in the transport network.
- 3.19 The next steps are:-
- a formal, DfT consultation response is expected to be published in June 2018;
 - the evidence gathered during this consultation will help inform decisions on the content of RIS2, which is a statutory process; and
 - the DfT expects to announce the result of this process of decision-making in 2019.

Transport for the South East [TfSE] Sub-national Transport Body

- 3.20 The work of the emerging TfSE was reported to the ETS Committee in November 2016. Since that time a considerable amount of progress has been made and a number of milestones achieved, in addition to its work on, and response to, the MRN consultation. These include:-
- Full Shadow Partnership Board [SPB] Meetings and a Visioning Event
 - Active participation of partners and key stakeholders
 - Budget and Business Plan Agreed
 - Commenced Initial Work on a draft Transport Strategy via an Economic Connectivity Review
 - Parliamentary Event at House of Commons of South East MP's
 - Agreeing and initial SRN RIS2 Feedback
 - Arrangement of formal Ministerial Launch Event on 8 May 2018 in Farnborough
 - Recognition of Shadow Body Status from Secretary of State for Transport, Chris Grayling MP.
- 3.21 The SPB will also be expecting to consider a number of other issues in the coming months including the development of draft Statutory Order to formally establish TfSE.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The only alternative to submitting a response to this consultation would be to not do so, or to await this committee's consideration and approval of a response, which would have not met the consultation deadline of 19 March 2018. Neither option is considered appropriate given the significance and implications of having routes in the city that could form part of a nationally recognised road network.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The consultation is a national process and therefore open to anyone to respond to. The consultation has been discussed by The Connected City's Transport Partnership in order to raise awareness of it and encourage responses. Where cross-boundary issues or interest have arisen e.g the A259, officers have worked closely the colleagues in ESCC and WSCC to discuss and arrive at in principle agreement/consensus for certain roads. This accords with the recent decision made by this committee to work jointly with adjacent authorities when considering issues associated with the A259, which have been raised by local residents.

6. CONCLUSION

- 6.1 The proposed creation of a MRN is welcomed, as it presents an opportunity to deliver increased investment in the most economically important 'A' roads managed by local highway authorities. Some of these roads also cross boundaries and will therefore reinforce the role of the city within the Greater Brighton City Region, especially the A259. It is considered essential that the council responds to this important, national consultation on its road network. Officers have therefore prepared and submitted a response to the consultation on behalf of the council in order to meet the consultation deadline of 19 March, in advance of this committee meeting.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no direct financial implications associated with the preparation or submission of the officer response to this consultation or this report and its recommendations, as all activity has been undertaken within the existing revenue budgets available to the City Transport Division during 2017/18.
- 7.2 The Government plans to make additional funding available to maintain and improve the MRN via a specific new funding stream which will be dedicated to investing in this network and raising the performance standards which motorists experience on it. This funding is expected to come from the current Vehicle Excise Duty and will be called the National Roads Fund [NRF]. Subject to the outcome of the consultation and further Government decisions and processes, the NRF is expected to be made available for investment in the MRN in 2020.

Finance Officer Consulted: Gemma Jackson

Date: 02/03/18

Legal Implications:

- 7.3 There are no direct legal implications associated with the preparation or submission of the officer response to this consultation, or this report and its recommendations.

Lawyer Consulted: Elizabeth Culbert

Date: 08/03/18

Equalities Implications:

- 7.4 There are no direct equalities implications associated with either the preparation or submission of the officer response to this consultation, or this report and its recommendations. An Equality Impact Assessment [EqIA] would not usually be carried out in order to respond to a consultation. The DfT has actively considered the needs of blind and partially sighted people in accessing this document, and the text was made available in full on the Department's website. The text could be freely downloaded and translated by individuals or organisations for conversion into other accessible formats.

Sustainability Implications:

- 7.5 There are no direct sustainability implications associated with either the preparation or submission of the officer response to this consultation, or this report and its recommendations.

Corporate / Citywide Implications:

- 7.6 The development and designation of a new MRN will provide an opportunity to secure additional funding to invest in the city's most strategic local roads and is therefore welcomed.

Any Other Significant Implications:

- 7.7 There are no other significant implications associated with either the preparation or submission of the officer response to this consultation, or this report and its recommendations.

SUPPORTING DOCUMENTATION

Appendices:

1. Map illustrating the DfT's proposed Major Road Network and the city council's proposed amendments.
2. Officer response submitted on behalf of the council to DfT's consultation on proposals for the creation of a Major Road Network [MRN].
3. Officer response submitted on behalf of the council to DfT's consultation on the Highways England initial report about the Strategic Road Network [SRN].

Documents in Members' Rooms

1. Government's consultation document 'The creation of a MRN' (December 2017) - also available via:-
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/670527/major-road-network-consultation.pdf
2. Government's consultation document 'Shaping the future of England's strategic roads: consultation on Highways England's Initial Report' (December 2017) – also available via:-
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/666965/shaping-the-future-of-englands-strategic-roads.pdf
3. Response of Transport for the South East [TfSE] Sub-national Transport Body to the MRN consultation

Background Documents

1. Agendas and Minutes of TfSE Shadow Partnership Board meetings (June 2017 to March 2018)
2. BHCC LTP (2015).

Map illustrating the DfT's proposed Major Road Network and the city council's proposed amendments



APPENDIX 2

Officer response submitted on behalf of the council to DfT's consultation on proposals for a Major Road Network [MRN]

DfT Consultation Question	Comments
Core Principles	
1. Do you agree with the proposed core principles for the MRN outlined in this document?	<p>Officers have considered and agree with five of the six proposed core principles, although the exclusive focus on enhancement and major renewals raises concerns about the possible implications for funding necessary revenue investment in repairs.</p> <p><u>Core principles</u></p> <p>The intention for 'Increased Certainty of Funding' is welcomed. This approach will require safeguards within the bidding process to provide confidence in the availability of funding beyond a single five-year period. This will maximise the effectiveness of investment planning. Having 'A Consistent Network' is also key, but only applies to definition rather than standard or user experience. It is agreed that 'Strengthening Links with the SRN' is important and that the MRN and SRN investment programmes must be complementary and fully aligned. This will assist greater strategic and regional co-ordination between authorities and agencies when seeking to achieve a single coherent system of main roads for the benefit of users and the regional economy.</p> <p>As highlighted above, improved standards and performance across the MRN will also depend on having sufficient revenue funding for traffic management, information provision and day-to-day maintenance, as well as additional capital funding for improvements or major renewals. It is therefore considered essential that existing funding arrangements are provided to local highway authorities in proportion to the extent of MRN road for which they are responsible, to enable them to meet the higher expectations and maintenance cost that MRN status will generate.</p> <p><u>Objectives</u></p> <p>The inclusion of 'Support the SRN' is acknowledged, however the priority accorded to MRN improvements on local authority roads should not be significantly influenced by this factor. 'Improving connectivity with the SRN' may be a better term to use as it is recognised that safer and improved flows between the SRN and</p>

DfT Consultation Question	Comments
	<p>MRN are required in some areas, but this should be a priority for Highways England as the responsible agency for the SRN.</p> <p>It is considered that insufficient importance is allocated to environmental and safety considerations within the MRN consultation. Safety is imperative in achieving 'better journeys' and will 'Support all Users'. Environmental issues should also be considered within the 'Reduce Congestion' theme. By broadening the objectives for the MRN, it will be possible to create a much more comprehensive and meaningful set of criteria for investment assessment</p>
Defining the MRN	
<p>2. To what extent do you agree or disagree with the quantitative criteria outlined and their proposed application?</p>	<p>The proposal to use a two-tier traffic flow criterion as the starting point for identifying the most economically important local authority roads is agreed and that AADF (Annual Average Daily Flow) is a suitable unit to help initially identify need/importance.</p> <p>Some further refinements to the flow criteria will also assist in creating a more robust measure. Applying single thresholds of a road with traffic flow only just below 20,000 AADF, and with HGV and LGV proportions only just below the 5% or 15% thresholds is limiting. A ranking/scoring system that enabled a range to be applied e.g 10,000 to 20,000 AADF would provide greater latitude.</p> <p>Use of a single year's flow is also not a robust measure of trends or activity and could be unrepresentative due to temporary peaks or troughs in traffic flow, or equipment faults. Use of a five-year average of traffic count data would be far more reliable. Any inconsistencies would be smoothed out by using the average figure.</p> <p>Officers agree that forecast future traffic growth should not be used to factor up the AADF data and only current data should be used to determine inclusion in the MRN. The starting point for determining the MRN's definition is limited to the set of 'A' roads across England. Some 'B' and 'C' class roads in Brighton & Hove perform an important function in connecting economic activity and also connect with the SRN. It is therefore possible that the MRN project will provide a useful basis on which to review the city's road network, classifications and hierarchy, in line with its LTP.</p>

DfT Consultation Question	Comments
3. To what extent do you agree or disagree with the qualitative criteria outlined and their application?	<p>‘Ensuring a Coherent Network’ is arguably more of a methodological requirement than a significant qualitative requirement to determine the roads to be included in the MRN. The methodology proposed is acceptable. The other two qualitative criteria address the key substantive elements that need to be added, but they are considered to be broad terms that cover several distinct considerations.</p> <p>Other available, national datasets could also be applied, in addition to the set of population centres and gateways or transport hubs identified in the proposal, and these are:-</p> <ul style="list-style-type: none"> • employment density (NOMIS data); • Enterprise Zones and ‘Economic Opportunity Areas’ (as used by Highways England); • proximity of adjacent economic centres (population hubs); • Agreed Diversion Routes from the SRN; and • SRN performance - average speed by link.
4. Have both the quantitative and qualitative criteria proposed in the consultation document identified all sections of road you feel should be included in the MRN?	<p>Working closely with colleagues within the TfSE region, it is considered that the proposed MRN within the consultation does not include all roads that it should in terms of fulfilling and addressing more local and cross-boundary needs. Officers have therefore proposed the following alterations and are recommending that the council supports them :-</p> <ul style="list-style-type: none"> • Include the A259 from ESCC boundary to WSCC boundary • Include the A23 – southern section (from London Road/A270 to A259) • Include the A293 (between the A27 (Hangleton) and A259 (Portslade)) • Delete the A270 (Upper Lewes Road). <p>In summary, these are proposed as they are in line with applying a fuller approach to qualitative criteria and reasons of connectivity, and already meet the quantitative traffic criteria.</p>
5. Have the quantitative or qualitative criteria proposed in the consultation identified sections of road you feel should not be included in the MRN?	<p>Yes – as outlined above in Q4. The A270 Upper Lewes Road proposal should be deleted.</p>
6. Do you agree with the	<p>Officers agree that a balance needs to be struck</p>

DfT Consultation Question	Comments
MRN should be reviewed?	between the consistency and stability of the MRN - for planning, operation, and public perception - and maintaining relevance to the country's needs. The five-year cycle, reviewing the MRN, in a joint exercise with the SRN, is considered appropriate.
Investment Planning	
7. To what extent do you agree or disagree with the roles outlined for local, regional and national bodies	The roles outlined are considered to be reasonable at this stage in the development and definition of the MRN.
8. What additional responsibilities, if any should be included? Please state at which level these roles should be allocated?	<p>The proposed balance of responsibilities across different levels is accepted and the focus on a programme of investment proposals from TfSE as an STB is welcomed in terms of overseeing the MRN on a regional basis. TfSE is best-placed to take on the important strategic role for the MRN and should have full responsibility for the development of its Regional Evidence Base [REB], working closely with local highway authorities and its constituent LEPs and taking account of their Strategic Economic Plans. The cost implications for Highway Authorities for preparatory work for the REB also need to be recognised. It is recommended that the approach to the MRN should be aligned with that for the SRN, whereby funding is allocated within the RIS for scheme development work and strategic studies.</p> <p>Officers welcome the proposed flexibility for regions to design and manage the process of submitting schemes for consideration by the DfT which are supported by the local authority and relevant LEP. There also needs to be sufficient, ongoing flexibility within the region's programme of schemes so that spend can be managed effectively and efficiently.</p> <p>Highway Authorities will have a central role in identifying the need for enhancements to the MRN, ensuring local dialogue feeds in expertise about the most effective solutions, for example in the last mile approach to international gateways. On occasions it is acknowledged that it may be appropriate for TfSE to participate in identifying and prioritising investment proposals, such as those which cross council boundaries and require joint working. The A259 is a recognised example of this within Brighton & Hove, given its connections with WSCC and ESCC.</p> <p>It is accepted that a single local Highway Authority</p>

DfT Consultation Question	Comments
	<p>should take overall responsibility for delivery of each scheme, although in many cases this would be likely to be a lead authority, working closely with neighbouring authorities, as outlined above for Brighton & Hove. It is accepted that the LEP should be an active partner in development plans for the MRN locally, particularly where the primary rationale is completing economic connections. It is important that proposed investments on the MRN align with the delivery of LEP Growth Deals and the emerging Shared Prosperity Fund and that the LEPs have an input into TfSE's overall prioritisation of projects.</p>
<p>9. Do you agree with our proposals to agree regional groupings to support the investment planning of the MRN in areas where no sub-national transport bodies (STBs) exist?</p>	<p>The primary issue that must be addressed in this context is that it is essential strategically that the management of the development of the MRN in non-STB areas take full account of the impacts on neighbouring STBs. In particular, this is important for the TfSE area given that the proximity of and connectivity with London is key to the south-east's economic connectivity and activity. Transport for London will therefore be expected to play an active role in the MRN programme.</p>
<p>10. Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence Base?</p>	<p>It is considered that the Regional Evidence Base must include the role of Highways England's SRN within the region. Any investment proposals for the MRN must be founded on an assessment of the role and relationship between the two networks in combination. It is also critical that the Regional Evidence Base takes account of major investment plans for the rail network which could affect demand for road-based transport, such as the Brighton Main Line.</p> <p>Whilst the proposed fast-tracking of a number of schemes for early entry this year into the MRN Investment Programme means such proposals will not be underpinned by the full Regional Evidence Base, officers recognise the value in making early progress with the MRN concept. Consideration will be given to possible proposals within the city which the council may wish to be fast-tracked.</p>
<p>11. Do you agree with the role that has been outlined for Highways England?</p>	<p>Highways England must play an active role in the MRN Programme. Priorities for the MRN in the TfSE area must take full account of plans in the RIS for the Highways England network. The interrelationship between, and the extent of, the two networks will be further informed by the future results of the recent consultation on Highways England's SRN Initial Report.</p>
<p>Eligibility and Investment Assessment</p>	
<p>12. Do you agree with the</p>	<p>It is understood that across a wide region majority of</p>

DfT Consultation Question	Comments
<p>costs thresholds outline?</p>	<p>cost-effective interventions could fall within the £20-50 million range, and that Packages of Improvement in particular may present a strong case for funding up to the £100 million limit. However, it is recommended that some flexibility is introduced at the lower £20m threshold, particularly where significant schemes could achieve substantial benefits and high value for money on the MRN but would require lower levels of funding, especially in smaller, built-up authority areas such as Brighton & Hove. The improvements that will be achieved in the Valley Gardens area of the city are a good example of this.</p>
<p>13. Do you agree with the eligibility criteria outlined?</p>	<p>In considering these criteria, officers support the inclusion of Packages of Improvements that improve conditions or experiences of all road users in an integrated way, and agree that these could play a crucial part in raising the standard of the MRN and in meeting wider, strategic objectives for the road network within the TfSE region. In some areas and on certain routes, a focus on a package of minor enhancements along an MRN corridor will be the most effective way of addressing deficiencies in the performance and safety of a road, and its environmental impact. The A259 is a good example of this within the city and the Greater Brighton City Region area, where the built environment is constrained and environmental designations are significant. For example, this could include the provision of more sustainable/active travel options which improve priority, safety and convenience while maintaining traffic flow.</p> <p>The proposed approach to key MRN corridors in the phased upgrading of All-Purpose Trunk Roads to expressways set out in Highways England's SRN Initial Report is welcomed as it could provide consistent treatment for longer stretches of road to improve their overall performance for all road users. The roll-out of the expressway concept to the busiest sections of the MRN, as well as the SRN, should be considered in the longer term.</p> <p>It is acknowledged that some 'Widening and Junction Improvements' will be sufficiently large-scale to qualify as MRN schemes in their own right, or indeed could be proposed in combination for a short stretch of road, where investment needs to be more concentrated than for the longer corridor that would be the subject of a Package of Improvements.</p>

