

Subject:	Brighton & Hove 20mph Limit Phase 2 – Results of Public Consultation		
Date of Meeting:	11 December 2013		
Report of:	Executive Director Environment, Development & Housing		
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Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The purpose of this report is to outline the results of recent public consultation on proposals for Phase 2 of the 20mph programme, to present the revised proposals for Phase 2 informed by the findings of the consultation and to seek approval to progress to the next stage of consultation namely the advertising of Speed Limit Orders.
- 1.2. The aims of the 20mph programme in Brighton & Hove are:
- To reduce risk (perceived and actual) of the number and severity of road collisions casualties
 - To help create pleasant, people-centred, streets and public space
 - To encourage and enable more active travel
 - To encourage and enable independent mobility for children, older and other vulnerable people in the City

2. RECOMMENDATIONS:

- 2.1 That the Committee notes the results of the public consultation on proposals to implement a City-wide 20mph scheme.
- 2.2 That the Committee authorises officers to proceed with advertising the formal Speed Limit Orders (SLO) for the changes in speed limit as described in the revised Phase 2 proposals outlined in this report and presented in map format in Appendix 1.

3 CONTEXT/ BACKGROUND INFORMATION

- 3.1 In May 2010, following an investigation into 20mph speed limits and zones by the Environment and Community Safety Overview and Scrutiny Committee (ECSOSC), the panel produced a report containing 15 recommendations (see Background Document 1). In broad terms, the main recommendation was the wider implementation of 20mph speed limits in residential areas and on the

roads outside schools, routes to schools, roads outside parks and playgrounds, sports and leisure facilities, community buildings, older people's care homes, local shops and on roads in busy shopping areas.

- 3.2 In October 2011, the Department for Transport (DfT) set out a new policy framework for the country's traffic sign systems. Included in this were provisions making it easier for councils to introduce 20mph schemes. This takes the form of a reduction in the need for physical traffic calming measures in 20mph zones by expanding the list of permitted traffic calming measures to include repeater signs and reducing the need for road humps and chicanes.
- 3.3 An outline proposal for the phased introduction of 20mph speed restrictions across the City was considered at the Environment Transport and Sustainability Cabinet Member Meeting in May 2012 where the principles of the proposed outline implementation programme (see Background Document 4) were agreed. Permission was granted to undertake city wide stakeholder and public consultation, preparatory research, surveys and street character assessments.
- 3.4 On 15th January 2013 the Brighton & Hove City Council Transport Committee granted approval for the first phase of implementation of 20mph speed limit programme in central Brighton and Hove (see Background Document 6). The limit came into force on 8th April 2013.

4 COMMUNITY ENGAGEMENT & CONSULTATION

Public Consultation

- 4.1 Initial city wide public consultation took place between 17th June and 10th August 2012. A total of 3689 people responded as part of the consultation with 55 % in favour and 44.5% against the proposal to introduce 20mph limits. Detailed results from this consultation are reported in Background Document 5.
- 4.2 Speed Limit Orders for the Phase 1 area were advertised between 13th December 2012 and 3rd January 2013. Responses to the advertisement and officers responses to the issues raised are reported in Background Document 6.
- 4.3 Public consultation on the Phase 2 proposals took place between 13th August and 4th October 2013 with the full results shown in Appendix 2. The consultation was carried out utilising 57,989 surveys which were sent across nine neighbourhood consultation areas. Area specific consultation materials and surveys were sent to every address, residential and commercial, within the Phase 2 area.
- 4.4 A total of 28 staffed exhibitions and residents groups meetings were held and/or attended by officers at 18 locations across the city where the public could discuss the proposals with officers and survey forms were available to those who had not received them in the post.
- 4.5 The surveys for all nine consultation areas were available on-line via the Council's website consultation portal. The public consultation was widespread, well publicised, reported via local media, social media and by direct mail and email and open to all.

Headline Results

- 4.6 A total of 14,952 people responded as part of the consultation. 11,670 responses were printed questionnaires and 1906 respondents completed surveys via the councils' online consultation portal. With regards to the portal, 328 people completed a questionnaire for more than one area such that 1906 respondents online completed 3282 online questionnaires.
- 4.7 A majority (51%) of people responded that they supported 20mph on their own street. This increased to 53% when only the responses from those living within the Phase 2 area were considered.
- 4.8 When asked if they supported the proposals for Phase 2 as set out in the consultation materials only 44% indicated that they supported the proposals as they stood. Further analysis of the responses found that there were a number of reasons cited for this including specific objections to the inclusion or exclusion of a particular road (i.e. they did not support a specific road being proposed to reduce to 20mph or they did not support a specific road being proposed to retain its existing limit), or simply an objection to the whole scheme under a wide range of themes which are explored in this report.
- 4.9 The results of the consultation suggest a clear majority of respondents in most individual areas support the introduction of 20mph limits on the street that they live on. There are, however, some identifiable areas where the majority of residents do not support lower speed limits.

