

Brighton & Hove City Council

Environment, Transport & Sustainability Committee

Agenda Item 17(c)

Subject: Deputations

Date of meeting: 20 September 2022

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.

Notification of a further four Deputations has been received. The spokesperson is entitled to speak for 5 minutes.

2) Deputation: Reigate Road speeding

Local residents of Reigate Road have been in discussions with the council for many years about the danger caused by traffic speeding up and down Reigate Road and the surrounding area. Volunteer groups have previously performed speed tracking surveys which recorded speeding and there have been multiple car accidents on Reigate road and at the junction of Wincombe road already. It is the opinion of many on Reigate Road and the surrounding area that the current road arrangements in our community will eventually lead to a serious, if not fatal, accident. Groups of residents have therefore campaigned for action by the council for some time.

It is considered that the main cause of speeding is traffic using Reigate Road and the surrounding area as a "rat run" to and from the centre of town, to bypass traffic lights on the main roads in and out of the city.

An open meeting was held on 9th August 2022 which was attended by local ward councillors in which residents and councillors discussed the "rat run" issues.

At the meeting, the main traffic safety issues identified by residents at the meeting on 9th August were:

- Traffic cutting down The Drove, along Reigate Road and out onto Millers Road to avoid the Dyke lights
- Traffic coming up from the city centre, off Highcroft Villas, along Reigate Road and turning left, out along Wincombe Road, to avoid traffic lights on the main routes out of town (Preston Road and Dyke Road)

A further open consultation meeting on 8th September 2022 was attended by 56 residents of Reigate Road and the surrounding roads. It was agreed at that meeting that there is a problem with traffic safety in our community and that a deputation to the council should be made to ask the council to address the issue effectively.

This deputation is therefore a request to the council to allocate resources to assess effective solutions to improve traffic safety on Reigate Road and the surrounding area. We would ask that the council make a full assessment of the wider impact of any proposed measures on residents of nearby roads, including (but not exclusively) The Drove, Wincombe Road, Compton Road, Inwood Crescent, and

Hampstead Road, and allow for a full consultation of those who could be affected, as part of the process.

Supported by:

John Gripton

Els De Boer

Elizabeth Camochan

Anna de Janon

Louise Sigfrid

Katy Langhorn

3) Deputation: Adoption of New TRO Amendment Mechanism in Support of Car-Free Development

Due to a change in National Planning Guidance, the Council stopped using planning legislation as a mechanism via which to place car-free conditions on new developments in January 2021. More than twenty months later we are still waiting for an announcement about how the new mechanism – amendments to Traffic Regulation Orders operating in CPZs – will work in practice. In the meantime, it appears the council has no mechanism through which to uphold its own car-free development policy.

A number of Round Hill residents would like the ETS Committee to urge officers to speed up the adoption of this new mechanism. The new mechanism also needs sufficient administrative support and resources to ensure there is no adverse impact on public consultation when this relocated from the Planning Register to TRO website run by Parking Design & Implementation.

In June of this year, residents of the car-free development on Crescent Road in Round Hill were successful in their planning application to have the car-free condition for the site lifted. The Local Planning Authority received legal advice that due to the change in National Planning Guidance there was no basis to refuse the application. Due to an administrative error by the Local Planning Authority, there was no TRO amendment in place restricting access to residents' parking permits. This four-house development was initially refused planning permission but was approved in 2018 on condition it remain car-free – a decision that was upheld by the Planning Inspector in 2019. The occupants, however, have always had access to residents' parking permits. In their 2019 report, the Planning Inspector categorised Crescent Road and the surrounding roads as an area of "high parking stress".

In the wake of the planning decision on the Crescent Road development earlier this year, in August a developer for another car-free development on Prince's Road in Round Hill -- six two-bedroom houses – was successful in their application to have the car-free condition lifted. Again, the initial planning application for this development was refused but later approved on condition it remain car-free. Unlike the Crescent Road site, this development has a TRO amendment in place which restricts access to residents' parking permits. But why would the developer apply to have this planning condition lifted, unless they also intended to request for the amendment of the TRO to allow access to residents' parking permits?