DfT Consultation Question	Comments
	<p>‘Major Structural Renewals’ should also play a significant role in raising the condition and standard of the MRN for all road users, and in some areas may be essential in ensuring the network is fully accessible to the levels of freight traffic that need to use it.</p> <p>We welcome the inclusion of schemes focused on ‘VMS, Traffic Management and the Use of Smart Technology and Data’, and expect these to be fully co-ordinated across wide areas and routes rather than single stretches of road. It is essential that any such local system is fully integrated with (and use the same technologies as) existing and proposed new Highways England systems on the SRN. This is particularly important for the city given the A23 and A27 Trunk Roads roles in serving the city’s residents and visitors. In terms of the proposed exclusions from programme eligibility, it is considered essential that all work on the SRN itself should be funded by Highways England through the RIS, despite the reference to some schemes on the SRN being of a ‘distinct local sub-national nature’ which could qualify for MRN funding.</p> <p>In terms of public transport improvements, it is essential that this process should enable a substantial element of provision and prioritisation for passengers travelling by bus and coach in plans for enhancing the MRN. As outlined above, public transport plays a significant role in reducing congestion, the first of the objectives for the MRN, as well as helping meet other objectives. All MRN roads should provide for, or support, better access to bus and coach services as a means of ensuring the whole network can be used as efficiently as possible.</p> <p>Public transport, and other alternatives to the private car, are expected to form a central component of a distinct approach to the needs of MRN corridors that are within or pass through, urban areas. Within the proposed MRN for Brighton & Hove, some roads will serve the needs of ‘place’ (as significant or local destinations) as much as ‘movement’. The maintenance, management and improvement of such roads or corridors in the city are established within the context of its wider transport (and land use) policies, as set out in the City Plan (Part 1) and LTP.</p> <p>The revenue spending implications of all capital investments must be addressed through changes to the</p>

DfT Consultation Question	Comments
	existing Highway/Transport revenue funding processes and decisions for local councils. It is accepted that the day-to-day maintenance of the MRN will remain the responsibility of local Highway Authorities via existing funding allocations. It is essential that the council's local highways maintenance funding should not be adversely affected by the creation of the MRN and its associated funding process.
14. Do you agree with the investment assessment criteria outlined?	Yes. It is also considered that a more inclusive approach to investment in the MRN will be achieved from a wider range of stakeholders if the environmental impacts currently noted under the 'Reduce Congestion' heading were highlighted separately. This would also enable issues such as severance and design to be taken into account within MRN investment proposals and decisions
15. In addition to the eligibility and investment assessment criteria described what, if any, additional criteria should be included in the proposal? Please be as detailed as possible.	It is recommended that some adjustments to the criteria are required. Regarding 'Support All Road Users', the safety and security of all users is paramount and a high priority. The focus on journey quality for users is also key, irrespective of which roads are used (MRN or SRN) especially when considering end-to-end journey times, reliability and resilience.
Other Considerations	
16. Is there anything further you would like added to the MRN proposals?	It is essential that the MRN designation and its associated investment priorities improve the performance of the roads within it. This will enable the MRN to achieve its objective of supporting the economy and planned growth. The MRN will be managed and funded alongside the SRN, which is now subject to a detailed performance specification, carefully monitored by the Office of Rail and Road. At a regional and national level, it may be desirable or necessary to seek to create a similar arrangement for the MRN. The success of the MRN programme will be achieved by continuous investment in appropriate improvements that assist in improving road users' experiences of roads included in the network. To achieve this, councils require adequate and balanced levels of capital and revenue funding. The consistency of standards of infrastructure of MRN roads is also important, as it varies greatly now. It will be important to ensure that all roads in the MRN meet a certain minimum standard of capability, particularly with regard to HGV traffic and highway structures.

Officer Response on behalf of Brighton & Hove City Council to DfT's Consultation on HE's 'Shaping the Future of England's Strategic Roads: Initial Report'

Question 1 - Do you think Highways England's proposals will deliver what users of the SRN want? If not, what could be done differently?

The approach taken to prepare the Initial Report includes extensive research in order to inform the HE's 9 investment priorities. However, greater consideration and advice about the relative importance of each of the priorities would assist the council in its consideration of the HE's future investment strategy in the SRN.

Question 2 - Do you think Highways England's proposals will deliver what businesses want? If not, what could be done differently?

The needs and views of the broad spectrum of businesses within the city and the wider Greater Brighton City Region vary, and the council therefore very much hopes that they, or the umbrella organisations that represent them or that they participate in, have submitted their own responses to this consultation.

A strong case was made for improvements to the SRN within the Coast to Capital LEP's original SEP in 2014, which the council assisted in preparing and supported in principle. Primarily focused on the east-west A27 corridor, recognition of the role of the ports and airports within the City Region in terms of the movement of goods and people, and their connectivity and reliance on the SRN, is particularly key to the city's economy.

Question 3 - Do you think Highways England's proposals meet the needs of people affected by the presence of the SRN? If not, what could be done differently?

The consideration of noise, air quality and visual impacts on local communities and environments within the Report are clear. However, the impacts associated with the severance that A27 has on the northern periphery of the city are acute in some locations.

In Brighton & Hove, the A27 is crossed by a number of local Highway Authority roads and/or public rights of way, which are used by non-motorised users [NMUs]. Therefore, it can represent an east-west barrier to achieving comprehensive and continuous north-south connections between the built-up area and its rural hinterland and green/open spaces, especially when considering the proximity and attraction of the environmentally designated landscape of the South Downs National Park which includes Stanmer Park, Ditchling Beacon and Devil's Dyke. Problems can also be experienced by some other local road-users at certain times of the day owing to the levels of traffic using or joining the Trunk Roads.

In response to RIS2, the council has previously highlighted the need for measures on the local road network connections to/from the SRN. For example, the creation of a new, shared surface cycle and pedestrian path along Ditchling Road between the edge of the city has highlighted an issue whereby its continuation across the A27 directly into the National Park has

not been possible due to sub-standard parapet heights on the Ditchling Road overbridge. To overcome these safety/severance issues requires the introduction of appropriate changes to parapet design/height.

The designated funds to mitigate the adverse impacts of the SRN and address the needs of those affected are welcomed, especially those related to sustainable travel and transport. Consistent and comprehensive approaches to consultation and engagement with local communities as well as stakeholders and partners will also ensure that any proposals are suitable and acceptable to meeting the needs of those affected by the SRN.

Question 4 - Do you agree with Highways England's proposals for:

<p>Four categories of road and the development of Expressways (Initial Report sections 4.4.3 and 5.3.6) ?</p>	<p>The four categories of roads identified are welcomed and supported. The approach highlights the need to adopt the concept of a road hierarchy with different functionality being attached to each category.</p> <p>The principle of introducing Expressways is generally welcomed as it takes a comprehensive approach to improvements that will maximise the benefits road users and should deliver better and more reliable journey times on the SRN.</p> <p>The indicative plan showing the potential introduction of Expressways on SRN A roads in the wider south-east area is welcomed and supported, given that it includes the A23 and parts of the A27. The council is also keen to ensure that the A roads will be upgraded to expressways and continued consideration will need to be given to those sections of road which will remain all-purpose trunk road category at the bottom of the hierarchy to ensure that they are brought up to a higher standard along their entire length. For example the A259 from Brenzett in Kent heading to Hastings in East Sussex is of markedly lower quality and consideration should be given to upgrading the route.</p>
<p>Operational priorities (Initial Report section 5.1)?</p>	<p>The operational priorities identified are a key part of the effective and efficient day-to-day running of the SRN, and adequate funding to enable their continued maintenance and management to address increasing demand and use by all road users, including NMUs, is essential.</p> <p>Particular support is expressed for:-</p> <ul style="list-style-type: none"> ➤ the use of real-time information to improve the access to, quality of, and integration of information for all forms of transport for users, to enable them to make more informed decisions before or during their journeys; ➤ improvements to SRN diversion routes, focused on their condition and signage; ➤ the commitment to improve the co-ordination of traffic management activities with local highway authorities to improve traffic flow between the two networks; ➤ supporting the use of electric vehicles to enable drivers to contribute towards the reduction of emissions which are harmful

	to both public health and the environment.	
Infrastructure priorities (Initial Report section 5.2)?	A planned and proactive approach to maintenance based on extending the life of assets or replacing those in need to maintain the performance of the network is one that is also adopted, and supported, by the council. However, the council also recognises the difficulties faced by the HE in prioritising and funding such an approach with limited funds as it is also experiencing a significant maintenance backlog on its local road network in terms of road and footway surfaces, drainage, structures and street lights. Ensuring that infrastructure priorities and the investment in them ensures safety, economic connectivity and environmental enhancement are achieved requires a balanced and transparent approach.	
Enhancement priorities (Initial Report section 5.3)?	<i>Completing RIS1 schemes</i>	The council participated in, and supported, the list of priority schemes submitted for potential inclusion in RIS2 submitted by TfSE in 2017. The council remains concerned that delays to RIS1 scheme delivery will adversely affect the amount of funding available for the RIS2 programme and will therefore await the DfT's publication of the RIS2.
	<i>Strategic studies and other studies</i>	Strategic studies are supported and should continue as they will be the primary basis for identifying longer term solutions to a number of challenges on the SRN and the associated delivery programmes.
	<i>RIS1 for RIS2 schemes</i>	The development of possible designs for a number of additional schemes which could be part of the RIS2 process if they can demonstrate good value for money, deliverability and affordability is supported to ensure that the RIS programme is able to deliver the maximum level of benefit within the timeframes and available funding.
	<i>Smart upgrades to the busiest motorways</i>	Adopting technological and innovative solutions to managing <u>all</u> roads will be a fundamental part of the evolving, future approach to increasing the efficiency of the SRN and supporting economic connectivity. It is therefore important to recognise that measures on roads that connect with the SRN will also be required to achieve improvements that will offer seamless journeys, and which will need to include providing for, and encouraging, greater use of sustainable forms of transport.
	<i>Developing expressways</i>	Please refer to the above response to Question 4.
	<i>New schemes</i>	The development of a regularly reviewed and refreshed pipeline of improvement schemes for the SRN is supported and will ensure that economic connectivity continues to be the focus of the available funding.
	<i>Tackling local</i>	The continued use of designated funds to support the

	<i>priorities</i>	delivery of local priorities on growth and housing, environment, cycling, safety and integration, innovation and air quality is supported.
	<i>Co-ordination with HS2 and Heathrow Airport expansion</i>	The council has no formal view about the co-ordination of the SRN and either of these proposals.
	<i>A stable pipeline of improvements</i>	This is supported, as indicated in above responses to this consultation, in order to maximise the efficiency and effectiveness of the SRN. It will also be necessary to ensure that any complementary schemes or improvements on the local road network are brought forward in a similar way and at a similar pace.
A local priorities fund (Initial Report section 5.3.8)?	As indicated in previous responses to this consultation, the council supports the continued use of designated funds to support the delivery of local priorities on growth and housing, environment, cycling, safety and integration, innovation and air quality.	
Future studies (Initial Report section 5.3.11)?	The council supports the programme of future studies to support the development of a wider range of solutions across the network to assist in helping to identify location-specific improvements that will improve the economic connectivity of the SRN network.	
Designated funds (Initial Report section 5.4)?	As previously stated in above responses to this consultation, the council supports the continued use of the designated funds to support the delivery of local priorities on growth and housing, environment, cycling, safety and integration, innovation and air quality.	
Performance measures and targets (Initial Report section 6.3)?	The development of a comprehensive and informative Performance Framework that covers all relevant goals and objectives and enables improvements to be achieved for both road users and stakeholders, and HE as an organisation, is supported.	

Question 5 - Are there any other proposals in the Initial Report that you do not agree with? If so, which ones and what could be done differently?

There are no other proposals in the Report that the council does not agree.

Question 6 - Do you agree with Highways England's assessment of the future needs of the SRN (Initial Report section 4.4)?

The council considers that Highways England's assessment of the future needs of the SRN, which includes social and technological changes that are likely to affect travel and the SRN in

the future as part of scenario planning, is sufficient to enable it to plan head, although a more proactive approach to considering the effects of potential technological changes.

Question 7 - How far does the Initial Report meet the Government's aims for RIS2 (economy, network capability, safety, integration and environment – described in paragraph 2.3)? Which aims could Highways England do more to meet and how?

The importance of new housing to the Government's overall economic strategy is significant and therefore this needs to be reflected in RIS2, as it is a key determinant in the amount and location of mitigation that is required on the SRN and wider transport network to enable planned growth to be accommodated.

Question 8 - Do you think there should be any change in the roads included in the SRN (described in paragraph 1.3)? If so, which roads would you propose are added to or removed from the SRN, and why?

The council does not seek to achieve any change in the roads included in the SRN.

Question 9 - Is there anything else we need to consider when making decisions about investment in the SRN? If so, what other factors do you want considered? Please provide links to any published information that you consider relevant.

In addition to the current survey and research database used by Highways England, the DfT should ensure that it seeks the full views of the Coast to Capital LEP and Greater Brighton City Region to ensure that the SRN requirements of those wider economic functional areas which the city of Brighton & Hove supports are taken into account.

Question 10 - Does the analytical approach taken have the right balance between ambition, robustness, and proportionality? If not, what do you suggest we do differently?

The analytical approach taken is considered to be balanced, but needs to be regularly reviewed and refreshed to ensure that it remains current and takes account of the effects of future growth and technological change on the SRN.

AJR

7/2/18

Subject:		Blue Badge Parking Bays Traffic Orders	
Date of Meeting:		20th March 2018	
Report of:		Executive Director of Economy, Environment & Culture	
Contact Officer:	Name:	Dionne Ayres	Tel: 01273 292181
	Email:	Dionne.ayres@brighton-hove.gov.uk	
Ward(s) affected:		East Brighton, Hanover & Elm Grove, Preston Park, Queens Park & Regency	

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

- 1.1 The Parking Infrastructure Team receives a number of requests for blue badge parking bays within the Controlled Parking Zones and outside of these areas. These requests are most often from residents, but can also be from other services. If it is decided that the request is justified then it is advertised on a Traffic Regulation Order.
- 1.2 This report considers the objections received to amendment Traffic Regulation Orders advertised over the last few months.

2. RECOMMENDATIONS:**April 17 Blue Badge Parking Bays Citywide Order**

- 2.1 That the Committee is recommended to (having taken into account of all the duly made representations and objections) agree the following:
 - a) Approve the Various Controlled Parking Zones Consolidation Order 2015 Amendment Order No.* 201* and Brighton & Hove (Waiting & Loading/Unloading Restrictions and Parking Places) Consolidation Order 2008 amendment Order No.* 201*.

September 17 Blue Badge Parking Bays Citywide Order

- 2.2 That the Committee is recommended to (having taken into account of all the duly made representations and objections) agree the following:
 - a) Approve the Various Controlled Parking Zones Consolidation Order 2015 Amendment Order No.* 201* and Brighton & Hove (Waiting & Loading/Unloading Restrictions and Parking Places) Consolidation Order 2008 amendment Order No.* 201*.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Two Traffic Regulation orders were advertised in 2017 which have received objections. The blue badge parking bays that received objections were withdrawn and are presented in this committee report. This allowed the other disabled bays to proceed last year. The comments, support and objections are summarised and explained in detail in Appendix A and plans showing the proposals which have received comments or objections are shown in Appendix B.