Consultation Area	Residents supporting 20mph on the street that they lived
West Hove	55%
Dyke Road West	40%
Dyke Road East	53%
Preston	63%
Patcham & Hollingbury	47%
Hollingdean & S. Moulsecoomb	55%
Coldean	57%
Bevendean & N. Mouslecoomb	55%
East Brighton	55%

Petitions

- 4.10 A petition signed by 236 people was received by the Transport Planning Team, stating that "We the undersigned hereby object to the proposals to introduce 20mph Blanket Speed Limits in Phase 2." No named contact person or covering letter accompanied the petition to enable officers to contact the petition organisers.

- 4.11 In response to the petition, it is confirmed that there are no plans, either in the Consultation proposals or in the revised plans for Phase 2 for a blanket speed limit. The proposed speed limits for roads within the Phase 2 area have been determined in accordance with evidence and the consultation results as set out below.

Stakeholder Meetings/Correspondence

- 4.12 A meeting was held with Sussex Police and Sussex Safer Roads Partnership to discuss the detailed proposals for the phase 2 area on 8th August 2013. No objections have been received from the Police or the Partnership regarding the proposals for Phase 2 of the 20mph scheme.
- 4.13 A meeting was held with the Brighton and Hove Bus Company to discuss the detailed proposals for the Phase 2 area on 16th July 2013. At the meeting and by subsequent letter the Bus Company requested the removal of a number of bus routes from Phase 2 implementation over concerns that increased journey times would impact on the commercial viability of bus services. These roads were Portland Road, Eastern Road, Whitehawk Road and Whitehawk Way, Shirley Drive, Surrenden Road, Braybon Avenue, Carden Avenue, Crowhurst Road, Winfield Avenue, Patchdean, and Carden Hill between Carden Avenue and Woodbourne Avenue.
- 4.14 In their written response to the consultation the Bus Company expressed support for 20mph on a number of roads and sections of road. These were: Freshfield Road (south of Manor Hill), Ditchling Road (from the Phase 1 boundary as far as Upper Hollingdean Road) and Preston Road (from the Phase 1 boundary as far as Stanford Avenue).
- 4.15 A written response was received from Brighton Area Buswatch. The group, whilst understanding the reasons for the proposed 20mph limits, expressed concerns about negative impact lower speed limits might have on bus services, particularly on supported services. The group support the bus company requests that the following roads retain their existing limits; Portland Road, Shirley Drive, Surrenden Road, Braybon Avenue, Carden Avenue, Winfield Avenue, Crowhurst Road, Carden Hill (north of Keymer Road), Eastern Road, Whitehawk Way (except between Whitehawk Road and Piltdown Road where the group support 20mph) and Roedean Road.
- 4.16 The Buswatch Group also used their written response to express support for requests made also by Friends of the Earth for 20mph on a number of roads and sections of road. These were: Freshfield Road (between Manor Hill/Firle Road and Queens Park Terrace), Ditchling Road (from the Phase 1 boundary as far as Fiveways) and Preston Road (from the Phase 1 boundary to just north of the zebra crossing by the southern end of Preston Park).
- 4.17 In addition the Buswatch group requested that the potential of variable speed limits be considered if possible.
- 4.18 A written response was received from Brighton & Hove Friends of the Earth (BHFOE). The group welcomed and supported the second phase of the 20mph programme citing the programme aims to reduce traffic speeds and improve

safety on the roads by reducing the number and severity of casualties. They commented that the lower limits would help smooth traffic flow and if combined with more people being encouraged to leave their cars at home, this could reduce air pollution, resulting in a healthier population and reduced employee absenteeism.