This has potential implications not just across Round Hill, which has a third car-free development, but for all the car-free development across Brighton & Hove. The council's list shows there are over 180 car-free roads and over 1000 car-free properties across the city.

This deputation is supported by the local residents' association, Round Hill Society, and the following Round Hill residents:

Supported by:

Dominic Furlong
Jane Power
Ted Power
Kate Rice
Jamie Aitchison
Ann Light

4) Deputation: TRO-22a-2022 and TRO-22bO-2022

Closing Gardner Street to all traffic Mon-Fri (along with the existing closures on a weekend) from 11am – 7pm. There are currently blue badge parking bays in use which will no longer be available.

The council's engagement and consultation with disabled residents has not been inclusive; it has been inadequate and inaccessible. The council under its Public Sector Equality Duty has a responsibility to pay "due regard" and to treat disabled people more favourably and the council also needs to be able to evidence this. Council officers informed us that comments on a TRO can only be received in writing, and no reasonable adjustments were offered. However, Possability People and Badge who have more accessible means of engagement have received a large volume of concerns and objections to the proposed closure.

Gardner Street is a residential area, and this closure would be imposing a curfew on disabled people Imprisoning them in their own homes between the hours of 11am and 7pm. Preventing them from being able to attend essential health appointments or leave the area for any reason which will compromise their health and wellbeing. We contend that is a human rights issue and a safeguarding risk which hasn't been addressed or even mentioned in the EIA. However, the inadequate BHCC EIA being presented to committee states that the only group with protected characteristics that are being disproportionately disadvantaged are disabled people.

The only mitigation offered is that additional blue badge bays are placed in nearby Regent Street. However, it needs to be acknowledged Blue Badge holders are already permitted to park for a limited period, so this "mitigation" does nothing to compensate for taking away the current bays. A further issue that has not been addressed is the distance from Regent St to Gardner St. People qualifying for a blue badge may not be able to walk, or if they can, for only very short distances. The "mitigation" means to access the street, blue badge holders would have to walk at least 150/200m or more and that is just one way. No individual who is in receipt of a mobility component can walk more than 200m. We contend this is not a mitigation but discriminates against 13,500 residents who are blue badge holders.

Apart from Blue Badge holders Gardner St needs to remain accessible for taxis, NHS ambulances or volunteer drivers, in order for drop offs and pick-ups to be made for essential appointments.

The proposal is making this area of the city no go areas for disabled residents and visitors, the Purple Pound is thought to be worth £249 billion (and is expected to increase year on year). Disabled People are customers too.

Unfortunately, the narrative from officers to stakeholders has polarised the debate and has put residents who have objected to the proposal in the position of feeling unsafe. When meeting with the highways department we asked that they look at this issue creatively and look at other solutions or compromises. They have not engaged in the process and continue to take a binary approach, to close or not to close.

The city is in the process of developing an Accessible City Strategy and have committed to working with disabled residents and organisations to make the city welcoming and accessible to all. This proposal is far removed from this commitment.

Supported by:

Geraldine Des Moulins

Graeme Trelford-Davies
Kate Annetts
Pippa Hodge
Rob Arbery

5) Deputation: Clean Air Plan

Many thanks for allowing me to talk to you today. My Name is Dr Daniel Roberts and I am an A & E registrar who is here to represent a concerned group of local healthcare professionals regarding the upcoming clean air plan.

I am also here to talk to you as a proud Brightonian. I grew up in this city and spent my formative years cycling to the level and Christmas shopping on North street. Which is why I was so shocked a few weeks ago when I found out about the high, and illegal levels of pollution in the streets of my hometown.

Not only was I exposed to these high levels of air pollutants; proven to be associated with stunted growth, poor lung development and poor neurodevelopment, but a generation later children are still being exposed to these damaging chemicals. These effects also disproportionately affect poorer children, exacerbating health and social inequalities.

I have worked as an emergency doctor for 7 years and I am unfortunately more than familiar with the devastating effects of asthma, heart attacks, strokes and possibly more impactful than all this; dementia. Often by the time patient's with these conditions get to me it is too late to do anything meaningful. When you approach the new air quality action plan, you have the opportunity to prevent these diseases, as all can be directly caused by air pollution.

