

<b>Subject:</b>	<b>Oxford Street Traffic Order</b>		
<b>Date of Meeting:</b>	<b>26<sup>th</sup> November 2013</b>		
<b>Report of:</b>	<b>Executive Director Environment Development &amp; Housing</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Jim Mayor</b>	<b>Tel: 294164</b>
	<b>Email:</b>	<b>Jim.Mayor@Brighton-Hove.Gov.Uk</b>	
<b>Ward(s) affected:</b>	<b>St Peters &amp; North Laine</b>		

**FOR GENERAL RELEASE**

Note: The special circumstances for non-compliance with Council Procedure Rule 3, Access to Information Procedure Rule 5 and Section 100B(4) of the Local Government Act 1972 (as amended), (items not considered unless the agenda is open to inspection at least five days in advance of the meeting) were Consultation on the Traffic Order that forms the basis of the report did not end until November 12<sup>th</sup>, by which time it was too late for a report considering feedback from that consultation to be included in the full agenda. However, it was considered preferable to bring the report as a late item to November Committee, rather than to leave the Traffic Order unresolved until the next available Committee date in January

**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 The purpose of this report is to address comments and objections made in response to the advertising of a proposed Traffic Regulation Order in Oxford Street, Brighton.
- 1.2 The Traffic Order proposed would introduce a bus lane with pedal cycles and taxis also permitted on Oxford Street between London Road and Oxford Court. The proposed bus lane would mean that vehicles travelling northbound on London Road would be prohibited from making a right turn into Oxford Street and likewise vehicles travelling southbound would be prohibited from making a left turn into Oxford Street. These prohibitions would not apply to buses, pedal cycles and taxis.

**2. RECOMMENDATIONS:**

- 2.1 That, having taken account of all duly made representations and objections, the Environment, Transport and Sustainability Committee approves as advertised the Brighton & Hove (Oxford Street) (Bus Lane & Prohibited Turns) Order 201\* subject to the following amendment:

Delete Schedule 2, item 2 (prohibition of left turn from London Road into Oxford Street).

**3. CONTEXT/ BACKGROUND INFORMATION**

- 3.1 The council recently received complaints from local residents relating to unclear vehicle signage in and around Oxford Street, and associated confusion around private vehicle access and bus lane enforcement. A fuller summary of these and associated concerns is provided by the London Road Area Local Action Team (LAT) response to the Traffic Order consultation set out in Appendix 1.
- 3.2 Brighton & Hove Bus and Coach Company also raised concerns that private vehicles ignoring restrictions and accessing London Road from Oxford Street was impacting on bus services, due to the short signal phase at the London Road / Oxford Street junction.
- 3.3 Officers investigating opportunities to clarify signage discovered that the signage relates to a trial arrangement that was implemented in Oxford Street some years ago, but never formalized by way of a traffic regulation order.
- 3.4 The proposed Traffic Order set out in Section 1.2 has been advertised to enable the council to obtain the views of interested parties and determine whether to formalize the existing “trial” traffic arrangement or introduce amendments to it. Thereafter any associated signage can be made clear, correct and legally enforceable. Consultation responses are set out in Appendix 2.
- 3.5 In total, excluding the representation from the London Road Area LAT, 23 responses to the Traffic Order consultation have been received. 8 generally objected to the proposals, 4 generally supported the proposals. 2 specifically supported formalisation of the westbound bus lane in Oxford Street, 1 specifically supported formalisation of the restriction on general traffic turning right into Oxford Street from London Road.
- 3.6 Notably, a high proportion of consultees objected to formalising the existing restriction on southbound vehicles in London Road turning left into Oxford Street. 12 consultees specifically objected to this element, in addition to the 8 who sent general objection. Although this movement is not made by a large number of vehicles, the route does provide a more suitable exit from the London Road area for vehicles that have serviced local shops etc, than alternatives such as the narrow Oxford Place.
- 3.7 In terms of wider (general) objections;
  - Comments 1 and 2 appear to be based on conjecture rather than evidence, and it is possible that the main point of contention is the proposed ban on southbound London Road traffic leaving London Rd via Oxford Street: a restriction that this report recommends is not formalised.
  - In relation to comments 3, 7 and 8, as set out in point 3.2 in the main body of this report, the Brighton & Hove Bus and Coach Company have expressed concerns about the impact of private vehicles delaying buses entering London Road from Oxford Street by ignoring existing “access restrictions” west of Oxford Place. The issue is related to the short signal phase at the junction for vehicles leaving Oxford Street. (HGVs or similar needing to access the bus lane slightly to then reverse into Oxford Court (a concern raised in comment 7) would not be penalised for doing so).