- 4.19 BHFOE did however express concerns about the impact of lower speed limits on evening and early morning bus services and taxi journeys which might be caused by increased journey times and the potential of this to encourage existing bus users back into their cars and to isolate outlying estates reliant on bus services. Consequently they supported the bus company requests for the following roads to be excluded from the 20mph limit; Portland Road, Shirley Drive, Surrenden Road, Braybon Avenue, Carden Avenue, Winfield Avenue, Carden Hill (north of Keymer Road), Eastern Road, Whitehawk Way (except between Whitehawk Road and Piltdown Road where the group support 20mph), Roedean Road and Arundel Road north of Eastern Road.
- 4.20 BHFOE also used their written response to express support for 20mph on a number of roads and sections of road identified in the consultation materials. These were: Freshfield Road, Upper Bedford St and Bedford St (south of Manor Hill), Ditchling Road (from the Phase 1 boundary as far as Fiveways), Preston Road (from the Phase 1 boundary to just north of the zebra crossing by the southern end of Preston Park), Hollingdean Road, Peacock Lane, Bear Road (south of Bevendean Rd), Madeira Drive and Dukes Mound. They also expressed a desire to see Mill Road (which was outside the Phase 2 consultation area) to be reduced from 60mph to 40mph.
- 4.21 A written response was received from the Woodland Drive Action Committee which supported the 20mph proposals for the Dyke Road West consultation Area, supported 20mph for Shirley Drive and requested 20mph for Woodland drive, a road with existing traffic calming measures.
- 4.22 A total of 40 letters were received via MP Simon Kirby which he had received relating to Freshfield Road in the East Brighton Consultation area. A total of 40 letters were received of which 9 opposed reducing the limit to 20mph and 31 were in favour.
- 4.23 A small number of written consultation responses in the form of letters (6) and emails (16) were received from individual residents directly by the Transport Planning Team expressing both support (14) and opposition (8) to the Phase 2 proposals. Specific roads on which the limit was supported were Barn Rise, Church Road, roads around Patcham Schools, Freshfield Road, Ditchling Road, Friar Road, Dyke Road Avenue and the whole of the Preston Area. Only one specific road was opposed (Surrenden Road) with the remaining communications being general opposition to the programme as a whole.
- 4.24 A meeting was held between officers and representatives of the Taxi Trade to discuss the detailed proposals of the phase 2 area on, 11th September 2013 . In addition the programme Manager attended the Taxi Forum on 5th September 2013 and on 17th October 2013, where the Phase 2 proposals were discussed in detail and issues raised by members of the forum were considered and noted for investigation. At these meetings officers discussed in detail with taxi

representatives the concerns and objections to the scheme from the trade. This focused on concerns about increased journey times and negative impacts on drivers in terms of income and their personal safety as well as identification of specific roads that the trade would like to see excluded from the scheme and are detailed in paragraph 4.28.

- 4.25 Written responses from the taxi trade were received from Howlet Clarke Solicitors (representing Southern Taxi -Brighton & Hove City Cabs, Brighton & Hove Streamline and Brighton & Hove Radio Cabs) and the GMB Brighton & Hove Taxi Section.
- 4.26 The GMB Brighton & Hove Taxi Section declined to participate in meetings with officers to discuss the consultation proposal on the grounds that the consultation was "flawed", the consultation materials misleading and that the Council had already announced what it planned to do without having the necessary monitoring information. The GMB BH taxi section reported their belief that a blanket 20mph limit was dangerous, that drivers were ignoring the limit in the Phase 1 area to the detriment of areas around schools and hospitals and that the programme was a waste of money.
- 4.27 Issues raised by the Taxi trade in their correspondence focused on
- Concerns about increased journey times which it is claimed would lead to
 - negative impact on drivers in terms of income and their personal safety
 - increased costs for social and education services where taxis transport vulnerable people
 - impacts on the city centre should taxi not be able to quickly remove people late in the evenings
 - Claims that the consultation on Phase 2 was premature as there was inadequate evidence of the benefits of a lower speed limit
 - Claims that the limits would increase collisions on arterial roads
 - Claims that 20mph limits would increase air pollution and fuel consumption
 - Claims that 20mph limits would have a negative impact on the local economy
 - Claims that the Council had not properly taken into account the practicalities of police enforcement which was leading to "widespread disregard" for the limit
 - Claims that the consultation has not been legally undertaken by the Council and that it had been undertaken in a biased manner
 - Opposition to a "blanket" 20mph limit with requests for smaller 20mph zones around schools and hospitals
- 4.28 It is noted that in the correspondence from Howlet Clarke Solicitors, Streamline are specifically stated to oppose Phase 2 of the 20mph programme in its entirety and in particular are opposed to 20mph on all the roads that the consultation proposed to retain their existing limits, all the roads that were specifically marked for comment in the consultation, with the exception of Shirley Drive which is not listed in the letter and the following additional roads; Roedean, Goldstone Crescent, Carden Hill, Valley Drive, Eldred Avenue, Ladies Mile Road, Mackie Avenue, Stanford Avenue, Preston Drive, Preston Park Avenue and The Upper Drive.
- 4.29 In addition to the correspondence described above, Brighton & Hove Streamline Ltd submitted responses to a questionnaire they had devised themselves,

completed by 100 people and which, the covering letter states, is being submitted as a petition. The questionnaire responses do not follow the proper format or processes for a petition they are nevertheless considered here as part of the consultation responses. All 100 people provided the same response to 5 questions stating that they were 1) not in favour of any 20mph limits in Brighton & Hove, that 2) they were not in favour of widespread 20mph limits, that 3) they were not in favour of 20mph on all except arterial roads, that 4) they were in favour of 30mph limits on the roads which the consultation proposed to retain their existing limits at 30mph or which were marked for specific comment in the consultation and that 5) they were in favour of "a number of major routes" being reclassified as 30mph. Questions 3, 4, and 5 referred to a map which was not provided with the question responses so officers have been unable to identify which roads are specifically being referred to.