April 17 Blue Badge Parking Bays Citywide Order

- 3.2 This Traffic Order includes proposed restrictions to over 50 roads citywide. A number of objections were received to the advertised Traffic Regulation Order
- 3.3 In particular objections were received in relation to the following proposals:
- a) Vernon Terrace (Regency – Controlled Parking Zone Y) – Proposed removal of blue badge parking place outside No.7, outside No.23 & outside No.29
 - b) Bernard Road (Hanover & Elm Grove) – Proposed removal of blue badge parking place outside No.72

September 17 Blue Badge Parking Bays Citywide Order

- 3.4 This Traffic Order includes proposed restrictions to over 50 roads citywide. A number of objections were received to the advertised Traffic Regulation Order
- 3.5 In particular objections were received in relation to the following proposals:
- a) Clifton Place (Regency – Controlled Parking Zone Z) – Proposed blue badge parking place outside No.3
 - b) Maresfield Road (East Brighton – Controlled Parking Zone H) – Proposed removal of blue badge parking place outside No.20
 - c) Stanford Road (Withdean – Controlled Parking Zone Q) – Proposed removal of blue badge parking place outside No.13
 - d) Sutherland Road (Queens Park – Controlled Parking Zone Q) – Proposed removal of blue badge parking place outside No.41
 - e) Manor Way (East Brighton) – Proposed removal of blue badge parking place opposite No.2

Summary of Objections

April 17 Blue Badge Parking Bays Citywide Order

- 3.6 **Vernon Terrace** – There have been 4 objections to the proposed removal of 3 blue badge parking bays. This was requested by a resident as the bays are not used and there is a shortage of permit parking spaces. No resident in the vicinity

has made an application for any of the bays or meets the relevant criteria to qualify for these bays. Therefore, it is proposed to proceed with the removal of these blue badge parking bays.

- 3.7 **Bernard Road** - There has been 1 objection to the proposed removal of this blue badge parking bay. This was requested by a resident as the bay was not being used. The original applicant no longer meets the criteria to qualify for the bay as they no longer have a vehicle, so the bay is empty except for when the resident is picked up and dropped off for appointments and days out. Therefore, it is proposed to proceed with the removal of this blue badge parking bay.

September 17 Blue Badge Parking Bays Citywide Order

- 3.8 **Clifton Place** – There have been 5 objections to the proposed blue badge parking bay. This bay was applied for by a resident in the vicinity who met the all the requirements of the application. Therefore, it is proposed to proceed with this blue badge parking bay.
- 3.9 **Maresfield Road** – There has been 1 objection to the proposed removal of this blue badge parking bay. This was requested by a resident as the bay is not always used. The original applicant does not meet the criteria as the blue badge holder does not live at the property and is only a visitor. Therefore, it is proposed to proceed with the removal of the blue badge parking bay.
- 3.10 **Stanford Road** – There has been 1 objection to the proposed removal of this blue badge parking bay. This was requested by a resident as the original applicant has passed away. No resident in the vicinity has made an application for the bay or meets the relevant criteria to qualify for the bay. Therefore, it is proposed to proceed with the removal of this blue badge parking bay.
- 3.11 **Sutherland Road** - There has been 1 objection to the proposed removal of this blue badge parking bay. This was requested by a resident as the bay is no longer required by the applicant. No resident in the vicinity has made an application for the bay or meets the relevant criteria to qualify for the bay. Therefore, it is proposed to proceed with the removal of this blue badge parking bay.
- 3.12 **Manor Way** There has been 2 objections to the proposed removal of this blue badge parking bay. This was being removed as the road markings were no longer visible and the bay was not used. No resident in the vicinity has made an application for the bay or meets the relevant criteria to qualify for this bay. Therefore, it is proposed to proceed with the removal of this blue badge parking bay.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The main alternative option is doing nothing which would mean the proposals would not be taken forward.
- 4.2 However, it is the recommendation of officers that the recommended proposals are agreed for the reasons outlined within the report.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Detailed plans and all the orders were available on the Council website and could be viewed using the public computers at Customer Service Centres at Bartholomew House, Bartholomew Square, Brighton and Hove Town Hall, Ground Floor, Norton Road, Hove.
- 5.2 The Ward Councillors for each area were consulted for all Traffic Regulation orders, as were the statutory consultees such as the Emergency Services.

April 17 Blue Badge Parking Bays Citywide Order

- 5.3 The April 17 Blue Badge Parking Bays Citywide Traffic Regulation Order was advertised between the 5th May 2017 and 26th May 2017.
- 5.4 Notices were also put on street for the 4th May 2017; these comprised of the notice as well as a plan showing the proposal and the reasons for it. The notice was also published in The Brighton Independent newspaper on the 5th May 2017.

September 17 Blue Badge Parking Bays Citywide Order

- 5.5 The September 2017 Blue Badge Parking Bays Citywide Traffic Regulation Order was advertised between the 13th October 2017 and 3rd November 2017.
- 5.6 Notices were also put on street for the 23th October 2017; these comprised of the notice as well as a plan showing the proposal and the reason for it. The notice was also published in The Brighton Independent newspaper on 13th October 2017.

6. CONCLUSION

- 6.1 It is proposed that the recommendations are agreed due to the detailed reasons outlined in the report.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The costs associated with the report recommendations will be funded from the existing Parking Infrastructure revenue budget within the Transport service.
- 7.2 Any potential impacts on parking income associated with the recommendations will impact on the existing Parking revenue budget within the Transport service. It is estimated that the impact on parking income would be immaterial and therefore not require any amendments to current budgeted assumptions; however, this will be reviewed as part of the Targeted Budget Monitoring process.

Finance Officer Consulted: Gemma Jackson

Date: 01/02/18

Legal Implications:

- 7.3 Before making Traffic Orders the Council must consider all duly made unwithdrawn objections. Where there are unresolved objections to a Traffic Order then the matter is referred to the Environment, Transport & Sustainability Committee for a decision.
- 7.4 Under the Road Traffic Regulation Act 1984 the Council has the power to provide parking places on any part of a road for the purpose of relieving or preventing congestion of traffic. The Council's powers and duties under the Highways Act 1980 and the Road Traffic Regulation Act 1984 must be exercised to secure the expeditious, convenient and safe movement of traffic. The actions detailed in this report will assist in demonstrating that the Council is complying with its statutory duty as highway authority.

Lawyer Consulted: Stephanie Stanmers

Date: 07/03/18

Equalities Implications:

- 7.5 The proposed measures will be of benefit to many road users.
- 7.6 The legal disabled bays will provide parking for the holders of blue badges wanting to use the local facilities

Sustainability Implications:

- 7.7 There are no Sustainability implications

Any Other Significant Implications:

- 7.8 There are no other significant implications

SUPPORTING DOCUMENTATION

Appendices:

1. Summary of representations received
2. Plans showing the proposals

Documents in Members' Rooms

1. None

Background Documents

1. None

APPENDIX A – Summary of representations received

Apr 17 DPB Citywide Traffic Regulation order

Who	Road / Ward	Object / Support	Contents	Comments/Recommendations
Resident	Vernon Terrace – Controlled Parking Zone Y	Objection	<u>Removal of Blue Badge Parking Bays outside No.7 ,No.23 & No.29 Vernon Terrace</u> – Object to the removal of these bays as a regular visitor to Vernon Terrace who relies on these blue badge parking spaces	<u>Removal of Blue Badge Parking Bays outside No.7 ,No.23 & No.29 Vernon Terrace</u> – This was requested by a resident as the bays are not used and there is a shortage of permit parking spaces. The bays are to be removed as no one has made an application for any of the bays or meets the relevant criteria to qualify for a bay.
Resident	Vernon Terrace – Controlled Parking Zone Y	Objection	<u>Removal of Blue Badge Parking Bays outside No.7, No.23 & No.29 Vernon Terrace</u> - Objects to the removal of these bays as have regular visitors that need to use the bays and also there is a nearby doctor's surgery and some patients use these bays while visiting the surgery.	<u>Removal of Blue Badge Parking Bays outside No.7 ,No.23 & No.29 Vernon Terrace</u> – As above
Resident	Vernon Terrace – Controlled Parking Zone Y	Objection	<u>Removal of Blue Badge Parking Bays outside No.7 Vernon Terrace</u> - Objects to the withdrawal of the disabled bay outside 7 Vernon Terrace as the reason given is that it is no longer required, but the bay is almost constantly used.	<u>Removal of Blue Badge Parking Bays outside No.7 Vernon Terrace</u> – This was requested by a resident as this bay is not used and there is a shortage of permit parking spaces. The bay is to be removed as no one has made an application for the bay or meets the relevant criteria to qualify for a bay.

Resident	Vernon Terrace – Controlled Parking Zone Y	Objection	<u>Removal of Blue Badge Parking Bays outside No.7, No.23 & No.29 Vernon Terrace</u> - Objects to the removal of all these bays in Vernon Terrace. As the Doctors Surgery has many disabled patients who use them. Understand that there are residents who need more spaces but would it not be fair if just 1 bay was removed instead of all of them.	<u>Removal of Blue Badge Parking Bays outside No.7 ,No.23 & No.29 Vernon Terrace</u> – This was requested by a resident as the bays are not used and there is a shortage of permit parking spaces. The bays are to be removed as no one has made an application for any of the bays or meets the relevant criteria to qualify for a bay.
Resident	Hanover & Elm Grove – Controlled Parking Zone S	Objection	<u>Removal of Blue Badge Parking Bay outside No.72 Bernard Road</u> - Objects to the removal of the bay outside 72 Bernard Road as the bay is still required for picking up and dropping off resident who no longer has a vehicle. The resident is unable to leave the house unaccompanied and has lost all confidence since having several falls in the last few months. Removing this bay will render the applicant virtually housebound as they would have great difficulty accessing vehicles double parked.	<u>Removal of Blue Badge Parking Bay outside No.72 Bernard Road</u> – This was requested by a resident as the bay was not being used. The bay is to be removed as the original applicant no longer meets the criteria to qualify for the bay as they no longer have a vehicle and the bay is empty for a majority of the time.

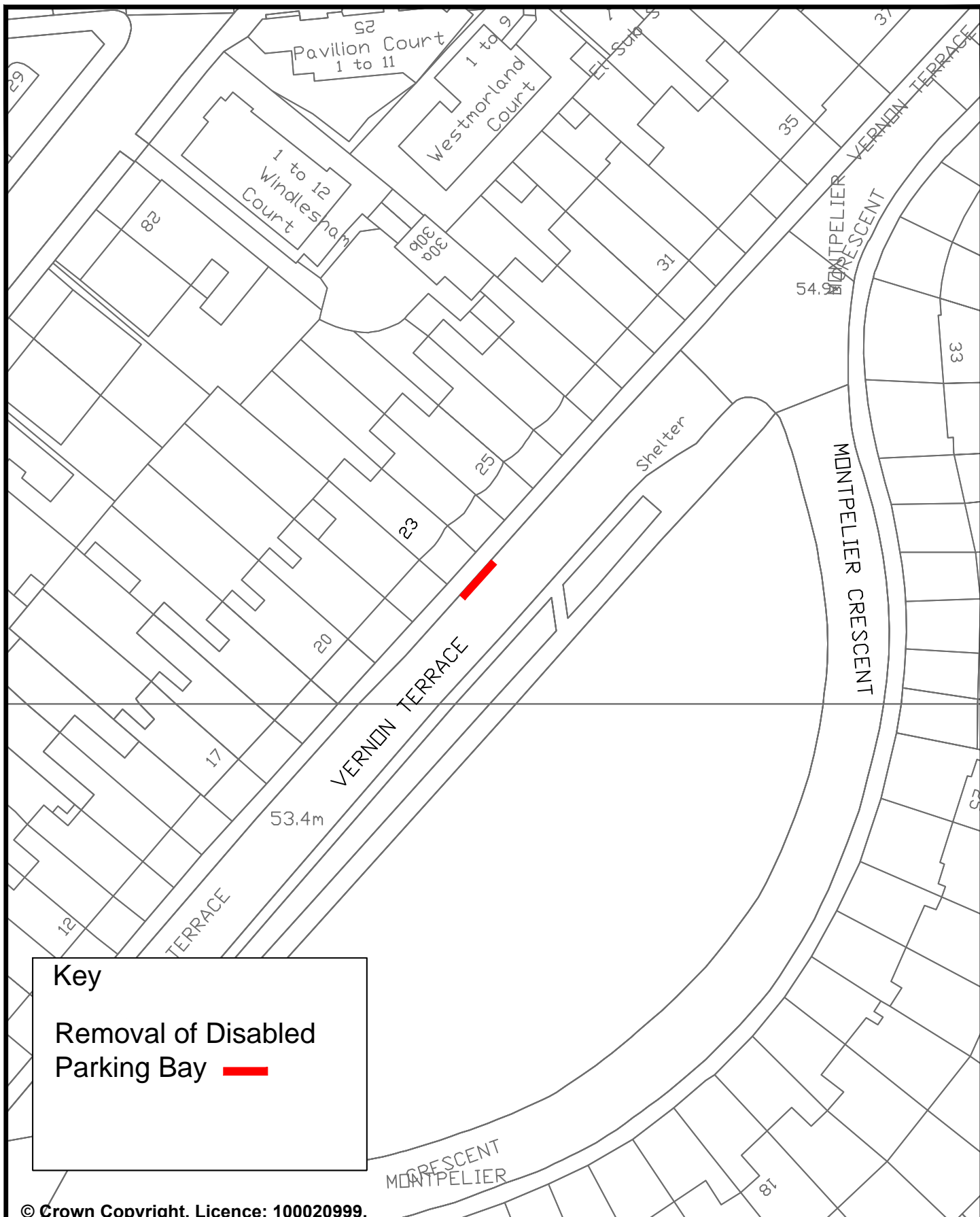
Sept 17 Blue Badge Parking Bays Citywide Traffic Regulation Order

Who	Road / Ward	Object / Support	Contents	Comments/Recommendations
Resident	Clifton Place – Controlled Parking Zone Z	Objection	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> - Objects to the proposed blue badge parking bay in Clifton Place as there is a shortage of both residents and pay & display parking places in this area.	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> – This was requested by a resident in the vicinity. The bay is to be implemented as the resident has met the all the requirements of the blue badge parking bay application.