- In relation to comment 4, Baker Street will continue to offer a route into London Road from Ditchling Road, and so there is no reason to believe that the proposal will cause the problems suggested.
- In relation to comment 5, the consultation has not seen significant amounts of support for or against the formalisation of the restriction on northbound London Road traffic turning right into Oxford Street. Given that a project is starting to consider the wider London Road area, it is recommended that this issue be considered as part of that wider project, and for the time being the existing 'restriction' is formalised.
- Comment 6 appears to express concern about vehicles accessing Oxford Street from London Road to ultimately reach residential areas north of the Level. It is likely that this comment primarily relates to the proposed restriction on southbound London Road traffic turning into Oxford Street, as northbound traffic would use Lewes Road rather than London Road to exit the Valley Gardens area.

3.8 Based on that feedback, it is recommended that the Traffic Order is sealed as advertised with the exception of restrictions on southbound Traffic entering Oxford Street from London Road. This "existing restriction" will effectively be lifted when the new Traffic Order comes into force.

3.9 As indicated by the London Road Area LAT communication in Appendix 1, council officers are beginning work to investigate opportunities for wider improvements in London Road, in order to inform where indicative funding identified in the Local Transport Plan for future London Road improvements should best be focussed. This work, which will draw on community input, will provide a mechanism to consider wider concerns and suggestions made during the course of the TRO consultation process, as set out in Appendix 2.

#### **4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS**

4.1 The alternative is not to implement the Traffic Order and to remove the current signage. This is not recommended as the bus lane is necessary to ensure that the passage of buses, taxis and cycles is facilitated as far as possible.

4.2 The proposed restriction on southbound private vehicles turning left into Oxford Street from London Road would force the traffic that needs this access to use less suitable alternative routes, such as Oxford Place and this restriction will therefore not be implemented.

4.3 Rather than acting immediately on the wider suggestions received during the course of consultation, it is recommended that these inform the ongoing wider work to investigate longer term improvements for London Road to reduce risk of abortive / uncoordinated work.

#### **5. COMMUNITY ENGAGEMENT & CONSULTATION**

- 5.1 The Traffic Order has been advertised through standard channels, giving the local community and stakeholders opportunity to comment. Comments received are attached in Appendix 2.

## **6. CONCLUSION**

- 6.1 It is recommended that the Traffic Order is sealed as advertised with the exception of restrictions on southbound Traffic entering Oxford Street from London Road. This existing restriction will effectively be lifted when the new Traffic Order comes into force. The reasons for the recommendation are set out in the preceding text.

## **7. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 7.1 There is a £50k allocation within the Local Transport Plan (LTP) capital programme in 2013/14 for access improvements to London Road. There are also indicative allocations of £325k in 2014/15 and £300k in 2015/16. The cost of advertising and implementation of the Traffic Regulation Order will be funded from the 2013/14 Local Transport Plan allocation.

The cost of officer time associated with the scheme will be met from existing transport revenue budgets.

It is expected that there will not be any significant additional costs of enforcement associated to the implementation of the Traffic Regulation Order.

*Finance Officer Consulted: Steven Bedford*

*Date: 19/11/13*

### Legal Implications:

- 7.2 The Traffic Orders have been advertised according to the Road Traffic Regulation Act 1984 and the relevant procedure regulations. As there are unresolved objections and representations they are now referred to this meeting for resolution.
- 7.3 The Council is under a duty to exercise its powers under the Act to secure the safe and convenient movement of traffic and the provision of adequate on and off-street parking facilities. It must also take into account any implications that orders would have for access to premises, local amenity, air quality, public transport provision and any other relevant matters.