- 4.30 In addition to the above meetings and communications, at the request of their teacher, 3 workshops were hosted for A level Geography students of BHASVIC to explain the consultation proposals and answer questions. It is understood that the students responded online to the consultation as part of their classroom activities.

Summary & Discussion

- 4.31 The majority of reasons provided for supporting and opposing the proposals were the same as those raised with regards to the Phase 1 area. These issues were addressed at length in the Committee report presented to and debated by the Transport Committee in January 2013 (Background Document 6). As such this report does not repeat the information provided previously but rather addresses only those issues which are new, those that are specific to the Phase 2 consultation and those where new evidence has become available.

Monitoring of Phase 1

- 4.32 A small number of respondents to the consultation (2%) and the taxi trade representatives objected to the Phase 2 proposals on the grounds that a second phase should not be considered until evidence was available to show that the first phase has worked. Views were expressed that drivers were ignoring the limits and that speeds had not reduced.
- 4.33 There is significant and growing evidence from other cities of the success of 20mph speed limits in reducing the number and severity of collisions and there is no reason to assume that the same will not prove to be true in Brighton & Hove. Recent data from Oxford quoted by the taxi trade as evidence of an increase in accidents as a result of 20mph refers to a news report highlighting an 18% decrease in the total number of collisions. Officers are aware that in this report figures were provided showing small increases in the numbers of collisions on 3 specific Oxford roads but no indication is given as to the specific reasons for these increases which saw an additional 6 collisions occur across all three cited roads. Officers have been monitoring the Phase 1 area both before (to establish baselines) and after its implementation in April 2013.
- 4.34 Interim results from the first comprehensive speed surveys that were undertaken across the area in September 2013 have shown a decrease in speeds on 74% of roads. Whilst the average reduction across the area has been 1.2mph (which is

in line with DfT expectations and estimated by them to result in a 6% decrease in casualties) some individual roads have decreased by more than this for example speeds on Edward Street have decreased by 2mph, on Upper Rock Gardens by 9mph, on First Avenue by 4mph and on Upper Lewes Road by 5mph.

- 4.35 With only 6 months having passed since the implementation there is limited collision and casualty data available as yet for monitoring, however figures for this year show that in the city speed related collisions are significantly below the numbers predicted for this year. Within the Phase 1 area there have been no fatal collisions since the implementation of the 20mph limit and overall there has been a 20% decrease in the number of collisions and a 19% decrease in the number of casualties based on 5 months of 2013 data compared with the 3 year average for the same 5 months in the previous three years.
- 4.36 It should be noted that the figures presented here can only be considered indicative at this stage and in order to have truly statistically robust data it is preferable to have 3 full years worth of monitoring data and this will ensure that findings are not skewed by seasonal variations or unique/one off events. It remains the intention to prepare and publish detailed monitoring reports at 18 months and 3 years after implementation of the new limit as these time periods will allow statistically robust claims to be made, however, the interim results to date are in line with the positive results seen by other cities and provide an indication of success even at this very early stage.

Air Quality

- 4.37 A significant number (12%) of those who responded to the consultation, including the representatives of the taxi trade, voiced their concerns as to the impact that driving at slower speeds in the city would have on air quality and air pollution. Whilst it remains the case that evidence is limited on this topic, with much of the evidence quoted in the consultation responses dating from 2000 and based on track tests, studies at motorway level or relating to 20mph zones (featuring vertical deflection measures – i.e. road humps) as opposed to limits, a new study was this year undertaken by Imperial College London (commissioned by the City of London) entitled “An evaluation of the estimated impacts on vehicle emissions of a 20mph speed restriction in central London.” Whilst the study was clearly focused on the London street environment it is considered that the findings are relevant to other cities and large urban areas such as Brighton & Hove.
- 4.38 The study found that:
- There was a greater range of vehicle speeds on 30mph roads compared to 20mph roads
 - That a greater proportion of time was spent accelerating and decelerating on 30mph roads than at 20mph and that “it is therefore to be expected that the less dynamic drive cycles associated with 20mph roads would lead to reduced levels of particulate matter (PM) emissions from non exhaust sources”
 - “It would be incorrect to assume that 20mph speed restrictions would be detrimental to ambient local air quality... [or that] air quality is unlikely to be made worse as a result of 20mph speed limits”
- 4.39 The World Health Organisation factsheet on air pollution states that by reducing PM10 pollution from 70 to 20 micrograms per cubic metre, we can cut air quality related deaths by around 15%. Given that PM affects more people than any other

pollutant, the potential for lower speed limits to see a reduction in this specific air pollutant is regarded as a benefit.