Selfishly, I would like to add that , as an emergency doctor, I have more than enough customers at present. I would like to prevent this demand rising, improving air quality is a fantastic way to do this.

So, when I read the draft air quality action plan I was disappointed by the lack of ambition and definitive action.

We should be targeting pollution levels that would be safe for our population. The targets we are currently aiming for will still cause significant health impacts. I am sure you would agree this is unacceptable.

And when will these targets be looked at again? There is little point in writing down these goals if they are not re-examined for another 5 years. More importantly, what can be done if we continue failing to achieve what we set out to do. I don't believe we cannot put the health of our city on pause for 5 years.

Lastly, I urge you to take definite action. I am not here as an expert in town planning or transport. But working in healthcare I am depressingly used to ambitious sounding targets that do nothing to address the core problems.

A ULEZ or Zero Emission Zone has been shown to be one of the most effective ways in which to reduce air pollution. We need a plan to effectively implement this. Brighton & Hove is the largest city in England without a full Smoke Control Area. This also seems to be absent from the plans. In addition, we need incentives to more rapidly and effectively implement an electrified transport network. In the references submitted with this deputation you can see many other examples of UK cities implementation plans.

I would also like to remind you, our elected representatives of the wishes of the people of our city, as demonstrated in our Brighton and Hove climate assembly. A car free city centre, an affordable public transport system and healthier low traffic areas were the top three recommendations. Taking steps to implement these would immensely improve the health of our city in my ways.

I would like to finish by submitting our demands signed by over twenty local healthcare professionals and to urge you to amend the action plan to ensure the health of our planet and city.

- To lower the NO2 and PM2.5 targets to adhere to World health organisation guidelines.
- Interim yearly review (with yearly targets and automatic actions if targets are not met)
- Tighter enforceable regulations

Supported by:

Dominic Nee

Margita Shukla

Rachel Cottam

Catherine Gulliver

Daniel Roberts

Sally Roberts

Supporting Information:

1. Air Pollution Guidelines Targets for Health

Oxford has committed to reducing NO₂ to 30µg/m³ by 2025 (compared to the AQAPs later date of 2027)

https://www.oxford.gov.uk/downloads/file/7428/air_quality_action_plan_2021-2025

Executive summary pg 3 - 'Achieve a local annual mean NO₂ target of 30 µg/m³ by 2025 "30 by 25"'

WHO Objectives are far lower at 10µg/m³ for NO₂ and 5µg/m³ for PM_{2.5})

<https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines>

2. ULEZ / CAZ / ZEZ

London's ULEZ is set to expand to the entire city in 2023. It will include all vehicles with no exemption for residents.

<https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/proposed-ulez-expansion-for-2023>

NO₂ reduced by 20% after London's ULEZ expansion between October 2021 & July 2022, central London has seen a reduction of 44%

<https://www.london.gov.uk/press-releases/mayoral/londoners-breathing-cleaner-air-thanks-to-ulez#>

List of UK cities with a zone or plans for one (London, Oxford, Portsmouth, Birmingham, Bath, Sheffield, Liverpool, Newcastle, Bradford, Bristol, Aberdeen, Dundee, Edinburgh, Glasgow, Manchester)

<https://www.gov.uk/guidance/driving-in-a-clean-air-zone>

https://en.wikipedia.org/wiki/Clean_Air_Zone

<https://www.simplybusiness.co.uk/knowledge/articles/2022/01/new-low-emission-zones-in-the-uk/>

https://en.wikipedia.org/wiki/Low-emission_zone#United_Kingdom

Scotland's four largest cities have already introduced zones that ban every vehicle that does not meet the criteria (euro 6 diesel, euro 4 petrol, Euro VI for buses, coaches and HGVs) no exemption for residents

<https://www.lowemissionzones.scot/about/how-they-work>

Oxford's Zero Emission Zone - four different banding for (ZEV, ULEV, LEV and others)

<https://www.oxfordshire.gov.uk/sites/default/files/image/roads-and-transport/ZEZ.jpg>

<https://www.oxfordshire.gov.uk/residents/roads-and-transport/oxford-zero-emission-zone-zez/charges-oxfords-zez>

New Scientist magazine - Will London's expanded Ultra Low Emission Zone cut air pollution?