Resident	Clifton Place – Controlled Parking Zone Z	Objection	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> - Objects to the proposed blue badge parking bay in Clifton Place as there is ample parking at the bottom of the street next to Western Road and there is insufficient parking for residents and quite often residents do not have any parking spaces available.	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> – As Above.
Resident	Clifton Place – Controlled Parking Zone Z	Objection	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> - Objects to the proposed blue badge parking bay in Clifton Place as there is already a shortage both residents' and pay & display parking places in this area. There are only 10 dedicated resident's parking bays in the road and feel that to reduce the number of residents permit bays is inequitable.	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> – As Above.
Resident	Clifton Place – Controlled Parking Zone Z	Objection	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> – Objects to the proposed blue badge parking bay in Clifton Place as badge holders seem to have the right to park wherever they please on Clifton Place/Spring Street/Hampton Street. It is not necessary to provide a dedicated blue badge parking bay on Clifton Place. In doing so, the ones with no blue badges are discriminated against	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> – As Above.
Resident	Clifton Place – Controlled Parking Zone Z	Objection	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> - Objects to the proposed blue badge parking bay in Clifton Place as losing a parking would bring more chaos to residents. Surely if someone is disabled then they would have a blue badge that would allow them to park anywhere so there would be no need for a disabled bay.	<u>Proposed Blue Badge Parking Bay outside No.3 Clifton Place</u> – As Above.
Resident	Maresfield Road – Controlled	Objection	<u>Removal of Blue Badge Parking Bay outside No.20 Maresfield Road</u> - Objects to the removal of the blue	<u>Removal of Blue Badge Parking Bay outside No.20 Maresfield Road</u> – This was

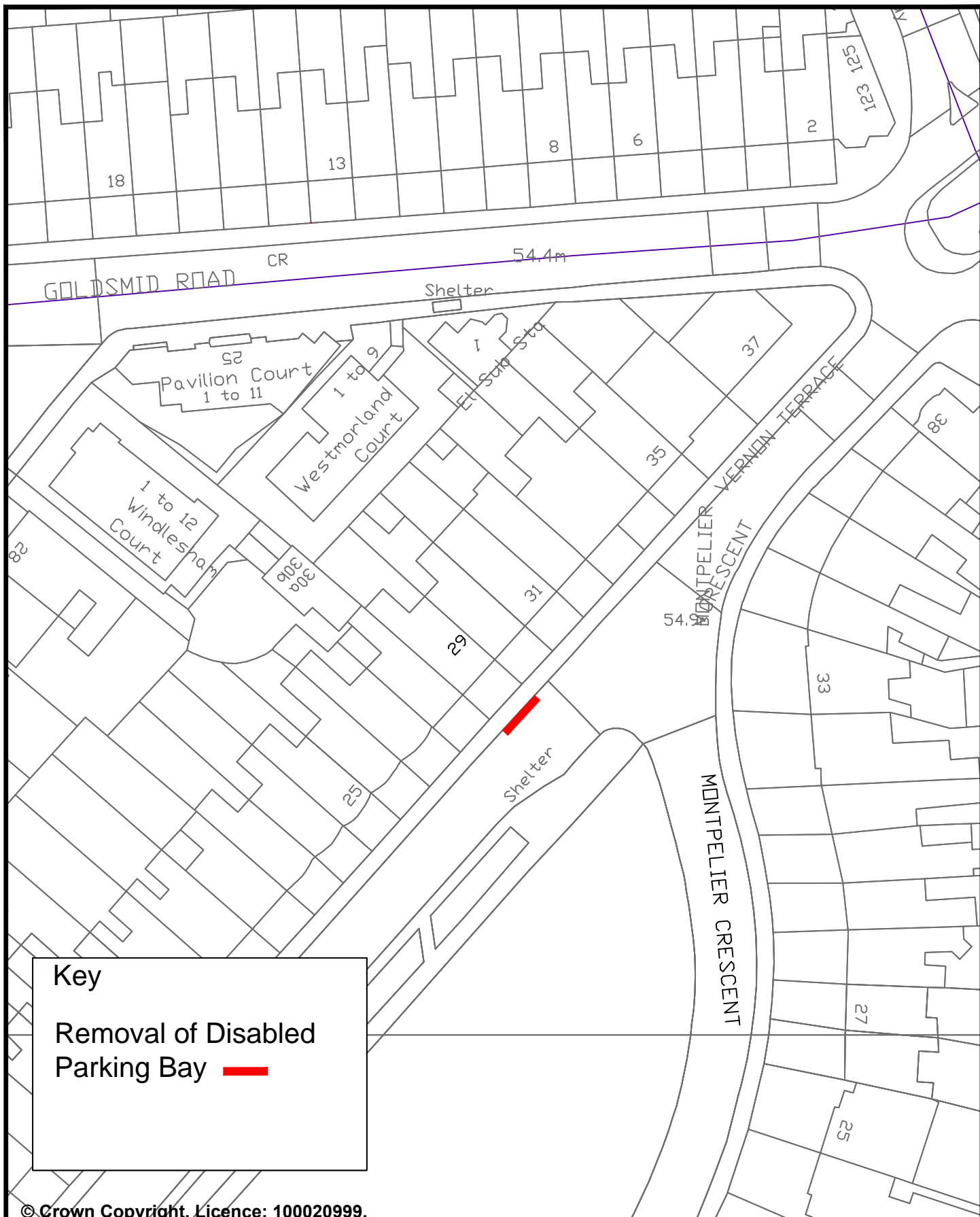
	Parking Zone H		badge bay in Maresfield Road. They are a carer to a regular visitor to the property and the mobility vehicle is registered at this address in Maresfield Road. Therefore, needs to use the bay.	requested by a resident as the bay is not always used. The bay is to be removed as the original applicant does not meet the criteria as the blue badge holder does not live at the property and is only a visitor.
Resident	Stanford Road – Controlled Parking Zone Q	Objection	<u>Removal of Blue Badge Parking Bay outside No.13 Stanford Road</u> - Objects to the removal of the blue badge bay in Stanford Road. As a regular visitor to Stanford Road rely on the use of the blue badge parking bay. If the bay is removed, will have to find a Pay and Display parking space that is very difficult to find in this area.	<u>Removal of Blue Badge Parking Bay outside No.13 Stanford Road</u> - This was requested by a resident as the original applicant has passed away. The bay is to be removed as no resident in the vicinity has made an application for the bay or meets the relevant criteria to qualify for the bay.
Resident	Sutherland Road – Controlled Parking Zone U	Objection	<u>Removal of Blue Badge Parking Bay outside No.41 Sutherland Road</u> - Objects to the removal of blue badge parking bay in Sutherland Road as there is a need for more blue badge bays in the area in particular around the pub, take-away and the shops and the deletion of one bay has a knock-on effect on the blue badge bays around. It takes a long time to put a new "non-specific" bay in (i.e. one which is not related to a person/house ; or e.g. Monday to Sunday - 9am to 6pm - Maximum Stay 3 hours (No return within 1 hour)) and in the meantime the area needs more such bays not fewer	<u>Removal of Blue Badge Parking Bay outside No.41 Sutherland Road</u> - This was requested by a resident as the bay is no longer required by the applicant. The bay is to be remove as no resident in the vicinity has made an application for the bay or meets the relevant criteria to qualify for the bay
Resident	Manor Way – East Brighton	Objection	<u>Removal of Blue Badge Parking Bay opposite No.2 Manor Way</u> - Objects to the removal of blue badge parking bay in Manor Way. As Robert Lodge North, a new block of six council flats has two flats built to specification for people with mobility needs. This bay is use regularly and it makes a difference for the	<u>Removal of Blue Badge Parking Bay opposite No.2 Manor Way</u> – This was being removed as the road markings were no longer visible and the bay was not used. No resident in the vicinity has made an application for the bay or meets the

			disabled residents of Robert Lodge North being able to get into cars safely or not. While the two households currently living in the accessible flats do not own cars they do regularly go out with others who arrive by car and need a space to park with blue badges so they can safely get in and out.	relevant criteria to qualify for this bay.
Resident	Manor Way – East Brighton	Objection	<u>Removal of Blue Badge Parking Bay opposite No.2 Manor Way</u> - Objects to the removal of blue badge parking bay in Manor Way as use this bay on a fairly regular basis when providing transport to a resident who lives in the new, disabled-accessible, development at Robert Lodge North. Find the proposal to remove the nearest Blue Badge bay to Robert Lodge North less than a year after the council have opened its new disabled-accessible housing development at Robert Lodge rather strange.	<u>Removal of Blue Badge Parking Bay opposite No.2 Manor Way –</u> As Above.



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Brighton & Hove City Council, 2012.		TRANSPORT	PARKING INFRASTRUCTURE
Address: 23 Vernon Terrace, Brighton	Scale : N.T.S.		
	Date : Feb 2017		
Reason: Bay being removed as no longer required	Drawn : DLA		
	Drawing Number : B&H-DPB-CPZY-002		



Key

Removal of Disabled
Parking Bay —

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Brighton & Hove City Council, 2012.

Address: 29 Vernon Terrace,
Brighton

Reason: Bay being removed as no
longer required

TRANSPORT

PARKING INFRASTRUCTURE

Scale : N.T.S.

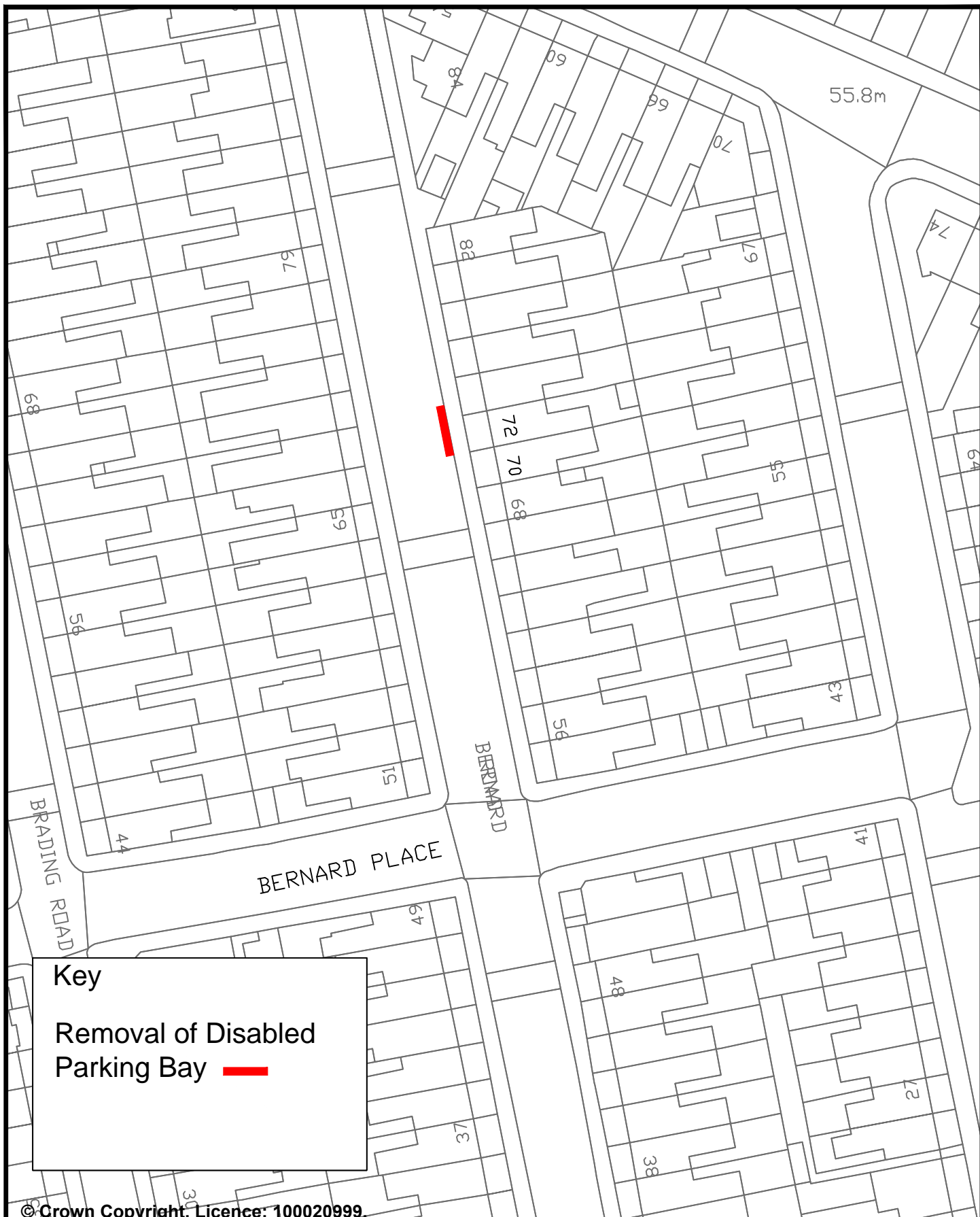
Date : Feb 2017

Drawn : DLA

Drawing Number : B&H-DPB-CPZY-003



Brighton & Hove



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Brighton & Hove City Council, 2012.

Address: 72 Bernard Road,
Brighton

Reason: Bay being removed as no
longer required

TRANSPORT

PARKING INFRASTRUCTURE

Scale : N.T.S.