Legality and enforceability of a 20mph limit

- 4.40 The consultation period has highlighted a perception by many drivers in the city that the 20mph limits, where they are in place, are advisory, not legal and consequently not enforceable.
- 4.41 Under Section 84 of the Road Traffic Act 1984, local Authorities have the power to set speed limits on their roads, including limits of 20mph. Where such limits are signed and have been made under the correct Speed Limit Orders, they are legal and they are enforceable.
- 4.42 Sussex Police and the Safer Roads Partnership have stated publically that they are able to enforce the 20mph limit. Recently updated guidance from the Association of Chief Police Officers (ACPO) has confirmed that speed equipment is approved for 20mph enforcement and introduced guidelines on fixed penalty notices and speed awareness courses for speeding offences in 20mph limit area. Sussex police have been involved in the design stages of the Phase 2 proposals just as they were with Phase 1.
- 4.43 It is recognised that police resources are limited. However, the proposals for the Phase 2 area comply with the Department for Transport guidance for self enforcing schemes, just as those for the Phase 1 area did. Officers will continue to work in partnership with the Police on driver education initiatives to seek increased compliance and through the monitoring of the 20mph limit area, will seek to provide the Police with intelligence to enable targeted enforcement activity should that be deemed appropriate.
- 4.44 Officers will work to run a communications exercise to promote the message that “Where it’s the limit – it’s the law” to educate drivers and reinforce the message that the 20mph limit is legally enforceable.

Revised proposals

- 4.45 Taking into consideration the results of the consultation officers have produced revised proposals for the Phase 2 area which are now recommended to proceed to the next stage of consultation, namely the advertising of Speed Limit Orders.
- 4.46 Officer recommendations on revised proposals for each area are detailed below and provided in map format as appendix 1 of this report:
- 4.47 **West Hove**
Roads to retain their existing limits: Kingsway, Old Shoreham Road, New Church Road, Sackville Road and all pre-existing 20mph limit roads. All other roads in this area, including Portland Road, to be reduced to 20mph.
- 4.48 It is acknowledged that Portland Road was a road specifically requested by stakeholders, most notably the bus company, to remain at 30mph. In addition, it is noted that the results of the public consultation showed a majority in favour of retaining the existing limit on this road including amongst those who live on the road. It remains, however, the officers recommendation that the speed limit on Portland Road be reduced to 20mph on the grounds that this road has a

particularly poor road safety record over the last three years. More collisions (44) and casualties (50) have occurred on Portland Road than on any other road in the entire Phase 2 area. Of the seven identified collision clusters (a single point where 5 or more collisions have occurred in the last three years), three of these are located on Portland Road. In addition the road is the location of a large Primary school and at the eastern end is a busy shopping street with high numbers of pedestrians.

4.49 **Dyke Road West**

All roads to retain their existing limits with the exception of a small number of roads surrounding school locations, which are east of (but not including) Shirley Drive and south of (and including the eastern section of) The Droveaway.

4.50 It is clear from the consultation that the majority of respondents, including the majority of those resident in the area are opposed to 20mph in the Dyke Road West Area. Whilst the Woodland Drive Action Group expressed their support for 20mph on their road this was not supported by the responses received by residents from this road, 54% of whom opposed lowering the limit. The area as a whole has a relatively small number of collisions and casualties, however the southern tip of this area is the location of a number of schools. It is therefore recommended that limits in a small area east of Shirley Drive and south of (and including the eastern section of) The Droveaway are reduced to create a 20mph limit around the schools located in this area. Residential support for 20mph on these roads was in the majority at 58% and the road network allows a coherent 20mph limit area to be created.

4.51 **Dyke Road East**

It is recommended that Dyke Road, Dyke Road Avenue and the A23 (London Road) retain their existing speed limits. In addition it is recommended that all roads in the northern (Westdene) area of this consultation area retain their current speed limits with the exception Bankside, Barn Rise, Dene Vale and the southern section of Mill Rise which are recommended to be reduced to 20mph in order to create a lower speed limit in the area around Westdene Primary School .

4.52 It is recommended that the western end of Tongdean Lane, Wayland Avenue, and all roads south of Wayland Avenue in this area are reduced to 20mph.