Evidence from Europe and Germany and London that they work.

"Simply announcing the start date of a zone usually triggers 'pre-compliance', in which people upgrade their cars to newer, cleaner ones years in advance"

3. Taxis

Cambridge has three levels of taxi licensing prices (ULEZ non compliant, ULEZ compliant and electric).

Taxi licences are free if they have a ZEV, half price for ULEVs

<https://www.cambridge.gov.uk/taxi-licensing-fees>

Brighton has a low number of ZEV taxis, a high number of diesels (see table Taxi Fuel Breakdown Across the Largest UK Cities (%) with sortable columns) and a high number of VW emission scandal implicated vehicles

<https://www.leasefetcher.co.uk/content/greenest-uk-taxi-fleet>

<https://docs.google.com/spreadsheets/d/1sH-JTHaXf2RO9hlqdQ1Hy6TRXMPJosLi/edit#gid=2118569821>

4. Fully electric buses approved

<https://www.sustainable-bus.com/electric-bus/oxford-electric-buses-zebra/>

<https://news.leicester.gov.uk/news-articles/2021/october/leicester-s-electric-bus-fleet-to-top-100-within-three-years-thanks-to-new-funding/>

5. Smoke Control Areas

Brighton & Hove is the largest city in the UK without a full smoke control area

<https://www.brighton-hove.gov.uk/environment/noise-pollution-and-air-quality/smoke-control-areas-map>

https://docs.google.com/spreadsheets/d/1MNutclHYIC_cotarI2cW-rwN_NpYIJwMeyI5Ou3CgnU/edit#gid=0

6. Health

Study <https://www.bmj.com/content/372/bmj.n534>

A short term 10ug/m³ increase in NO₂ concentration associated with 0.46% increase in total mortality

<https://www.gov.uk/government/groups/committee-on-the-medical-effects-of-air-pollutants-comeap>

<https://www.rcplondon.ac.uk/file/2912/download>

<https://www.nice.org.uk/guidance/ng70/chapter/Recommendations> (NICE)

<https://www.healtheffects.org/publications/special-reports>

6) Deputation: Residents' Priorities for Elm Grove

1. Elm Grove is a residential street, with a primary school, nurseries, a hospital, shops, cafes and pubs. Elm Grove has the highest traffic count in the area, twice any other street. Traffic speed is consistently c.50% higher than the 20mph limit. There have been at least four life-threatening accidents in 2022 so far. Pavement parking is unregulated, affecting mobility. Air pollution is more than double the WHO guideline level, and at the junction with Lewes Road hits the UK legal limit.
2. Without a clear design and assessment we cannot know the impact of the Hanover and Turner Low Traffic Neighbourhood pilot on so-called boundary roads like Elm Grove, but similar pilots have seen increased traffic of up to 48%.
3. Residents agree with local Councillors that improvements to Elm Grove and other residential streets should happen first and be permanent. The ETS Committee committed to banning pavement parking by September. £1.1m has been identified for improvements from the Carbon Neutral fund.
4. It is crucial that residents are involved in implementation. All Elm Grove residents were invited to a workshop run by fellow residents to inform an online survey to identify and rank priorities. These are (in order):
 - a. Safe crossings
 - b. Traffic speed restrictions
 - c. Trees, planting and greening
 - d. Street furniture and resurfacing
 - e. Refuse collection
5. A summary of the evidence is overleaf. We invite the ETS Committee and the Council to use this funding to remedy these issues quickly.
6. Residents were also given an opportunity to share any other thoughts in writing. Many expressed dismay about the proposed LTN. Many wanted inset parking bays to allow for better flow and visibility, and greener, cleaner streets. Some wanted to explore cycle lanes, hangars, electric buses, communal spaces, restrictions for non-residential traffic, e.g. a bus gate, and a green wall to shield the school. There were concerns about anti-social behaviour.
7. We are offering to form a working group to act as a critical friend and intelligent customer as BHCC develops detailed plans for our long overlooked street. Will the ETS committee agree to this collaborative approach to improving Elm Grove?
8. As the government has not legislated to ban pavement parking, can you confirm the timetable and actions the council is committed to undertaking?