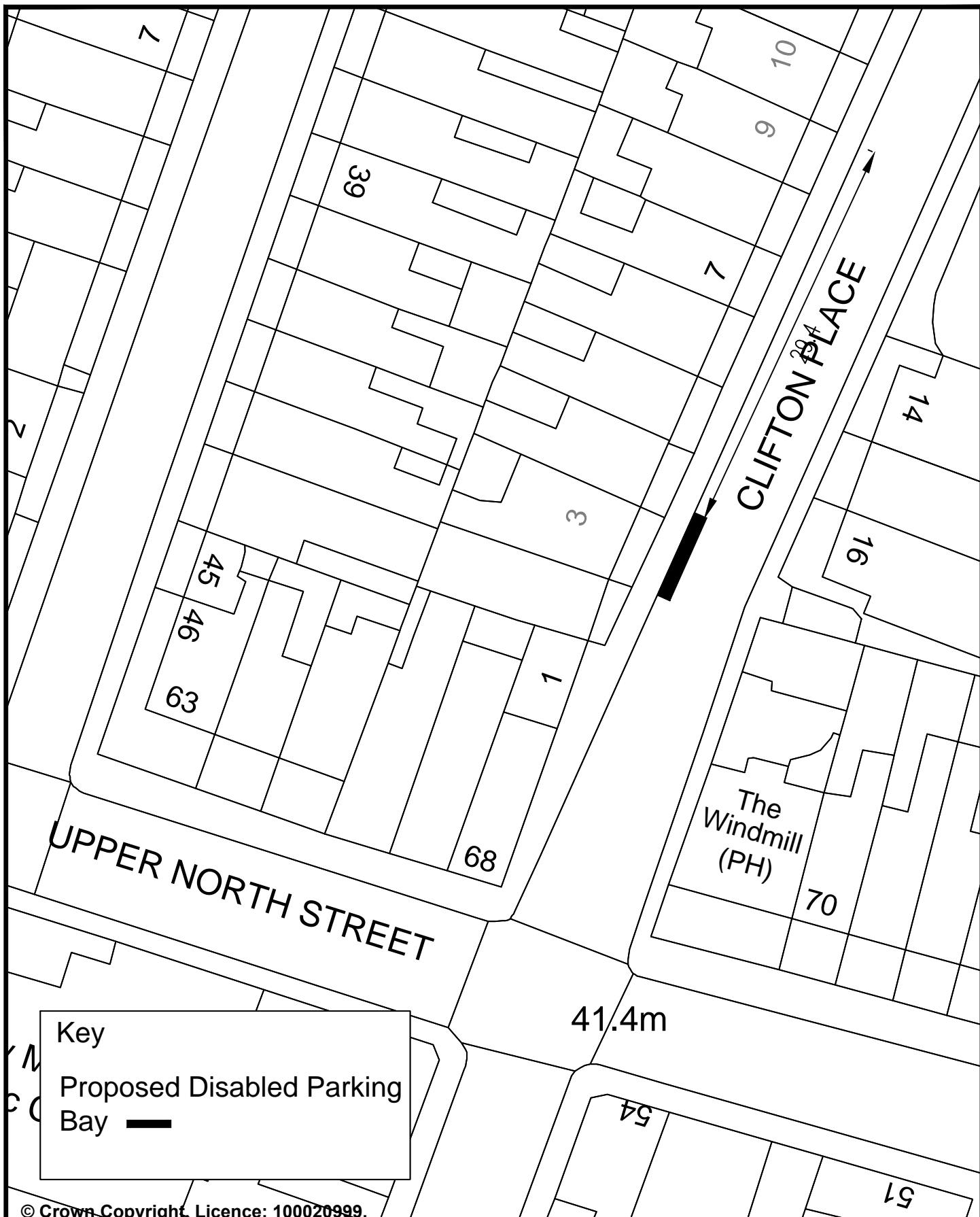
Date : FEB 2017

Drawn : DLA


Drawing Number : B&H-DPB-RVK-011

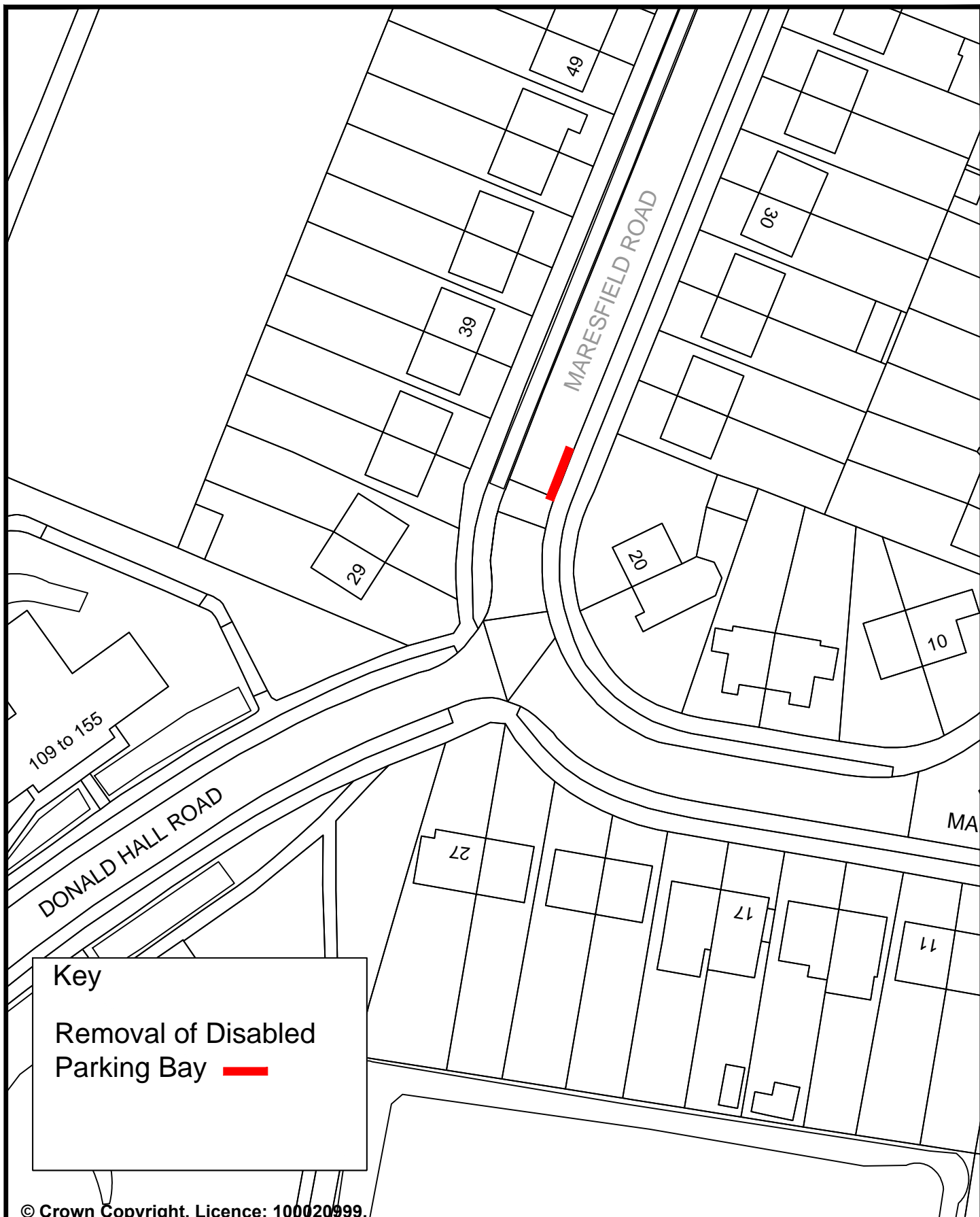


Brighton & Hove




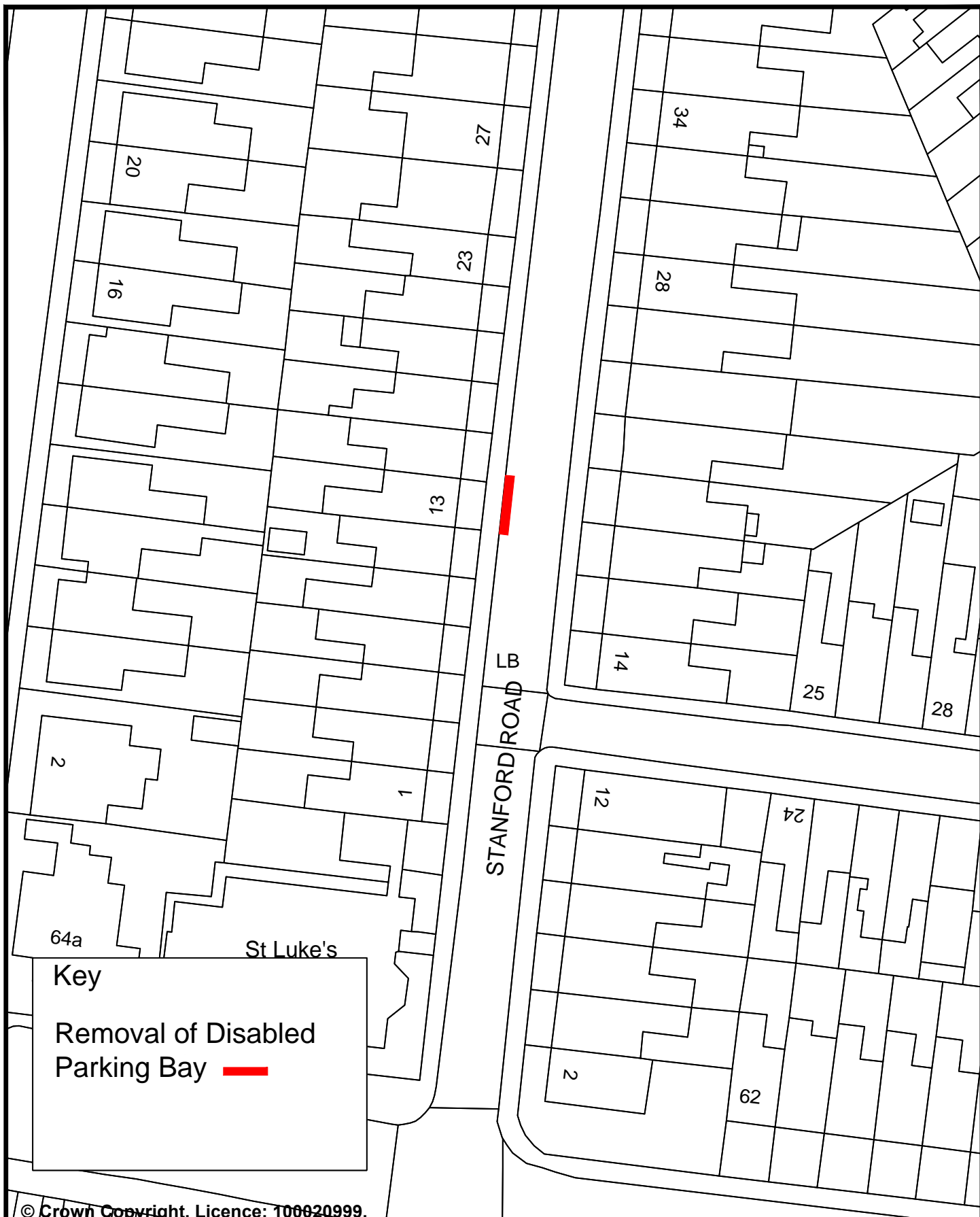
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TRANSPORT		PARKING INFRASTRUCTURE
Address: 3 Clifton Place, Brighton		
		Brighton & Hove
Reason: To provide a bay for a resident in the vicinity		Scale : N.T.S. Date : Sept 2017 Drawn : D.A. Drawing Number : B&H-DPB-CPZZ-001



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Brighton & Hove City Council, 2012.	TRANSPORT	PARKING INFRASTRUCTURE
Address: 20 Maresfield Road, Brighton	Scale : N.T.S.	 Brighton & Hove
	Date : Aug 2017	
Reason: Bay being removed as no longer required	Drawn : DLA	
	Drawing Number: B&H-DPB-CPZH-001	



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Brighton & Hove City Council, 2012.

Address: 13 Stanford Road,
Brighton

Reason: Bay being removed as no
longer required

TRANSPORT

PARKING INFRASTRUCTURE

Scale : N.T.S.

Date : Aug 2017


Drawn : DLA

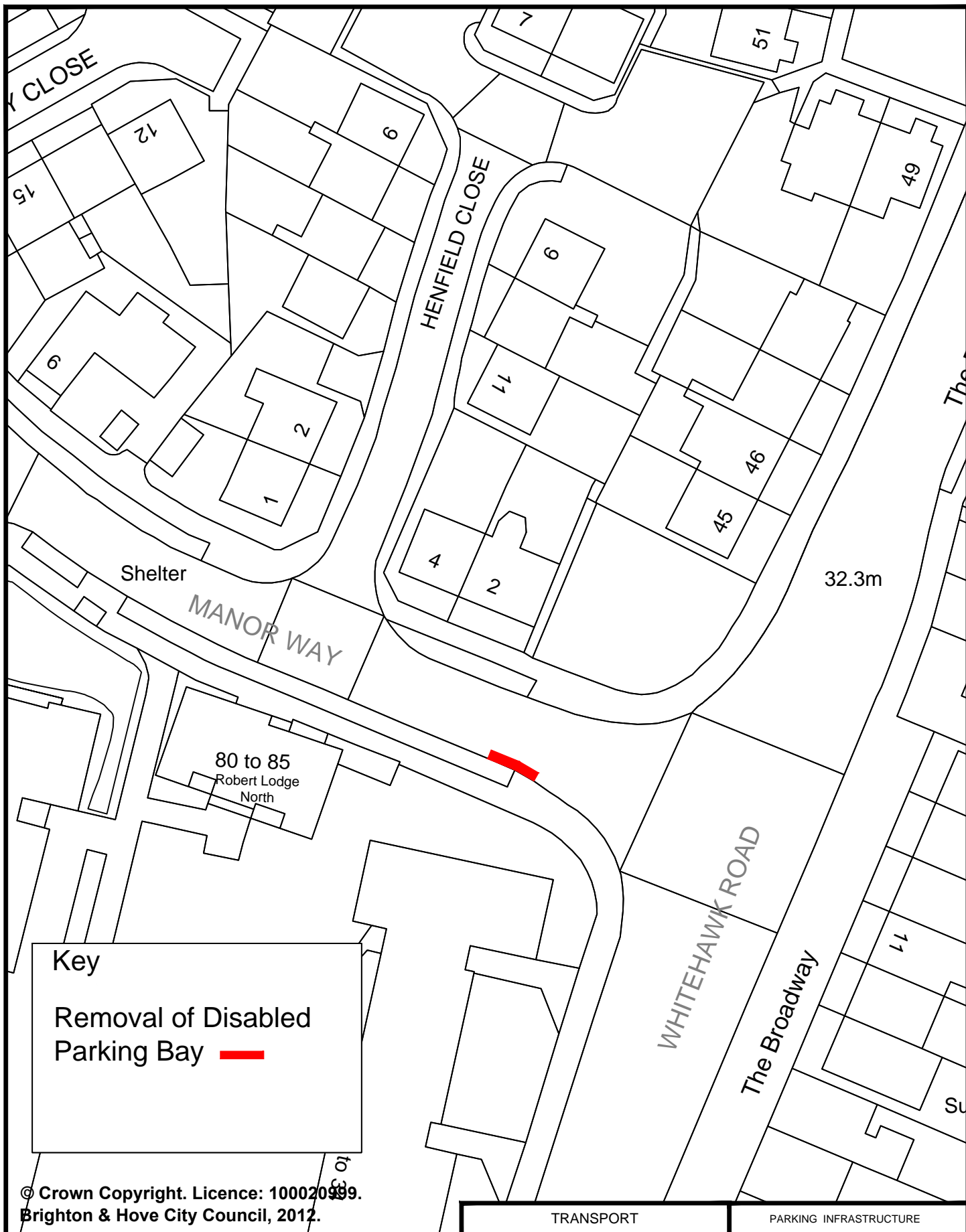
Drawing Number: B&H-DPB-CPZQ-001




Brighton & Hove



Address: 41 Sutherland Road, Brighton	Scale : N.T.S.	 Brighton & Hove
	Date : Aug 2017	
Reason: Bay being removed as no longer required	Drawn : DLA	
	Drawing Number : B&H-DPB-CPZU-001	



<p>Address: Opposite 2 Manor Way, Brighton</p>	<p>TRANSPORT</p> <p>Scale : N.T.S.</p> <p>Date : Aug 2017</p>	<p>PARKING INFRASTRUCTURE</p>  <p>Brighton & Hove</p>
<p>Reason: Bay being removed as no longer required</p>	<p>Drawn : DLA</p> <p>Drawing Number : B&H-DPB-EB-001</p>	

Subject:	School Parking Enforcement		
Date of Meeting:	20 March 2018		
Report of:	Executive Director, Economy, Environment & Culture		
Contact Officer:	Name:	Paul McCann Paul Nicholls	Tel: 01273 293014
	Email:	paul.mccann@brighton-hove.gov.uk	
	Ward(s) affected:	All	

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

- 1.1 Following a letter from Councillors to ETS Committee in October 2017 and subsequent agreement to bring back a report, officers have investigated and evaluated options on proposed changes to how school parking is enforced.

2. RECOMMENDATIONS:

- 2.1 That Committee agrees to increase by three the number of Civil Enforcement Officers (CEO) employed to cover school parking enforcement.
- 2.2 That Committee agrees that the 'Anti-social parking at schools – support and advice' webpage (www.brighton-hove.gov.uk/school-parking-advice) becomes the one point of contact point and guidance for schools, residents and councillors wishing to find out steps to take if there is a problem in their area.
- 2.3 That Committee agrees to the School Travel Team making schools aware that the one point of contact webpage is available for support and advice, on an annual basis to coincide with the beginning of the school year.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 There are currently two Civil Enforcement Officers who attend schools at opening and closing times to enforce the School Keep Clear road markings and deal with any parking issues. This allows an enforcement visit to one school in the morning and one in the afternoon. In the last academic year we received requests for enforcement visits from 45 different schools.
- 3.2 We also hold pre-arranged action weeks subject to resources, the most recent being in September 2017 in Patcham. An additional three staff would allow for at least twice as many action weeks to take place.
- 3.3 The School Travel Team comprises 3 officers working 2.4 full time equivalent posts.

- 3.4 The School Travel Team works closely with the Parking Enforcement Team when issues arise to offer resources to schools to assist them with their parking issues.
- 3.5 There are requests for more parking enforcement outside of the existing Controlled Parking Zones (CPZs) and calls to the parking enforcement line, where people can report parking problems. These requests have increased by 105% from February 2015 to December 2017. The Employment of three new officers and the purchase of two new scooters would also allow more enforcement to take place outside of the CPZs when the officers were not on school enforcement duties and help to achieve a quicker response to reported problems.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

CCTV / Automatic Number Plate Recognition (ANPR) car

- 4.1 Whilst a car fitted with CCTV and ANPR can assist with the school parking and general enforcement, the cost is high, even for an entry level CCTV /ANPR vehicle. Costs will escalate as additional staff are required not only to staff the vehicles but as back office support.
- 4.2 For the ANPR aspect of the car to operate, the Traffic Regulation Orders (TROs) would need to be mapped onto software which is a costly exercise. We are investigating the options for a Map Based TRO but this will take time to implement and the costs will need to be identified.
- 4.3 Covering those costs via income from penalty charge notices (PCN) is doubtful. We have consulted with other local authorities, including Southampton and Manchester, and had mixed reviews.
- 4.4 One local authority informed us that their experience of using a camera car has been frustrating due to technical issues and that the car did not reach its potential until the second year of use. Another local authority considered a camera car as a good investment, but they use the car for identifying untaxed vehicles and clamp identified vehicles so is heavily subsidised by a DVLA contract, however this type of enforcement is not carried out by Brighton & Hove City Council.

Installation of new static CCTV

- 4.5 The costs for installation of one new camera is £15,000 and would require the additional employment costs for officers to monitor the cameras and there can be additional setting up costs. There are, at the time of writing, 71 enforceable, School Keep Clear road markings in the city; therefore, by adding cameras to cover all these sites would in the region of £1,065,000. The cameras could not be utilised outside of school opening and closing times and during holidays and weekends.
- 4.6 We have looked into the use of using existing CCTV however there are only two schools visible and only one has School Keep Clear road markings, furthermore the camera is located too far away with insufficient zoom capabilities for us to obtain the required evidence.