4.53 Whilst the overall consultation results for the Dyke Road East area showed a majority in support of 20mph limit, more detailed analysis of the responses showed a distinct north/south divide in that support whereby there was very little support in Westdene (just 38%) in the north than the overall figures would suggest and significantly greater support (66%) in the south than the overall figures would suggest. As such it is considered practical to offer separate recommendations for each area.

4.54 **Preston**

It is recommended that the A23 (Preston Road) retain its existing limit and that, on the basis that the consultation proposals had a clear majority (63%) in favour, within the Preston area be reduced to 20mph. It is noted that infrastructure works to improve pedestrian crossings are already planned for Surrenden Road and should be implemented prior to the implementation of the lower limit. It is

considered that this will, together with appropriate signage and road marking, ensure the limit can be self enforcing on this road.

4.55 Patcham and Hollingbury

It is recommended that the roads to the north of Ladies Miles Road (namely the Mackie estate, Vale Avenue and Church Hill) together with Carden Avenue, Crowhurst Road, Patchdean, Winfield Avenue and Overhill Gardens all retain their existing limits. This is in response to the fact that the majority of residents in this area stated that they did not support 20mph on their roads. That all roads south of Carden Avenue be reduced to 20mph and that roads north of Carden Avenue, with the exception of those already indicated, up to and including Ladies Mile Road be reduced to 20mph to provide slower speeds in the roads around the Patcham Schools, Library and Community Centre.

4.56 It is also recommended that officers investigate options for infrastructure works that could improve safety for pedestrians on both Winfield Avenue and Carden Avenue. Carden Avenue in particular, whilst being a principle road which it is not considered appropriate to reduce to 20mph, has a high number of collisions (24) and casualties (31) in the past three years and as such any safety improvements that can be made should be investigated.

4.57 Coldean

On the basis that the consultation proposals had a clear majority (57%) in favour, it is recommended that all roads within the Coldean area be reduced to 20mph and that Coldean Lane be reduced from 40mph to 30mph as outlined in the consultation proposals.

4.58 Hollingdean and South Moulsecoomb

It is recommended that Lewes Road retain its existing limit and that the 20mph limit on Ditchling Road be extended north to Fiveways thus bringing the Downs Infant School within the lower limit area and creating a clear gateway to the central area and Downs Junior School which has an entrance on Ditchling Road. On the basis that the consultation proposals had a clear majority support (55%) in favour it is recommended that all other roads within this area be reduced to 20mph.

4.59 Bevendean and north Moulsecoomb

On the basis that the majority of the roads in Bevendean have a pre-existing 20mph, traffic calmed, speed limit and that the consultation proposals had a clear majority (55%) in favour, it is recommended that all roads within the Bevendean and Moulsecoomb area (East of Lewes Road) be reduced to 20mph

4.60 East Brighton

It is recommended that the following roads retain their existing speed limits: Marine Parade, Roedean Road, Royal Crescent, Marine Square, Warren Road and Wilson Avenue and that all other roads in the area be reduced to 20mph.

4.61 A number of roads within this area were marked for specific comment in the consultation and are considered below:

- 4.62 It is recommended that Freshfield Road, Upper Bedford St and Bedford St be reduced to 20mph. The consultation showed that there was significant support for lowering the speed limits on these roads with 78% of residents on Freshfield Road supporting 20mph on this road. It is however, given the current speeds on Freshfield Road, recommended that officers investigate options for infrastructure works that could assist with making 20mph self enforcing on this road, for example improved pedestrian crossing facilities.
- 4.63 It is recommended that Eastern Road be reduced to 20mph. It is acknowledged that Eastern Road was a road specifically requested by stakeholders, most notably the bus company, to remain at 30mph, however, this road is second only to Portland Road in the Phase 2 area in the number of collisions (31) and casualties (39) that have occurred in the last three years. It is also the location of a large hospital and a college making it a destination for vulnerable people. In addition the majority (55%) of residents of Eastern Road who responded to the consultation stated that they supported 20mph for their road.
- 4.64 It is recommended that Whitehawk Road and Whitehawk Way be reduced to 20mph. These roads, whilst a bus route, run through a heavily populated residential estate. Together they have experienced high numbers of collisions (21) and casualties (18) in the last three years. The area is in the 5% most deprived areas in England. Given that road safety provides evidence that there is an increased risk of road traffic injury amongst people and particularly children, in disadvantaged communities it is recommended that the speed limit be reduced to 20mph. It is recommended that officers investigate options for infrastructure works that could assist with making 20mph self enforcing on this road, particularly at its northern most sections.
- 4.65 Officers appreciate and have considered fully the concerns raised by the bus company with regards to cross city services which travel along Eastern Road and Whitehawk Way/Whitehawk Road. It is considered that the benefits that will be provided to bus services in the area by the works which have recently commenced under the Better Bus Areas programme, with the introduction of bus priority signals and bus lanes, will more than compensate for any small amount of time lost by the lower speed limit in this area.