*Lawyer Consulted:*

*Carl Hearsom*

*Date: 15/11/13*

### Equalities Implications:

- 7.4 n/a

### Sustainability Implications:

- 7.5 Formalising the existing restriction on private vehicles using the westbound bus lane to access London Road from Oxford Street has a beneficial impact on bus efficiency, and so sustainable transport.

Any Other Significant Implications:

- 7.6 n/a

**SUPPORTING DOCUMENTATION**

**Appendices:**

1. London Road Area Local Action Team Representation
2. Wider Consultation Comments

**Documents in Members' Rooms**

1. n/a

**Background Documents**

1. n/a

## Appendix 1 - London Road Area Local Action Team Representation

Dear Sir or Madam,

**TRO-21-2013** Brighton & Hove (Oxford Street) (Bus Lane & Prohibited Turns) Order 201\*

- comments from London Road Area Local Action Team – Oxford Street

The following comments should not be taken as support nor objection to the proposed TRO, but are offered to advise the Council regarding the thoughts and concerns expressed in and to the LAT.

***The proposed TRO is a sensitive issue – and whether it goes ahead or not please can serious attention be given to the whole traffic flow in and around London Road.***

These comments are made on the understanding that the proposed TRO is not intended to be solution in itself, but needs to sit within a larger consideration of the whole traffic flow within and around London Road. We understand that such an investigation is being conducted at the moment.

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The LAT has received comments over a long period from one correspondent who has expressed concern and indignation that the “bus lane” prohibitions are regularly and repeatedly flouted. This matter has been brought to various LAT meetings for investigation and discussion. It has been asked “why is the bus lane not enforced?”. Other LAT members have commented on the difficulties of pedestrians crossing.

The issues around Oxford Street extend beyond the London Road junction – so much so that we held one meeting on the sole topic of Oxford street 20<sup>th</sup> August 2013 (ref: <http://londonroadlat.wordpress.com/places-and-special-items/oxford-street-mini-lat-meeting-august-2013/>)

At this meeting views were expressed that:

1. “the junction with London Road is diabolical” i.e. for motorists and certainly for pedestrians
2. the signage regarding the “bus lane” is completely unclear and unsatisfactory
3. crossing the road at the junction with Ditchling Road at the eastern end (near Level) is risky and highly unsatisfactory
4. the pavements are too narrow
5. access to and exit from the car park on Oxford Street is puzzling and incoherent
6. traversing the area (e.g. to get to London Road car park, should Oxford Street car park be full) is mind bogglingly difficult
7. travelling south along London Road a motorist is highly restricted in making left turns (e.g. to go to **east** along Lewes Road). If Oxford Street is closed to such traffic then the only route for sizeable vehicles is to go **west** up Cheapside and make a complete circuit via Preston Circus.

The last three points (5,6,7) were made with considerable emphasis by Bob Curtis (representative of London Road Traders, and the Federation of Small Businesses) and hopefully he and Ann Townsend the co-Chair of London Road Traders will have made their own definite representations on these points.

In view of these comments, as chair may I observe:

(1) from the **pedestrian point of view** the crossing at the end of Oxford Street (next to Boots) is at least unfriendly and frustrating and at worst dangerous. Pedestrians regularly walk into the road before the

green man shows – they cannot see which way traffic is coming and get frustrated at the delay. An improvement for shoppers on foot would be very welcome.

(2) From the **motorist's point of view** the journey south along London Road is confusing, and frustrating – the line of sight indicates a route south (past St Peters) and the possibility of a left turn in St Peters Place, but the traffic system only allows a right turn up Cheapside. As mentioned above this has the effect of sending (say) Lewes bound traffic round the whole system again.

Motorists repeatedly traverse the restricted area of road and the proposed TRO would in fact enforce the unsatisfactory route through Cheapside. Yet a proper solution to this unsatisfactory situation is badly needed. One wonders whether a holistic solution which embraces the York Place/St Peters place traffic flow, and links transparently with the Valley gardens scheme would be the best solution.

(3) From the point of view of buses (and taxis?) – so we understand from Brighton and Hove bus company – this junction is very busy and extremely important. One wonders whether, **if another route were found for private and commercial traffic to go east**, then the traffic lights and lane disposition at Oxford Street should be optimised for this use only?