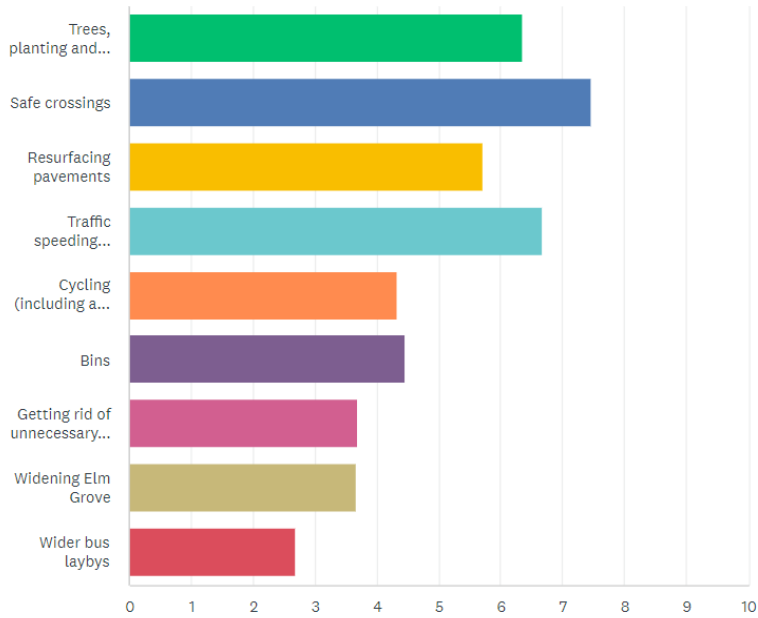
Supported by:

Michelle Patel
Dr Suzanne Neumann
Benjamin Walker
Alison Guile
Annette Kane
Kim Bournell
Chris Gorsuch
Joanne Gorsuch

Survey (run 01/09/22 to 11/09/22) among people who live, work or have a child at school on Elm Grove.

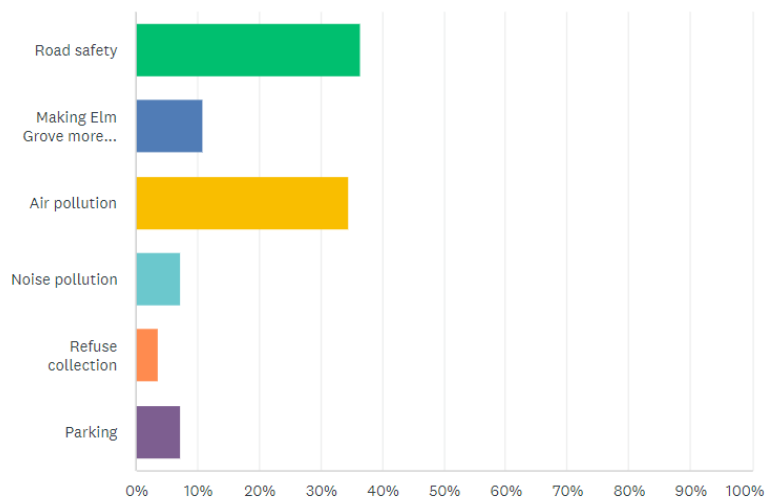
Please look at the list of options below and rank them in order of importance to you, with the most important at the top.

Answered: 55 Skipped: 0



Please pick which one of these is most important to you (this is hard, they are all important!)