5 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

Part time limits

- 5.1 Officers have investigated the possibility of variable speed limits at length as was outlined in the Committee report of January 2013 (Background Document 6). Further advice has been sought from the Department for Transport (DfT) on this matter and they have confirmed that authorisation to use part-time advisory 20 mph speed limits signage is specific to areas outside schools, where there is an obvious hazard at certain times of day and that DfT would not authorise the use of speed limit roundels with sub plates displaying times. Whilst variable messaging signage would be legally possible it would require a significant number of signs for each stretch of road concerned – a minimum of 8 for a discreet section of road assuming no side roads. DfT have confirmed that whilst, in theory this is possible, it would add significantly to street clutter and be incredibly expensive. They have confirmed Council officers views also that such an approach may not be safe in that it could cause confusion for drivers. They

have also questioned the safety implications of this due to the potential for driver confusion. For the reasons provided part time limits are not considered a viable option.

6. CONCLUSION

- 6.1 The majority of those who responded to the Phase 2 consultation supported the introduction of 20mph on the street on which they lived.
- 6.2 Differences within areas in terms of local community support have resulted in officers developing revised proposals for the Phase 2 area to retain existing speed limits not only along arterial routes into, out of and across the city as previously proposed but also in certain residential areas where the proposals did not have the support of the majority of the community.
- 6.3 The benefits of 20mph limits are recognised nationally and internationally and interim monitoring of the Phase 1 area of central Brighton & Hove indicates that they are starting to be realised in the city after just 6 months.
- 6.4 Under the revised proposals for phase 2 as outlined above, 59% of people living in the Phase 2 area would have the speed limit they want for the street on which they live.

Consultation Area	% people getting the speed limit they want on the road that they live
West Hove	59%
Dyke Road West	60%
Dyke Road East	62%
Preston	64%
Patcham & Hollingbury	52%
Hollingdean & S. Moulsecoomb	56%
Coldean	60%
Bevendean & N. Mouslecoomb	55%
East Brighton	59%
All of Phase 2 Consultation Area	59%

- 6.5 No final decision will be taken on the revised proposals for Phase 2 until the responses to the advertisement of the Speed Limit Orders have been reviewed and reported back to the Environment, Transport and Sustainability Committee. It is expected that this could happen in March 2014, should approval be granted to advertise.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 Capital: The sum of £0.350million has been allocated for the introduction of 20mph speed reductions in the city, as part of the Local Transport Plan Capital Budget for 2013-14.
- 7.2 Ongoing maintenance of the scheme will be funded from within existing Transport budgets.

Finance Officer Consulted: Jeff Coates

Date: 22/11/2013

Legal Implications:

- 7.3 The Council's powers and duties under the Road Traffic Regulation Act 1984 must be exercised to secure the expeditious, convenient and safe movement of all types of traffic including cyclists and pedestrians. As far as is practicable, the Council should have regard to any implications in relation to:- access to premises; the effect on amenities; the Council's air quality strategy; facilitating the passage of public services vehicles; securing the safety and convenience of users; any other matters that appear relevant to the Council.
- 7.4 The Council has to follow the rules on consultation set out by the government and the courts. The Council must ensure that the consultation process is carried out at a time when proposals are still at their formative stage, that sufficient reasons and adequate time must be given to allow intelligent consideration and responses and that results are properly taken into account in finalising the proposals.
- 7.5 After the proposals are formally advertised, the Council can, in the light of objections / representations received, decide to re-consult either widely or specifically when it believes that it would be appropriate before deciding the final composition of any associated orders. Where there are unresolved objections to the Speed Limit Orders, then the matter is required to return to Transport Committee for a decision.

Lawyer Consulted:

Carl Hearsum

Date: 22/11/13

Equalities Implications:

- 7.6 The scheme should improve conditions for vulnerable road users and has the potential to ease community severance by aiding the development of healthy and sustainable places and communities. In reducing the perception of road danger the scheme should enable children, young people and adults to make more and better use of their local streets.

Sustainability Implications:

- 7.7 The proposed scheme should assist the Council in encouraging more sustainable transport use such as walking and cycling by reducing vehicle

speeds and improving safety and the perception that the streets are safer and more user friendly. Any modal shift to more sustainable transport achieved as a result of the wider implementation of 20mph speed limits will also assist in improving air quality and reducing carbon emissions contributing to the Council's 'One Planet Living' programme.