#### **Summary:**

1. The current situation is unsatisfactory.
2. The proposed TRO has the virtue of clarifying and regularising the existing prohibitions. They would become enforceable.
3. The proposed TRO is inadequate in itself to produce a satisfactory result for pedestrians and motorists and would produce its own problems.

Whatever decision the committee comes to I would earnestly request that much more work is done to achieve a holistic solution to the larger problems.

*Philip Wells*

12/11/13

*Chair – London Road Area Local Action Team*

## Appendix 2 - Wider Consultation Comments

In addition to the representation from the London Road Local Action Team, 23 comments were received. As comments were not necessarily for or against each element of the proposal, and some comments included wider recommendations, those comments have, where appropriate, been divided over the following categories:

### General Support (4)

1	There is great confusion regarding traffic turning into Oxford Street travelling both north and south in London Road. The clearer restrictions are will result in motorists avoiding entry into London Road, particularly those travelling south, which will improve the environment, reduce risk to pedestrians, allow buses and taxis to run more freely, and discourage the use of cars.
2	We operate three bus services along the length of London Road. (While) I support this proposal
3	Bicycles and CTC support BHCC's proposals to allow only buses, taxis and cycles to use Oxford Street between Oxford Court and London Road.
4	I feel turns into and out of oxford st by so many vehicles extra causes congestion in an already crowded and polluted london rd. Having just buses using it is the most the busy Oxford st can, or should, accommodate. You will make pedestrians & cyclists feel safer especially as there is so mch illegal parking in Oxford st.

### Specific Support for Formalisation of Westbound Bus Lane (2)

1	On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to strongly support the need to address delays to buses in Oxford St. BHFOE therefore strongly supports a bus lane being introduced westbound for buses, taxis and cycles turning into London Road.
2	We strongly support a bus lane being introduced westbound for buses, taxis and cycles turning into London Road

### Specific Support for Formalisation of no Right Turn from London Road to Oxford Street (1)

1	BHFOE would also like to support, the banning of the right turn into Oxford Street from London Road, apart from buses, taxis and cycles. This movement is meant to be banned at present, but is often ignored by private vehicles causing congestion in London Road. This needs to be made clearer.
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### General Against (8)

1	I object as it will affect trade on London Road if cars cannot turn here. We need to make it easier for cars to get in to London Road not harder. Trade is struggling enough as it is.
2	increased pollution with detour for cars + my bus journeys unlikely to make substantial time savings to justify this.
3	I can see no good reason for this. "Ordinary" southbound traffic is already forbidden on London Road, and right turns from London Road are already forbidden. The order's main effect is to prevent use of Oxford Street for right turns by "ordinary" traffic from Oxford Street into London Road. This is not mentioned in the plans. There is no explanation of a problem needing to be addressed, and how the order will address it. It seems officious, unnecessary and surreptitious, even deceitful.
4	Closing this road to right-turning southbound traffic on Ditchling Road will put pressure on the junction further south with St Peter's Place. Lewes Road/St Peters Place/Cheapside/New England Street is one of the few east/west routes and is busy already.
5	I also object to the right turn ban from London Road into Oxford Street, even though this has been an existing restriction since the original implementation of the London Road traffic scheme. Since there are no other routes to exit the London Road area to the East to reach Ditchling Road (Northbound) such traffic typically turns right into the residential street Ditchling Rise, in the heart of Ian Davey's ward, and reaches Ditchling Road this way. It will be noted that the right turn ban has been consistently