Pavement / Verge parking bans by Public Spaces Protection Order (PSPOs)

- 4.7 We have consulted the London Borough of Havering who use PSPOs for school enforcement and they confirm that additional council staff are employed to carry out these duties. Where static CCTV is used to enforce a PSPO the borough had to install new cameras.
- 4.8 PSPOs are enforced by Fixed Penalty Notices (FPNs) rather than the civil penalty charge notices. Civil Enforcement Officers do not issue FPNs for traffic related offences and therefore additional staff are required for enforcement.
- 4.9 The use of PSPO or byelaws have not been recommended and, after consultation with Legal Services colleagues, it is advised that in the case of parking on the footway this could be prohibited by way of a Traffic Regulation Order (TRO).
- 4.10 The Council has existing TROs preventing parking on the footway and verges in the Surrenden and Mile Oak areas and on part of Carden Avenue.
- 4.11 Ultimately as a Council we are lobbying Central Government for powers to enforce pavement parking throughout the City which would resolve these issues.

Body-worn cameras

- 4.12 Body worn cameras cannot be used to enforce parking restrictions. They can only be used for the recording of anti-social behaviour towards the enforcement officer such as verbal or physical abuse.

Use of Electric bikes rather than motor scooters

- 4.13 We have considered using electric bicycles rather than motor scooters and, after successful use by NSL in the London borough of Kensington and Chelsea, have consulted with NSL.
- 4.14 NSL have stated that the bicycles are power assisted pedalling and we could not expect the same coverage that we currently get from an officer deployed on a motor scooter. The nature of enforcement by motor scooter, which is riding around large areas stopping usually, only to enforce one vehicle, could not be replicated by an electric bicycle. The city of Brighton and Hove is more spread out, and much hillier, than the borough of London where the use of electric bicycles is working relatively well.
- 4.15 In accordance with the current Key performance indicators on the parking enforcement contract, NSL are expected to attend to a parking problem, reported via the parking complaint telephone line, within one hour between the hours of 8am to 8pm. The increase in complaints from this has made this harder for NSL and it is felt that electric bicycles would not have the coverage to meet this.

5 CONCLUSION

- 5.1 It is felt that increasing by three the number of Civil Enforcement Officers (CEOs) will provide the best solution to improving school parking enforcement. The officers will also be able to assist both the parking complaint telephone line and provide additional patrols to the outer parts of the city which are outside of controlled parking zones.

6. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 6.1 The cost for employment of three civil enforcement officers and the purchase of two new scooters, based on the current contract pricing would be just under £83,400 per year.
- 6.2 It is estimated that by the end of year 3, the costs will be fully funded by income from Penalty Charge Notices (PCNs) issued by the new civil enforcement officers whilst carrying out other enforcement duties outside of school hours. In prior years, it is estimated that 80% of the costs will be met from PCN income and the shortfall will be included in the Targeted Budget Monitoring (TBM) forecasts for the revenue budgets of Parking Services.

Finance Officer Consulted: Gemma Jackson

Date: 05/02/18

Legal Implications:

- 6.3 Under the Traffic Management Act 2004 (the Act) in areas where civil enforcement powers are in force, civil enforcement officers may be employed directly by the enforcement authorities to enforce road traffic contraventions in that area. The council has operated civil parking enforcement since 2001. The Act places a network management duty on local traffic authorities to manage the road network with a view to securing, as far as is reasonably practicable, the expeditious, convenient and safe movement of all types of traffic. The council has the power to employ civil enforcement officers to help with the enforcement of school keep clear restrictions. Doing so will also demonstrate that the council is complying with its network management duty.

Please also see Appendix 1 Advice from Legal

Lawyer Consulted: Stephanie Stammers

Date: 31/01/2018

Equalities Implications:

- 6.4 This is an expansion of a current service and there are no foreseen equalities implications

Sustainability Implications:

- 6.5 We have investigated the use of electric bicycles for the purpose of providing additional enforcement, though it is not felt they can provide the same needed courage as motor scooters. We will ensure that the Motor Scooter purchased by NSL meet Euro 4 standard.

Crime & Disorder Implications:

- 6.6 Whilst most parking contraventions are decimalised and under the jurisdiction of the council, rather than the policed, the council works together with the police and holds action weeks to tackle anti-social driving and illegal parking. It is felt that having the additional enforcement officers more action weeks can be held and making the school areas safer will benefit the community.

Public Health Implications:

- 6.7 It is felt that the additional enforcement officers will provide the opportunity to reduce illegal parking around schools and promote road safety, via leaflets handed out by enforcement officer and through the work carried out by the school travel team.

SUPPORTING DOCUMENTATION

Appendices:

1. Advice from Legal
2. Options table
3. Letter from Cllrs Wares and Janio

Documents in Members' Rooms

None

Background Documents

None

Public Space Protection Orders (PSPOs)

PSPOs can be made under powers granted by the Anti-social Behaviour, Crime and Policing Act 2014 where 2 conditions are met-

1. Activities carried out in a public place have a detrimental effect on the quality of life of those in the locality, or it is likely that such activities will be carried out, and
2. The effect or likely effect of the activities is of a persistent or continuing nature, such as to make the activities unreasonable and justifies the restrictions imposed.

Consultation with the police and community representatives is required before a PSPO can be introduced. PSPOs can be resource intensive to introduce and enforce.

Guidance from the Local Government Association is that PSPOs should be used responsibly and proportionately to counter unreasonable and persistent behaviour that affects the quality of life of residents of an area. The guidance further states that other options should be actively considered before a PSPO is pursued as the issues may be addressed using other tools.

In the case of parking on the footway this could be prohibited by way of a traffic regulation order (TRO) under the Road Traffic Regulation Act 1984. A TRO may make any provision prohibiting, restricting or regulating the use of a road or any part of the width of a road, by vehicular traffic, or by vehicular traffic of any class specified in the order.

Byelaws

Byelaws are local laws made by a local council under an enabling power contained in a public general act or local act requiring something to be done or not done in a specified area. A byelaw cannot be made where alternative legislative measures exist that could be used to address problems.

Traffic issues are dealt with under the Road Traffic Regulation Act 1984. A byelaw is therefore inappropriate to prevent parking on the footway as this can be dealt with by a TRO made under the Road Traffic Regulation Act.

The Council has existing TROs preventing parking on the footway and verges in the Surrenden and Mile Oak areas and on part of Carden Avenue.

Body-worn CCTV

Under the Human Rights Act 1988 which binds public authorities a pressing need has to be demonstrated when surveillance is undertaken. The use of surveillance cameras must be necessary, proportionate and transparent. Body cameras must be used in a way that does not invade a person's privacy.

Clear rules, policies and procedure must be in place before a surveillance camera system is used. Security measures must also exist as a safeguard against unauthorised access and use. Under the data protection legislation the person being recorded must be told that they are being recorded,

who is processing their information and why. Data protection legislation also applies to the use, processing and storage of recordings.

At present the Council's Civil Enforcement Officers do not use body worn cameras. If the use of body worn cameras is to be introduced, policies and procedures must first be in place to ensure that their use by CEOs complies with the Data Protection Act, Protection of Freedoms Act, Human Rights Act and Regulation of Investigatory Powers Act.

Static traffic cameras/CCTV

The legislation relating to TROs allows a local authority to install structures on or near a highway for the detection of contraventions of the authority's TROs and to use the information provided by them to serve a Penalty Charge Notice (PCN) on the registered keeper of the vehicle that contravenes the TRO. The system may be used to survey any area of highway on which there are parking and traffic restrictions. The use of CCTV cameras must comply with the Data Protection Act, Protection of Freedoms Act, Human Rights Act and Regulation of Investigatory Powers Act.

An essential and integral part of any CCTV system operated by an authority is its Code of Practice which must set out the objectives of the system and the rules by which it will be operated. The Code of Practice ensures that issues such as privacy, integrity and fairness are properly dealt with. It sets a minimum standard which an authority choosing to enforce traffic regulation using CCTV cameras must comply with to ensure public confidence in the scheme.

At present the Council uses CCTV cameras to enforce the traffic restrictions in bus lanes and parking contraventions of double parking and parking in loading bays in some areas of the City. A code of practice for CCTV enforcement exists to ensure compliance with the relevant legislation and to set out the procedures for operation of the system.

Lawyer Consulted: Stephanie Stammers, Solicitor, Brighton & Hove City Council Date: 23/10/2017

<i>Method</i>	<i>Description</i>	<i>Advantages</i>	<i>Disadvantages</i>	<i>Cost</i>
Mobile CCTV / ANPR enforcement	Officers are deployed in a vehicle fitted with CCTV / ANPR equipment	<p>Effective enforcement of school keep clear markings</p> <p>Able to deploy to all schools</p> <p>Able to identify some offences for on foot officers to enforce</p> <p>Vehicle can be used to deploy officers to outer areas of the city that need enforcement</p> <p>Can be used all year and at all times for a variety of enforcements duties</p>	<p>CCTV /ANPR can have problems parking in order to carry out enforcement</p> <p>Technical issues have caused problems to vehicles used by other councils</p> <p>Cost is high and additional staff are required</p> <p>Mapping of current TROs is required this takes considerable time and has high costs</p>	<p>Purchase of ANPR car (Toyota Aygo) £54,432</p> <p>Software need would cost £3,640.00 plus Perpetual licence fee of £1,344 per annum</p> <p>Then £134.40per annum for each of the enforcement officer s</p> <p>Additional costs</p> <ul style="list-style-type: none"> • Training • Project management • Mapping and CPZ set up. • Additional staff <p>The staff will be required to operate the vehicle, as back office support, loading PCN's, directing enforcement.</p>

Static CCTV enforcement	Officers deployed in the councils traffic control centre monitoring cameras located within the city	Effective enforcement of school keep clear markings Traffic /parking problems would not defer enforcement as with CCTV / ANPR car	Currently there are few schools keep clears covered by CCTV To have effective cover of school keep clear cameras would need to be installed Cameras only used for one purpose and are static (they can only enforce the areas within their field of view	The costs for installation of one new camera is £15,000 and would require the additional employment of officers to monitor the cameras and there can be additional setting up costs. There are, at the time of writing, 71 enforceable, school keep clears in the city, by adding cameras to cover all these cost would be £1,065,000.
Additional three CEOs deployed by scooter	Officers are deployed by scooter	Effective enforcement of school keep clear markings Able to deploy to all schools Able to enforce all on street contraventions Able to be deployed to other duties after school visit Can be used throughout the city Full use can be made out of term time Quick access to outer areas of the city outside of CPZ		The cost for employment of three civil enforcement officers and the purchase of two new scooters, based on the current contract pricing that would be £83,336.88

Geoff Raw – Chief Executive
Brighton & Hove City Council

26th September 2017

Dear Geoff

We are submitting the following letter under Council Procedure Rule 23.3 to be included on the agenda for the Environment, Transport & Sustainability Committee meeting of 10th October 2017.

We have been contacted by residents, over many years, about illegal and anti-social parking outside schools in our respective Wards of Patcham and Hangleton & Knoll.

On many occasions we have used a variety of measures to address this issue, and we praise officers, the schools, the Council's parking enforcement contractor, NSL, and the Police for their work improving child safety. We are now looking to ensure that all schools throughout the City can utilise existing powers, which are seldom used effectively at present as they are not widely known.

There is not a single document that brings all of the elements together, providing a guide for stakeholders, on how to go about the process; even though the council does have information on its website.

In discussions with council officers, it has also been highlighted that no single point of contact exists to help facilitate a multi-agency campaign.

To that end, we respectfully ask that The Executive Director of Economy, Environment and Culture be requested to produce a report for E. T.& S. Committee to consider the following:

1. A summary to assist Schools, Councillors and officers that identifies what is available to deliver a multi-agency campaign such as, but not limited to, banners, leaflets (for enforcement officers), school take home packs, routes to schools, "park & stride" type initiatives, and enforcement (civil and criminal). The summary should include who to contact, what the process is for each element and what actions rely on another to be able to progress (perhaps a Gantt chart). It should also include advice on what parking restrictions exist, or could be imposed, and the benefits of them.
2. Advice on the creation of a single point of contact within the Council; someone who can manage and bring together all the component parts, including liaison with the Police, parking enforcement and schools.

3. Guidance on how Public Space Protection Orders could be used to prevent on-pavement parking, between certain times on school days; and if there are no such applicable uses of a PSPO, the report should explore ways of using local by-laws to achieve this goal.

In addition to provisions already available, could the report explore potential uses of body-worn c.c.t.v. – with a view to not only protecting staff from abuse, but to also provide evidence for enforcement and aid in prosecution. Similarly static traffic cameras outside schools will also act as a significant deterrent, whilst issuing instant fines for offences.

Yours sincerely

Cllrs. Tony Janio and Lee Wares

Subject:		Central Hove and Portslade Property Level Scheme – Permission to Procure	
Date of Meeting:		20 March 2018	
Report of:		Executive Director, Economy, Environment & Culture	
Contact Officer:	Name:	Maggie Moran	Tel: 01273 292239
	Email:	Maggie.moran@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 seek approval from the Committee to procure contractors to install Property Level Protection (PLP) measures to reduce flood risk to 63 properties in Central Hove and Portslade.
- 1.2 The cost of the scheme is £430,000. An allocation of £253,000 is to be provided by the Southern Regional Flood and Coastal Committee (SRFCC) Local Levy, pending approval from the Environment Agency. The remaining £177,000 will be funded by the City Council's Flood Protection Surface Water Management Grant.

2. RECOMMENDATIONS:

That the Environment, Transport & Sustainability Committee:

- 2.1 Approve procurement of contractors to install the flood resilience measures for Central Hove and Portslade.
- 2.2 Grants delegated authority to the Executive Director for Economy, Environment & Culture to carry out the procurement and award of the contract referred to in 2.1 above.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 In December 2010, the Environment Agency issued the national Indicative Flood Risk Areas to all Lead Local Flood Authorities. This work identified 10 Flood Risk Areas in England which had greater than 30,000 people at risk and the City of Brighton and Hove was ranked at 8th in this list, with 36,412 people identified to be at potential risk of flooding. As a result, BHCC were duty bound to prepare a Preliminary Flood Risk Assessment (PFRA) to facilitate the identification of Flood Risk Areas and local Flood Risk Management options.
- 3.2 The BHCC Surface Water Management Plan (SWMP), completed by Peter Brett Associates in 2014 drew on the findings of the PFRA and identified a number of key flood hotspots throughout the City, being predominantly those that suffered

extensive flooding during the winter of 2000/2001. This flooding was reported to have been as a result of an extreme rainfall event which overwhelmed the surface water drainage system. Two of the hotspot areas identified were located within the vicinity of Hove and Portslade, which has suffered from repeated incidents of surface water flooding.

- 3.3 Since publication of the SWMP, further flooding has occurred in Brighton and Hove, in July 2014 and August 2015. [This][Both events] resulted in significant surface water flooding affecting over 100 properties. The SRFCC has allocated funds to provide a PLP Scheme to help mitigate the effects of flooding, which is in line with objectives 5 and 7 of the Local Flood Risk Management Strategy (LFRMS). These seek to:

- “Raise public awareness and resilience to flooding” (Objective 5); and
- “Work with partners and funders to implement sustainable public health protection measures” (Objective 7).

Objective 7 goes on to state that where engineered solutions are considered financially unviable, then “it may be necessary to establish other measures to protect the public, including educational and advisory information, support and/or property level protection”.

- 3.4 The Southern Regional Flood and Coastal Committee (SRFCC) Local Levy has allocated grant money for the Central Hove and Portslade PLP Scheme for the financial year 2017/2018. BHCC has submitted an Outline Business Case for approval by the Environment Agency in order to drawdown the funding. The project has now received both technical and financial approval from the Environment Agency including funding of £253k for this scheme.



- 3.5 The primary objective of this scheme is to address flood risk from surface water flooding which has affected properties throughout Hove and Portslade for a number of years. Since there are no technically viable engineering options for mitigation available, these properties remain vulnerable to surface water flooding.