Answered: 55 Skipped: 0



Traffic and pavement parking on Elm Grove (Resident photos)



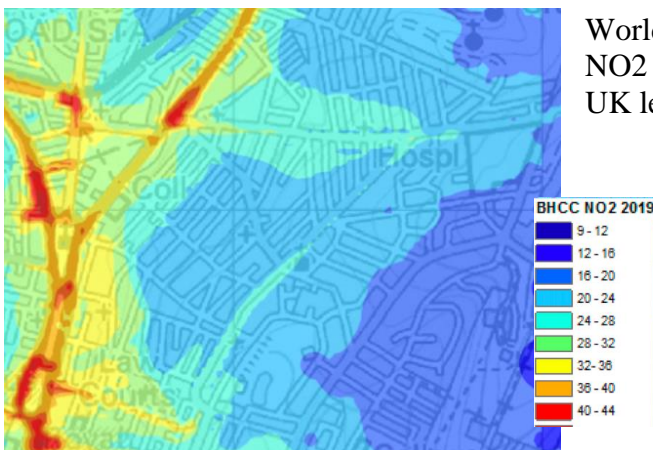
Traffic volumes (BHCC 2022)

Street/ Road	Average Weekday 24hr	Average Weekday AM Peak Hours 7am - 10am	Average Weekday PM Peak Hours 4pm - 7pm
Elm Grove (Between Wellington Street and Bentham Road)	10,583	2,138	2,314
Queens Park Road (Between Albion Hill and Southover Street)	5,267	970	1,224
Kingswood Street (Circus Street and William Street)	3,950	777	897
Southover Street (Between Newhaven Street and Hanover Street)	3,636	641	864
John Street (Between Carlton Hill and Ashton Rise)	2,933	555	689
Ashton Rise (Between John street and Richmond Parade)	2,700	526	614
Carlton Hill (Between Tilbury Place and White Street)	2,597	552	619
Islingword Road (Between Hampden Road and Grant Street)	2,580	485	578
Grove Hill (Richmond Parade and Albion Street)	2,013	300	492

Traffic speeds (BHCC 2022)

Street/ Road	85 th Mile Road Speeds (mph)
Queens Park Road	30 mph
Elm Grove	28 mph
Ashton Rise	27 mph
Grove Hill	27 mph
John Street	26 mph
Kingswood Street	25 mph
Carlton Hill	24 mph
Southover Street	19 mph
Islingword Road	18 mph

Grove (BHCC 2020)



Air quality map for Hanover and Elm

World Health Organisation guidelines require NO₂ to be below 10ug/m³.

UK legal levels must be below 40ug/m³

7) Deputation: Parking Zone V & S

1. In spite of the resounding vote to move to Zone S, Carlyle Street voted to stay in V with 60 - 40% vote for.

2. We understand that the other streets feel that being in S gives them a better opportunity to find parking spaces in the surrounding streets. For Carlyle Street it is the opposite. It is easier and nearer to find spaces in Bentham and the streets below Elm Grove School.

3. Moving back to zone S means that we will now be the light-touch zone and we will suffer particularly at weekends for the free parking this gives at weekends. Anyone can park for free from 7pm on Friday to 9am on Monday morning. This will mean greater difficulty in parking for residents. Also Carlyle will be the first street where this is available.

4. Zone V allows 7 day permit parking, making it easier for residents with permits to park. Having said this, parking in Carlyle is only on one side of the street, making it more difficult for residents. If there are no places available in the street, you at least know that the spaces are filled by fellow residents, not outsiders. This will not be the case in the future as there will only be 10 hours of permit parking during the week as opposed to the 70 hours that we currently have at the moment.

5. In recent years Elm Grove School has tried to stop parents bringing their children to school by car. This has been quite successful. They still have to put bollards in zig zags to stop parking there. Carlyle being in V has also helped as parents cannot use Carlyle to park. This will change when we revert to zone S as parking will now be available in Carlyle, as free parking for all will be in operation.

6. In addition to the fact that Carlyle Street residents voted 60/40 in favour of remaining in V, no Carlyle Street residents were involved in the lobbying to revert the whole Top Triangle back to S - and as such there is no reasonable mandate to include Carlyle Street in any reversion.

Supported by:

Allen Lawrence
Steve Requena
Imogen Haslam
Philip Goldsmith
Kate Williams
Roger Paine
David Capon
Scott Duncan
Vic Craggs
Chloe Davies
Dan Shires
Caroline Law