	ignored over the years, and it's removal is not likely to increase traffic in Oxford Street to levels which would have adverse affects on bus manoeuvres.
6	Oxford Street is an important distributor road, providing access from London Road to the residential area north of the Level. There are no real alternatives without long detours and unsustainable use of fuel. This is particularly relevant for limited mobility and older shoppers and users of London Road shops.
7	1. The first stated reason for implementing this TRO is flawed. The amount of traffic using this stretch of road is at the most minimal and the traffic light sequence certainly allows more than one vehicle to exit or enter the road, so gains for facilitation would appear to be zero. 2.The second reason is also flawed as no amenity improvement is gained in the London Road/Oxford Street area by passengers and/or cyclists being able to leave the city centre more expeditiously. The provision of a few metres of bus lane is certainly not going to improve bus times to the extent to give any appeal to anyone. 3. The imposition of the prohibition of a left turn from London Road, on the other hand, will have an adverse economic impact on the sustainability of businesses in the area through increased delivery times (charges) and the loss of customers. Below Baker Street there are at present four exits for traffic travelling south on the London Road, three to the east and one to the west. Oxford Street is the only one to provide a clear, clean exit from the road and the only one to give a clean and unhindered exit into Ditchling Road. Oxford Place is narrow and periodically blocked by taxis collecting passengers from outside the Co-op. It is also less than suitable for HGVs and larger lorries on a regular basis. Queen's Place is situated immediately by the Cheapside junction traffic lights and therefore vehicles turning into Queen's Place will directly affect the clean flow of buses and taxis to the south, thus negating any "advantages" gained in the Oxford Street scheme. In the case of a large vehicle trying to exit by this route, a holdup to both lanes of traffic may well ensue. Both Oxford Place and Queen's Place exit directly onto two and three lanes of traffic heading south on Ditchling Road. The exit from Queen's Place having to cross one right turn filter lane to just to get back into the main flow. Both the above appear to be far less economically viable than the existing arrangement. 4. The plan as submitted with this TRO indicates that the end of the bus lane would be in line with the Oxford Court junction. Oxford Court leads to the delivery entrances for Boots and the Coop supermarket and previously for Buxtons. It is likely that these premises will receive regular deliveries by HGVs which would need either to reverse into or out of Oxford Court. Whichever manoeuvre they perform they would be crossing into the bus lane as proposed and thus being liable for a penalty on a regular basis. As this area is covered by the traffic camera on Ditchling Road, in the worst case scenario this could mean a penalty for every HGV delivery to these large stores, was this the intention of the order?
8	I object to this introduction of a bus lane here because there is no need for it and it would be a waste of money. As it is already not permitted for people to turn right onto this road and traffic coming down London Road is already very limited because the Beaconsfield Road traffic cannot go straight ahead this left turning onto Oxford Street will only limited use and there is hardly ever a queue here because of this. Furthermore this will cause confusion and some difficulties for a few people who may have taken a wrong turn.