- 3.6 At present BHCC’s response to such flooding has been to deploy sandbags, but BHCC has limited operatives and resources to deal with incidents. There is no specific deployment plan for sandbags due to the unpredictability of extreme rainfall events. Sandbags are usually deployed after the incident has occurred and after damage has been done. Generally, sandbags have been found to be largely ineffective when dealing with issues of quick onset flooding, resulting in additional costs to BHCC in relation to post-flood clean-up and removal of sandbags to landfill. As such, the deployment of sandbags is also considered to be an unsustainable and largely ineffective option.

- 3.7 Property level protection measures have therefore been investigated, to afford some protection from the frequently repeated flooding events and as an alternative to the only other option of sandbag deployment.

- 3.8 BHCC as the Lead Local Flood Authority requires the services of an experienced flood contractor who has experience in providing and installing property level protection measures for the reduction of flood risk specifically from surface water and in certain areas groundwater. The measures to be provided, recommended and required are passive flood mitigation measures. This means that they will

act automatically in a surface water flood event. Measures can include a flood door, flood gate or an automatic airbrick cover, see pictures below for examples.

		
Flood Door	Flood Gate	Automatic Airbrick

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 No alternative options are currently available

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Public consultation drop-in events were held in February 2017 at Hove Library and individual property surveys have been completed at the 64 properties identified as being at potential risk of flooding.
- 5.2 The surveys assessed the flood risk posed to the properties, as well as identifying ingress routes in to the buildings and recommending a range of flood protection options and measures to help mitigate against internal flooding. In total 63 properties were found to be eligible for [further?] inclusion in the scheme.

6. CONCLUSION

- 6.1 The procurement and award of this sole supplier contract will assist the Council in complying with its duties as a Lead Local Flood Authority and fulfil the objectives of the Local Flood Risk Management Strategy and the Central Hove and Portslade Property Level Protection Scheme.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The cost of implementing the report recommendation is estimated to be £430,000.
- 7.2 Grant funding of £253,000 has been requested from the Environment Agency's Southern Regional Flood and Coastal Committee Local Levy. This income will not be received by the council if the procurement of contractors to install the flood resilience measures is not approved.

- 7.3 The remaining estimated cost of £177,000 will be funded from the Surface Water Management reserve held by the Transport department.
- 7.4 The procurement of a contractor is subject to the council's Contract Standing Orders policy.

Finance Officer Consulted: Gemma Jackson

Date: 07/02/18

Legal Implications:

- 7.5 The procurement in relation to the provisions and installation of property level flood defences will be undertaken in accordance with the Council's Contract Standing Orders and EU Procurement Regulations. The value of the proposed contract is below the "works" threshold in the Public Contracts Regulations 2015, but the general principles of the Regulations (such as transparency and equality of treatment) will continue to apply.

Lawyer Consulted: David Fairfield

Date: 23/02/18

Equalities Implications:

- 7.6 None specific to this report

Sustainability Implications:

- 7.7 None specific to this report

Any Other Significant Implications:

- 7.8 As per Section 7.1

SUPPORTING DOCUMENTATION

Appendices:

1. Outline Business Case

Documents in Members' Rooms

1. None

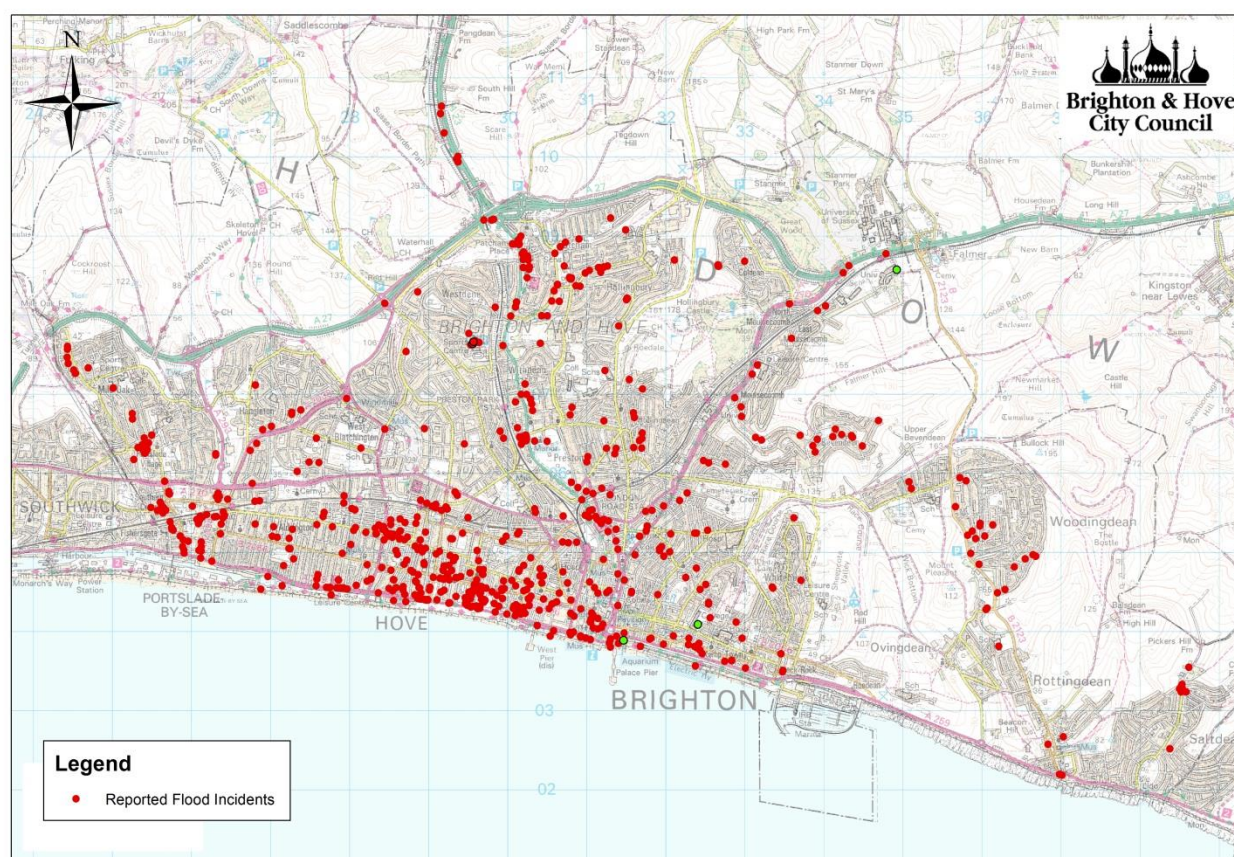
Background Documents

1. None

Short Form Business Case guidance
for a FCERM change project for Local
Authorities, Internal Drainage Boards
and other risk management
authorities

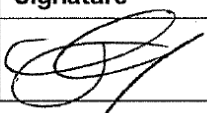


Brighton and Hove PLP Scheme RMA Short Form Brighton and Hove PLP Scheme Business Case



Version No: 1.0
Date: 20/11/2017

BUSINESS CASE APPROVAL SHEET

1 Review & Technical Approval				
Project title	Brighton and Hove PLP Scheme			
Authority project reference		EA reference		
Lead authority	Brighton and Hove City Council	Date of submission	30/11/2017	
Consultant	JBA Consulting			
'I confirm that this project meets our quality assurance requirements, environmental obligations and Defra investment appraisal conditions, that all internal approvals, including member approval, have been completed and recommend we apply to the RFCC for local levy in the sum of £ 253,000.				
Job title	Name	Signature	Date	
Authority Project Executive	Yann Vochelle		30/11/17	
'I have reviewed this document and confirm that it meets the current business case guidelines for local authority and Internal Drainage Board applications.'				
OBC reviewer	Rebecca George			
'I confirm that the project is ready for assurance and that I have consulted with the Director of Business Finance'				
Area Flood & Coastal Risk Manager	Gordon Wilson			
Assurance sign off - (Tick the appropriate box)				
AFCRM Assurance <input type="checkbox"/> Projects < £100k Or Projects < £1m (if GiA & Levy <£100k)		NPAS Assurance <input checked="" type="checkbox"/> Projects £100k - £2m		
Recommendation for approval			Date	
AFCRM or NPAS Chair				
Project total as approved (£k)		Version Number		
Project total made up of:	Capital Grant (£k)			
	Levy (£k)	253		
	Other Contributions (£k)	230		
2 Project Financial approval				
Financial scheme of approval	Project total	Name	Signature	Date
Area Flood & Coastal Risk Manager	<£100k or <£1m (if GiA & Levy <£100k)	Gordon Wilson		
Director of Business Finance	All projects >£100k			
Plus:				
Area Manager	£100k- £1m			
Director of Operations	£1m -£10m			
3 Further approvals (if applicable)				
Date sent (or N/A)		Version number (if different)		
Date approved (or N/A)				
Final Comments				

For FSoD Coordinator use only:	

Table of Contents

BUSINESS CASE	9
1. INTRODUCTION	9
2. STRATEGIC CASE	9
3. ECONOMIC CASE	11
4. COMMERCIAL CASE	13
5. FINANCIAL CASE	14
6. MANAGEMENT CASE	14
7. RECOMMENDATION	17

Business Case

1. Introduction

Hove and Portslade are coastal suburbs of the city of Brighton and Hove. The suburbs are bounded by Brighton to the east, the South Downs to the north and the town of Shoreham to the west. There are no main rivers or ordinary watercourses within Brighton and Hove.

Following extreme rainfall events in both July 2014 and August 2015, these areas experienced significant surface water flooding. Due to the rainfall intensity, local sewers and drains were unable to cope with flows which resulted in over 100 properties flooding. The areas most affected were in low-lying urban areas where opportunities for natural drainage are limited. As a result of these events, Brighton and Hove City Council (BHCC) have been allocated £253,000 of local levy money from the Southern Regional Flood and Coastal Committee (SRFCC), in conjunction with £230,000 of their own money, to provide a Property Level Protection (PLP) scheme. This scheme is to protect vulnerable properties in low lying areas where natural drainage is limited with passive Property Level Protection measures..

Additional surface water flood events reported throughout the area include:

- 1990s
- Winter 2000/2001
- February 2014
- July 2014
- October 2014
- June 2016
- July 2017

This business case will follow the Five Case Model and seeks approval for £253,000 of local levy money to better protect 63 properties from the risk of surface water flooding. It will set out the strategic case for change, identify the different options available and provide indicative costs and benefits sufficient to demonstrate that a viable project is possible and to identify the preferred option.

2. Strategic case

Strategic context

In December 2010, the Environment Agency issued the national Indicative Flood Risk Areas to all Lead Local Flood Authorities (LLFAs). This work identified 10 Flood Risk Areas in England which had greater than 30,000 people at risk and the City of Brighton and Hove was ranked at 8th in this list, with 36,412 people identified to be at potential risk of flooding. As a result, BHCC were duty bound to prepare a Preliminary Flood Risk Assessment (PFRA) to facilitate the identification of Flood Risk Areas and local Flood Risk Management options.

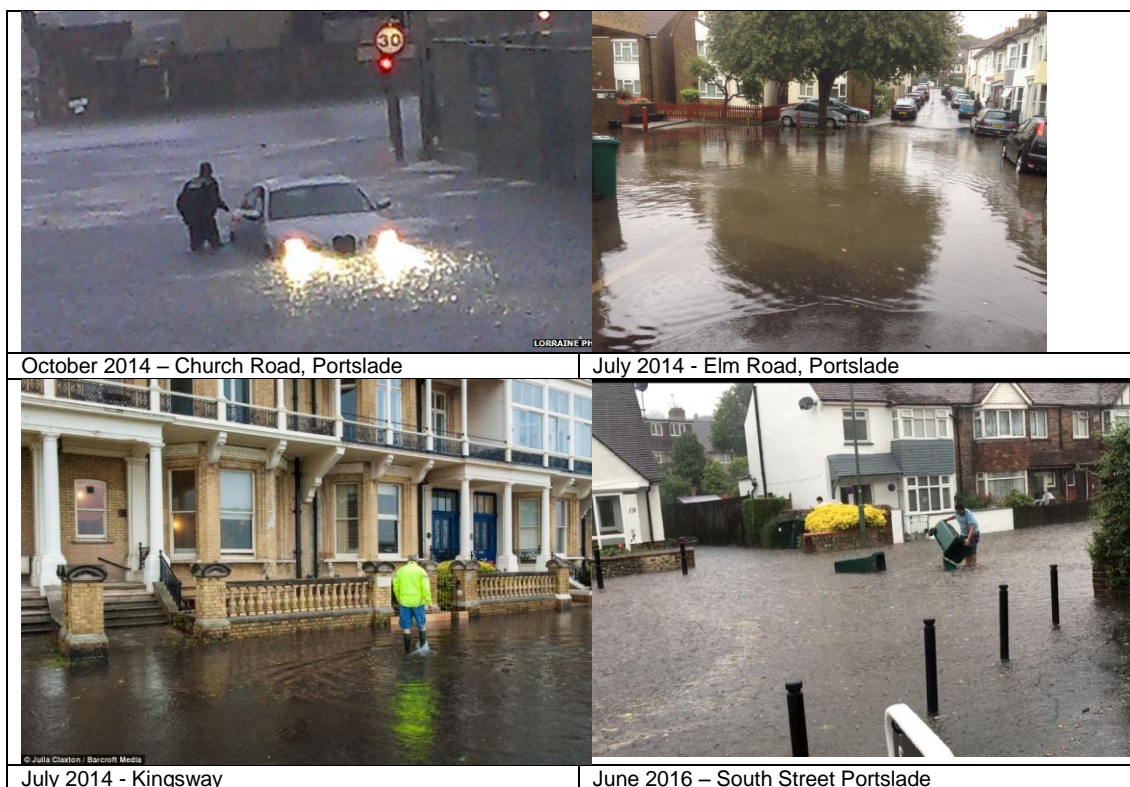
The BHCC Surface Water Management Plan (SWMP), completed by Peter Brett Associates in 2014 drew on the findings of the PFRA and identified a number of key hotspots throughout the City, predominantly following extensive flooding during the winter of 2000/2001. This flooding was reported to have been as a result of an extreme rainfall event which overwhelmed the surface water drainage system. Two of the hotspot areas identified were located within the vicinity of Hove and Portslade, which has suffered from repeated incidents of surface water flooding.

Since publication of the SWMP, more recent flooding has occurred once again throughout Brighton and Hove, in July 2014 and August 2015. This resulted in significant surface water flooding affecting over 100 properties. The SRFCC has allocated funds to provide a PLP Scheme to help mitigate the effects of flooding, which is in line with objectives 5 and 7 of the Local Flood Risk Management Strategy (LFRMS). These seek to:

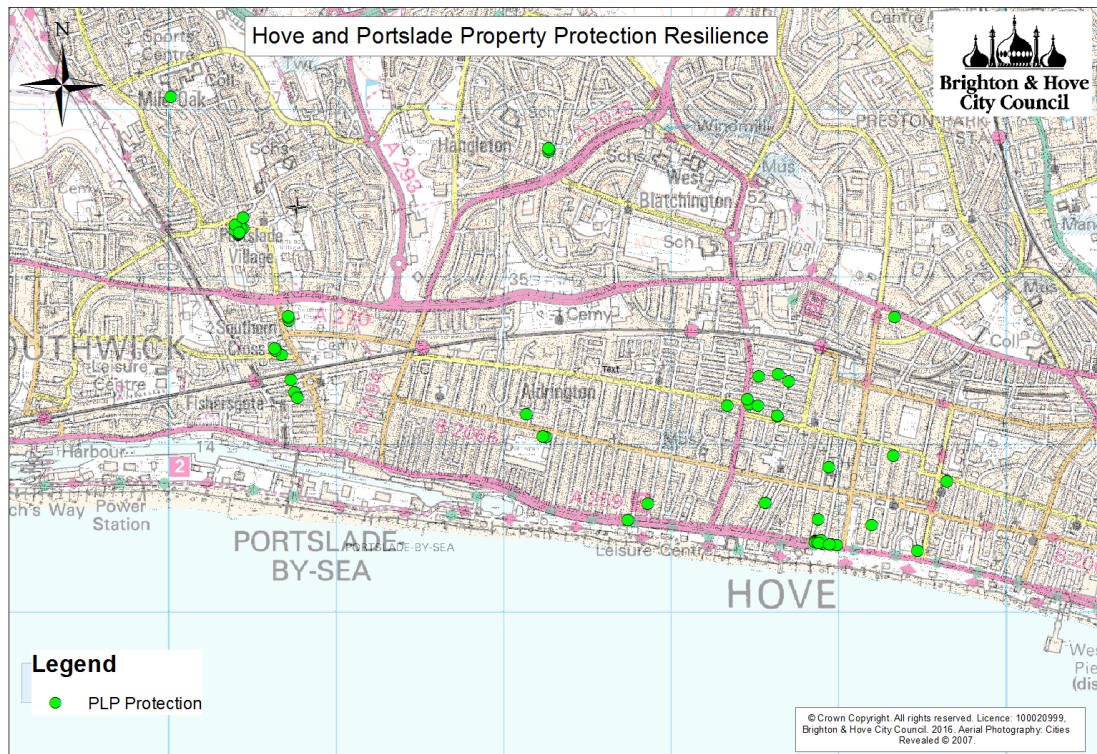
- “Raise public awareness and resilience to flooding” (Objective 5); and

- “Work with partners and funders to implement sustainable public health protection measures” (Objective 7). Objective 7 goes on to state that:
- “where engineered solutions are deemed unviable, it may be necessary to establish other measures to protect the public, including educational and advisory information, support and or PLP.”