Crime & Disorder Implications:

- 7.8 Issues relating to the prevention of crime and disorder were raised once again through consultation with the taxi trade. In particular the issues of personal attacks on drivers and the implications of the lower speed limit on the ability of taxi services to "clear" ranks in the evening, particularly on weekend nights.
- 7.9 Officers have continued to investigate these issues and whilst continuing to understand the concerns and the reasons behind them remain unable to find any evidence that suggests these concerns have or will be realised. Officers produced some in cab stickers with the message "Where it's the limit It's the law" for taxi drivers to display in their cars to inform customers that new limits had been introduced by the Council and that where they were in place drivers, including taxi drivers, should drive within it. Whilst a number of independent taxi drivers accepted the stickers, the trade representatives from the taxi unions and taxi companies in the city refused to accept the resources. Officers stated that they were willing to produce alternative resources or communication campaigns and invited the trade to provide suggestions. To date no requests or suggestions have been made. Officers will continue to liaise with the taxi trade and the Police to monitor this issue.

Risk and Opportunity Management Implications:

- 7.10 There is a risk that the desired outcomes of the scheme will not be fully realised. Interim monitoring, however, suggests that this risk is very low and comprehensive monitoring will continue both in the Phase 1 area and in the Phase 2 area should it progress to ensure that any issues are identified, addresses and where necessary remedial action taken.

Public Health Implications:

- 7.11 Road casualty reduction is a Public Health priority and an indicator for Domain 1 of the Public Health Outcomes Framework 2013-2016. It is anticipated that the reduction in speed limits to 20mph in residential and commercial areas will help to reduce collisions and the severity of the outcome of some collisions. It is estimated that over 95% of pedestrians involved in a collision at 20mph survive, compared with only 80% at 30mph. A review of the impact of introducing 20mph zones in London over a twenty year period (Grundy et al 2009) demonstrated a reduction in road casualties particularly amongst young children.
- 7.12 It is likely that the scheme will support people to choose more physically active lifestyles by opting to make healthier active travel choices such as walking and cycling. Physically active adults have less risk of premature death and of chronic diseases with the direct cost of physical inactivity to the NHS across the UK is

estimated to be £1.06 billion. For Brighton & Hove this cost is estimated to be **£3,077,340**

- 7.13 Promoting active travel can bring important health benefits but also contributes to objectives in relation to sustainability & congestion & air pollution, especially to reduction in particulate matter. This is discussed above in paragraph 4.40.
- 7.14 NICE guidance PH 8, PH 25 and PH 31 all recommend speed restrictions and the prioritisation of pedestrian and cyclists as means to improve public health

Corporate / Citywide Implications:

- 7.15 The proposed scheme will assist the Council to meet its strategic objectives and will contribute to the Council's and partners' wider objectives including those set out in the Corporate Plan and the Sustainable Community Strategy.
- 7.16 Brighton and Hove Bus Company have raised concerns about the impact of the 20mph speed limits in the off peak hours on a number of cross city bus routes. Research carried out whilst preparing the proposals, together with the growing evidence base of actual impacts of such schemes in other areas and in the Phase 1 area, indicate that such concerns are unlikely to be realised as a result of the revised Phase 2 proposals. A significant number of roads have been excluded from the scheme, many of them requested by the bus company. In addition bus priority works being undertaken in a number of roads in the city and in the phase 2 area will provide time savings for buses that officers consider will more than compensate for any minor journey delays that could be caused by lower speed limits. Monitoring will however continue to be undertaken on this issue.

SUPPORTING DOCUMENTATION

Appendices:

- 1. Plan showing revised Phase 2 area
- 2. 20mph Phase 2 Public Consultation Report

Documents in Members' Rooms

- 1. Copies of the written consultation responses received from -
 - GMB
 - Woodland Drive Action Committee
 - Mr Chapman
 - Streamline
 - JustFlights
 - Swift Ceilings

Petition
Friends of the Earth
Brighton & Hove Bus and Coach Company
Bus Users UK
Southern Taxi's, Brighton Streamline, Brighton & Hove Radio Cabs

Background Documents

1. Environment and Community Safety Overview and Scrutiny Committee (ECSOSC) report on 20mph (2010)
2. Speed Limit Review – A & B Class Roads (September 2010)
3. Speed Limit review – 20mph Pilot Schemes (June 2011)
4. Environment and Transport Sustainability Cabinet Member Meeting – “Brighton & Hove – A 20mph City” report (May 2012)
5. Item 32 – Transport Committee Report - “Brighton & Hove – A 20mph City?” (November 2012)
6. Item 52 – Transport Committee report – “Brighton and Hove 20mph limit - Formal SLO Consultation