### Specific Against Banning Left Turn into Oxford Street (12)

1	I object to the proposals to stop general traffic turning left into Oxford Street. This will entail delivery vans/residential traffic/shoppers to need to queue to turn right by Aldi to join the traffic in New England Street to then complete a circle and return via Preston Circus to reach places to the east of London Road. Already at peak times and even on weekends there are frequently long queues trying to get out of New England Road to turn right to Preston Circus. Sometimes only 3 cars can exit when the traffic lights change to green, due to the long queues from Seven Dials/Old Shoreham Road. I use this route frequently when shopping at Sainsbury's and it often takes 15 minutes to make the journey from Sainsbury's to Preston Circus (I have even had to drive to Brighton Station to get out of this queue and return via the Old Steine!), this will only get worse with the new proposals not with standing the inconvenience/extra pollution and wast of fuel for residents of East Brighton, Furthermore, this will also involve the buses queuing behind traffic turning right by Aldi, so journeys will take longer not shorter as the policy suggests.I therefore
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	strongly oppose these proposals which have clearly been prepared by someone who never needs to access this area.
2	I'm a local resident who lives in the area between London Road and Ditchling Road. In order for me to travel to the east of the city I currently travel south on London Road and make a left turn onto Oxford Street. The alternative is to navigate a lengthy one-way system via Preston Circus using what is already a congested route and contributing extra time to my journey and releasing extra pollution to the city because I have to take a longer route. As a regular driver on Oxford Street I cannot see what problem you are trying to resolve with this change – from my observations the London Road / Oxford Street junction does not cause congestion but these actions will force me onto already very congested roads. I believe car usage on this road does not impact on bus journey times and would be very interested to see the studies you have made in order to support this statement – would I be able to view those under a Freedom of Information request? Your proposal states you want to “improve the amenities of the area”, whereas I feel a lot of the current improvements to this area have actually had a negative impact on me – the current building work at the old Co-Op; the imminent arrival of several hundred student neighbours in what is already a very highly populated area; the redevelopment work on The Level leading to the displacement of street drinkers to the roads around my property.
3	yet again residents in the centre are being walked all over. first you allowed the building of unwanted student accommadation on the old Co-op site, now you allow the contractors to block off the main arterial route down Baker Street sending speeding traffic down unsuitable roads, now you are not allowing us to turn left into Oxford Street but sending us on a diversion just so you can please the Bus Company. Just waiting for you now to ban left turns into London Road and we will start to become our own kingdom as in Passport from Pimlico.
4	Southbound, there has been absolutely nothing wrong with traffic turning left into Oxford St. Indeed, it is an easy way to get to the car park there. The sign has been ignored (intentionally or not) since it was first put up. PLEASE LEAVE THINGS AS THEY ARE (i.e. take the sign down). London Road has enough problems as it is and the Greens know it and do little to help the situation.
5	This proposal will cause a significant increase in journey times for people returning to Woodingdean. I have never known left turning traffic into Oxford Street cause an obstruction to buses etc. turning right from London Road. A bus lane of this length is a ridiculous waste of money, especially since they would then join up almost immediately with cars leaving Oxford Court car park. This could have a serious impact on the cost effectiveness of deliveries to businesses on London Road and result in loss of trade or even job losses.
6	This left turn is necessary to allow delivery vehicles and vehicles from east Brighton to leave London Road by the quickest route available. The enforcement of this order would result in unnecessarily increased journey times and obstruction of the Cheapside junction. At present there is no obvious impediment of buses by vehicles turning left into Oxford Street. No economic impact assessment has been made concerning the effect on trade of those businesses requiring deliveries between Baker Street and Oxford Street.
7	Prohibiting left turns from London Road into Oxford Street will mean that people who had been parked in Baker Street and wish to travel north up the Ditchling Road will have to go via Cheapside to New England Hill and Preston Circus, thus increasing traffic density in an already busy area and causing increased pollution.
8	We do not support the left turn ban from London Road southbound into Oxford Street because cars which are legitimately in London Road (having arrived there from side streets) would have a detrimental effect on bus services if they continued straight on and would be better leaving the area quickly via Oxford Street eastbound.
9	Brighton Area Buswatch objects to the proposal to ban the left turn for southbound traffic from London Road into Oxford Street. From our observations this movement is not heavily used and does not pose a problem. We feel this ban would be of little benefit to buses or other vehicles and it would unnecessarily antagonise local traders. It could lead to more cars travelling further south, increasing congestion around the busy bus stop outside the Co-operative supermarket.
10	BHFOE is objecting to the left turn ban into Oxford Street from London Road (and

	consequently making Oxford St an eastbound bus lane) as it is concerned that this might cause more vehicles to head south past the Co-op supermarket into an area that is already quite congested with buses and taxis. Making more traffic head south past Oxford St is less desirable and could result in further delays to public transport. In contrast, traffic turning left into Oxford St, as such, does not cause buses or taxis a problem. If cars stopping in this part of Oxford St are a problem, this could be addressed by better signage more clearly signalling that there is no loading here.
11	<p>I would like to object to the recent proposal regarding Oxford St. Brighton.</p> <p>Traffic driving south from Preston Circus must be able to turn left into Oxford St to enable them to journey east. The alternative route would force vehicles to turn right at Aldi supermarket and continue all the way around New England St to Preston Circus.</p> <p>Retailers in London Road have had to put-up with so many problems over the years and this would just about finish it as motorists would avoid coming this way altogether. It would create an island, just like Newhaven where traffic bypasses the shops and it is a well-known fact that it has killed trade.</p>
12	I object to the proposals for the bus lane in Oxford Street and prohibited turns from London Road into Oxford Street. The measures will not be able to deliver any measurable benefit to bus users. The proposals contradict the explicit intention in the original design of the London Road traffic scheme that local traffic in London Road should be able to exit to the East by turning left into Oxford Street. To implement a left turn ban would impose a lengthy, slow and unnecessary detour for vehicles which are predominantly servicing premises in London Road, and often are too large to exit via Oxford Place & Queens Place. Forcing such traffic to proceed to Cheapside, will actually cause delays to buses which will be increasingly blocked when more traffic queues to turn right.