The case for change



Areas of Hove and Portslade have suffered from repeated incidences of surface water flooding, reported to have been affecting properties since the 1990s. Following key surface water flood events, such as Winter 2000/2001, July 2014, October 2014, July 2015 and August 2015, widespread internal property flooding was reported to BHCC by residents. Given the dispersed nature of the flooded properties, the discrete surface water flow routes and the unpredictability of each event, alternative options for flood mitigation, such as the use of temporary or permanent defence structures are not viable options and have not been considered. The map below displays the properties to be included within the proposed property level protection scheme.



Following the July 2014 and August 2015 flood events, BHCC was allocated funds through the SR FCC to initiate a PLP scheme for properties at risk of surface water flooding. Introduction letters were sent to 151 properties which had either reported an incidence of internal flooding, or were adjoining a property that had, inviting them to take part in the scheme through participation in an initial PLP survey. In total, 64 property owners took up the offer and each property was assessed with regard to their potential flood risk, with recommendations for flood mitigation options identified. It was found that 16 of the properties which took part in the initial survey had not flooded internally, however all but one of these were adjoining properties which had suffered from flooding and as such, these properties have also been considered as eligible for further inclusion in the scheme.

Objectives

The primary objective of this OBC is to address flood risk from surface water flooding which has affected properties throughout Hove and Portslade for a number of years. Since there are no technically viable engineering options for mitigation available, these properties remain vulnerable to surface water flooding. Passive property level protection measures have therefore been investigated, to afford some protection from the frequent repeated flooding events and as an alternative to the only other option of sandbag deployment by BHCC.

Such a proposal will help address both LFRMS objectives to raise flood awareness and provide PLP measures.

3. Economic case

Options considered

As identified above in the 'Case for Change', the dispersed and frequently isolated nature of the surface water flooding reported throughout Hove and Portslade means that alternative options, such as traditional engineered schemes or the use of temporary and permanent flood barriers have not been deemed suitable. The installation of PLP measures is the only option that has been considered by BHCC to help mitigate the issue of surface water flood risk within the area of Hove and Portslade.

Options		Description	Technical, Environmental & Social matters
1	Do nothing	<i>No measures offered to the properties. No sandbags are provided.</i>	The residents will continue to suffer from the adverse effects of flooding.
2	Do minimum	<i>Provide support to residents when flooded. Although not BHCC policy, provide sandbags if available on a case by case basis.</i>	The residents will continue to suffer from the adverse effects of flooding.
3	PLP	<i>Installation of passive Property-level Protection at each property.</i>	Universal agreement required from all attached properties to ensure PLP is at its most effective. Residents (many are tenants) required to install measures themselves - passive options are necessary and provide the most benefit.

Key findings

Public consultation drop-in events and Individual property surveys have been completed at the 64 properties identified as being at potential risk of flooding. The surveys assessed the flood risk posed to the properties, as well as identifying ingress routes in to the buildings and recommending a range of flood protection options and measures to help mitigate against internal flooding. In total 63 properties were found to be eligible for further inclusion in the scheme and considered for PLP measures should funding be approved. One detached property was found to have no record of ever flooding so was excluded from further assessment.

Using recorded frequency of historic flood events and the Environment Agency's Risk of Flooding from Surface Water mapping, 24 properties were determined to be at very significant risk of flooding, with the further 39 at significant risk. The Weighted Annual Average Damage (WAAD) approach was used to calculate Present Value damages (PVd), as set out in the Multi Coloured Manual. The PVd were calculated to be £992k and were calculated over the lifetime of the scheme, which in the case of PFR products is 20 years, see the appendix for the Strategy Level Economic Calculator_v6 (Aug 17) v2.0. To calculate the present value benefits, it has been assumed that with the products in place, all damages would be countered and mitigated against. This is due to the shallow depths of flooding which have historically been reported at the properties included in the scheme.

As a result of the initial surveys, BHCC were supplied with an indicative cost estimate from JBA Consulting to provide measures to each property, which was in the region of £446k. The cost is representative of the passive measures required such as flood proof doors, automatic airbricks, non-return valves, inspections and sealing, as well as pumping solutions. The cost of measures was based on findings of the 2012 Defra report, 'Establishing the Cost Effectiveness of Property Flood Protection: FD2657' which gives confidence in the costs associated with the scheme and as such, a relatively low optimism bias of 10% has been included in the figure. Where the properties in question are basement flats, it has been appropriate to recommend a gateway barrier situated at street level which in some cases provides protection to more than one property.

Option		Present Value costs (£k)	Present Value damages (£k)	Present Value benefits (£k)	Average benefit: cost ratio (BCR)	Option for incremental calculation
1	Do nothing	£0	£992	£0	N/A	N/A
2	Do minimum	£1.5 (day) £2.1 (Night)	£992	£0	N/A	N/A
3	PLP	£483	0	£992	1.96	N/A

Preferred way forward

By adopting the 'Do nothing' approach, the properties located within Hove and Portslade will remain at risk of internal flooding during future surface water events and has therefore been discounted. The 'Do minimum' option, whereby sandbags would be deployed in an emergency is very costly and is labour intensive. The costs described in the table above are based on operatives working for 7 hours, both the day and night rate have been shown to demonstrate the different costs. BHCC have limited operatives and resources to deal with incidents. There is no specific deployment plan for sandbags due to the unpredictability of extreme rainfall events. Sandbags are usually deployed after the incident has occurred and damage has been done. Generally, sandbags have been found to be largely ineffective when dealing with issues of quick onset flooding, with additional costs to BHCC regarding post flood clean-up and removal of sandbags to landfill. As such, the deployment of sandbags is also considered to be an unsustainable and largely ineffective option.

Based on analysis of the project so far and the feelings of the residents captured during the drop-in events and property surveys, the provision of PLP measures is the preferred way forward for the Hove and Portslade properties. Where appropriate it is recommended that PLP products installed are KiteMarked, achieving the relevant British standard. This will help to ensure that, as long as they are well installed, maintained and in a good condition, the products will perform to the best standard possible. The installation of PLP results in a positive cost benefit ratio of 1.96. The main intangible benefit however, is that the residents will have an increased peace of mind and the emotional strain associated with repeated flooding and the threat of flooding will be reduced. It has been assumed that all damages would be mitigated against through the application of PLP measures.

4. Commercial case

Procurement strategy

Sixty-four independent flood risk assessment reports have already been obtained for the properties deemed to be at risk which outline the recommended PLP mitigation measures per property. An installation company will need to be appointed who will follow the recommendations outlined in the property reports and determine the precise design and specific products on a site by site basis in conjunction with the homeowners and council. BHCC will appoint the installation company through open competitive tender to ensure the best value.

Key contractual terms and risk allocation

The project will be managed by BHCC under an industry standard contract and is likely to be a short form contract due to the low value of the project. The overall financial risk to the project will be taken by the City Council and partners will not be expected to contribute if the project is over budget.

Construction is relatively low risk and specialist and experienced contractor will be employed by BHCC to undertake the work, which will reduce the risk of construction related issues. Construction works will be monitored and checked by BHCC. Following construction, an independent post installation survey will be completed by JBA to ensure that all measures have been provided and residents are aware of installation, maintenance and storage procedures.

Efficiencies and commercial arrangements

The project will be let as one lot and all of the properties will be worked on in one lot therefore being constructed in the most efficient manner.

5. Financial case

Summary of financial appraisal

	Cost for economic appraisal (PV)	Whole-life cash cost	Total Project cost (approval)
Costs up to OBC	£53,000 – sunk cost	£53,000 – sunk cost	£53,000 – sunk cost
<u>Costs after OBC</u>			
Consultants' fees	£7,560	£7,560	£7,560
Contractors' fees and construction	£380,196.00	£380,196.00	£380,196.00
<u>Risk Contingency</u>			
Optimism Bias – 10%	£42,244	£42,244	£42,244
Inflation	N/a	N/a	
Future costs (construction + maintenance)	(PV)	(Cash)	
	0	0	N/a
Project total cost	£483,000	£483,000	£483,000 (includes the £230k BHCC contribution, sunk costs and 10% Optimism bias)

Funding sources

This scheme will be funded through two different sources - the Southern Regional Flood and Coastal Committee have agreed an allocation of £253,000 of local levy and Brighton and Hove City Council have committed £230,000 towards the project. The profiled spend of the different funding sources is summarised in the table below.

Annualised spend profile (£k)	Yr 0 2017/18	Yr 1 2018/19	Total
Local Levy confirmed allocation	£83,000	£170,000	£253,000
BHCC contribution (committed and agreed)	£53,000	£177,000	£230,000
Project total cost	£136,000	£347,000	£483,000

6. Management case

Project management

Brighton and Hove City Council as the Lead Local Flood Authority is managing this project. The Project Manager will be Maggie Moran (Flood Risk Manager) and the Project Executive will be Yann Vochelle (Senior Project Engineer)

Activity	Date (DD/MM/YYYY)	Comment
Planning permission received	TBC	10 Properties require planning permission, applications to be submitted due to listed building status
Work to be started on site	15 March	BHCC will have appointed the PLP

Activity	Date (DD/MM/YYYY)	Comment
	2018	contractors and will be ready to begin installation
Work substantially completed by	August 2018	Including post installation audits

Benefits realisation

Contributions to outcome measures	
Outcome 1 – Ratio of whole-life benefits to costs	
Present value benefits (£k)	992
Present value costs (£k)	483
Benefit: cost ratio	2.05
Outcome 2 – Households at reduced risk	
2a – Households moved to a lower risk category (number – nr)	63
2b – Households moved from very significant or significant risk to moderate or low risk (nr)	63
2c – Proportion of households in 2b that are in the 20% most deprived areas (nr)	0
Outcome 3 – Households with reduced risk of erosion	
3a – Households with reduced risk of erosion (nr)	
3b – Proportion of those in 3 protected from loss within 20 years (nr)	
3c – Proportion of households in 3b that are in the 20% most deprived areas (nr)	
Outcome 4 – Water framework directive	
4a – Hectares of water-dependent habitat created or improved (ha)	
4b – Hectares of intertidal habitat created (ha)	
4c – Kilometres of river protected (km)	

Risk management

	Key Risks	H/M/L	Owner	Mitigation
1	Planning permission for Property Flood Resilience not achievable on listed properties.	Medium	BHCC	Early liaison with the Local Planning Authority and Conservation Officer and adopt comments in the design.
2	Property Flood Resilience solution not implemented correctly / not fully effective.	Low	BHCC	Engage with and encourage residents at an early stage to use BSI Kite Marked products to be installed by Kite Mark approved contractors.
3	Property owner refusal to adopt PFR measures and refusal to access contribution funds.	Low	BHCC	Early liaison with property owners and the utilisation of engagement events such as flood fairs.

	Key Risks	H/M/L	Owner	Mitigation
4	Groundwater flooding	Low	BHCC	Realistic expectations set with the property owners of PLP interventions.
5	Funding- the Property Flood Resilience scheme does not receive £253k Local Levy funding.	Low	BHCC	Business case developed in accordance with the EA's FCERM-AG, and presented in an appropriate format (i.e. OBC). The project's economic case has a robust benefit cost ratio >1 showing the project is viable.
6	Residents change their mind about the recommended measures after having discussions with the installer.	Medium	BHCC	Early liaison with property owners and the utilisation of engagement events. Signed legal agreements, detailing specific products to be ordered confirms buy-in before products are ordered.
7	Legal agreements between residents and freeholders take time to implement (specifically for shared mitigation measures such as flood gates for shared entrances).	Medium	BHCC	Early liaison with property owners and residents.
8	Surface water flood risk can in some cases only affect part of the property and mitigation measures have been recommended accordingly.	Medium	BHCC	In all of these cases, partial property level protection has been confirmed with the resident on site. For example, if only the front of the property is at surface water flood risk i.e. for a terraced property where the surface water flood risk is from the road at the front of the property, measures have only been recommended for the front of the property.

Assurance, approval & post project evaluation

Internal Reviews:

Project documents and project stages will be managed proportionately using the produce, review and approve' process. Once a document has been produced, it will be peer reviewed, completed and then submitted for approval to a competent officer.

Internal Assurance:

As part of the Project Assurance an independent cost consultant and/or quantity surveyor may be employed. This role will scrutinise and control contractor, sub-contractor and third-party estimates/costs.

External Assurance:

This OBC will be assured by the Environment Agency's National Project Assurance Service.

Post Project Evaluation

BHCC will complete a post PLP installation survey to ensure that all measures are installed correctly and the residents are confident in their use. Following scheme completion, BHCC will present to the RFCC on their findings from the scheme and share any lessons learnt.

7. Recommendation

It is recommended that PLP measures are taken forward as the preferred option for the 63 Hove and Portslade properties which are at current risk of surface water flooding and have already received a PLP survey. BHCC has secured £253,000 through Local Levy funding and a further £230,000 through their own funds, which fully covers the cost of recommended PLP measures at each property, including a 10% optimism bias. Consultancy fees will be allocated from funding secured directly from BHCC, with the entire amount of Local Levy funding allocated to the provision of measures.

This funding will cover the cost of a basic package of PLP measures, with aesthetic upgrades requiring a contribution from property owners directly.

Strategy Level Economic Calculator

	Mandatory input by user
	Optional input by user
	Calculated by spreadsheet

Project name	Brighton and Hove PLP Scheme
Project reference	2016s5204
Project location	Brighton and Hove

Test discount rate	3.5%	3.0%	2.5%
Appraisal period (years)	20		
PV factor for appraisal period	14.710		

3.1	Define the benefit area		
	Residential properties at risk for 200 year event (nr)	63	
	Average property value (£)	354,847	
	Flood warning? (None/<8 hour/>8 hour)	None	0

Properties at risk	Properties protected (default)	Properties protected (default)	AAD per property	Total AAD
nr	%	nr	£	£
0	n/a	0	£ 5,054	£ -
0	n/a	0	£ 5,054	£ -
0	5%	3.15	£ 3,071	£ -
24	10%	3.15	£ 1,580	£ 37,928
39	25%	9.45	£ 757	£ 29,514
0	80%	34.65	£ 323	£ -
0	93%	8.19	£ 80	£ -
0	100%	4.41	£ 41	£ -
63		63		£ 67,442
				£ 992,079
				£ 22,355,361
				£ 992,079

[illegible]

	Property Count	Percentage Properties	Percentage Damage		
	63	100.0%	100.0%	£	992,079
	0	0.0%	0.0%	£	-
Total	63	100%	100%	£	992,079
				£	992,079