### Wider Suggestions (6)

1	<p>To ensure that (the westbound bus lane) is clearly signed, we would suggest that a small build-out is installed in Oxford St on the west side of the junction with Oxford Court and that the bus lane sign is placed on this build-out.</p> <p>The current signage is part of the problem in that it is far from clear. Its location at the back of the pavement means that it is not in driver's line of vision and in an area with quite a lot going on it is easily missed. Just moving the sign across the pavement would improve this visibility, but as the pavement is quite narrow here, this is not desirable. Instead, placing a sign on a small build-out would be much more visible to motorists without impeding pedestrians on the pavement. It would also part act as a physical barrier to motorists, reinforcing the start of the bus lane.</p> <p>BHFOE also believes that more focus needs to be given to reducing delays to buses and taxis in the London Road area and for there to be an investment in significantly upgrading the bus shelters in London Road, which south of Oxford St are not fit for purpose. In fact, southbound, there are no shelters at all, and bus users have to stand under the Co-op canopy or stand in the rain. Northbound, the shelters are totally inadequate for the vast numbers of people catching the bus. Just extending these shelters is not an option as it would still fail to resolve this capacity issue.</p>
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	<p>Instead, a more extensive continuous shelter across part of the pavement is required. Although, this is not directly related to the TRO, it does need addressing urgently.</p> <p>In terms of reducing delays, BHFOE would like to see the (traffic light) right turn phase into Oxford St significantly reduced or removed totally. It often holds up southbound traffic, particularly buses, when there are no buses or taxis turning right into Oxford St. This is unnecessarily adding to delays to buses and adding to running costs. Given that much of the traffic heading is south is public transport, removing the right turn phase would probably have little effect as buses heading south are very likely to allow buses to turn right into Oxford St. At the very least this traffic light sequencing needs greater scrutiny as the current situation is adding to operator costs and increasing delays.</p>
2	<p>The signage is unclear in Oxford Street and private cars use it to access London Road. We believe that some cars may enter it unwittingly and are then faced with no choice but to exit into London Road because they do not want to go to the car park. Signage specifically indicating "No access to London Road" would help with this.</p> <p>We agree with BHFOE that a small build-out should be installed in Oxford St on the west side of the junction with Oxford Court to accommodate the bus lane signage.</p>
3	<p>While I support this proposal I wish to raise the issue of traffic light phasing at the junction of London Road and Oxford Street, particularly for traffic heading south. It is noticeable that this phasing has been altered to allow much more time for northbound traffic turning right into Oxford Street to the detriment of traffic heading south who now get a very short time period of "green". I would ask that this is taken into account should this TRO proceed.</p>
4	<p>If the council is unwilling to reconsider their position on the bus lane measures, they should reverse the direction of traffic flow on Francis Street when it is re-opened, to provide a route allowing local traffic to exit to the East.</p>
5	<p>There are related issues in this area which we feel are should be a higher priority for the Council:</p> <ol style="list-style-type: none"> <li>1. Restricting vehicles travelling westbound in Oxford Street. Westbound traffic is already banned west of Oxford Court, except for buses, taxis and cycles but this is widely ignored, partly because signing is not clear. We support the proposal for a build out to discourage traffic from turning left from Oxford Court into Oxford Street as suggested by Brighton &amp; Hove Friends of the Earth.</li> <li>2. The phasing of the traffic lights at the London Road/Oxford Street junction should be reviewed. At present southbound buses in London Road are often delayed longer than necessary due to the northbound right turn filter, designed to assist buses turning right into Oxford Street. Having observed the traffic flows and received concerns from theSussexBus.com which operates three bus services along London Road, we question whether this filter signal phase is necessary and suggest it is reviewed.</li> </ol>
6	<p>5. My opinion is that the present arrangement should be left in place for the foreseeable future. The whole road layout in the area needs to be considered as one and not in a piecemeal fashion.</p>