

Subject:	Brighton & Hove 20mph Speed Limit – Phase 2 : Objections to Speed Limit Orders for Surrenden Road, Preston Drove and Stanford Avenue		
Date of Meeting:	29th April 2014		
Report of:	Executive Director of Environment, Development & Housing		
Contact Officer:	Name:	Emma Sheridan	Tel: 29-3862
	Email:	emmasheridan@brighton-hove.gov.uk	
Ward(s) affected:	Preston Park, Withdean and Patcham		

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

- 1.1 The purpose of this report is to address comments and objections relating to the draft Speed Limit Orders (SLOs). The orders outline the proposed introduction of a 20mph speed limit in Surrenden Road, Preston Drove and Stanford Avenue.

2. RECOMMENDATIONS:

- 2.1 That, having taken account of all duly made representations and objections, the Environment Transport & Sustainability Committee approves as advertised the following orders:
- Brighton & Hove (Phase 2, Area 4) (20mph Speed Limit) Order 20** Amendment No. * (TRO-9b-2014) Preston Drove, Surrenden Road (between Preston Drove and Braybon Avenue) and Stanford Avenue
 - Brighton & Hove (Phase 2, Area 5) (20mph Speed Limit) Order 20** Amendment No. * (TRO-9c-2014) Surrenden Road (between Braybon Avenue and Ditchling Road)

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 In May 2010, following an investigation into 20mph speed limits and zones by the Environment and Community Safety Overview and Scrutiny Committee (ECSOSC), the panel produced a report containing 15 recommendations (see Background Document 1). In broad terms, the main recommendation was the wider implementation of 20mph speed limits in residential areas and on the roads outside schools, routes to schools, roads outside parks and playgrounds, sports and leisure facilities, community buildings, older people's care homes, local shops and on roads in busy shopping areas.
- 3.2 In October 2011, the Department for Transport (DfT) set out a new policy

framework for the country's traffic sign systems. Included in this were provisions making it easier for councils to introduce 20mph schemes. This takes the form of a reduction in the need for physical traffic calming measures in 20mph zones by expanding the list of permitted traffic calming measures to include repeater signs and reducing the need for road humps and chicanes.

- 3.3 An outline proposal for the phased introduction of 20mph speed restrictions across the City was considered at the Environment Transport & Sustainability Cabinet Member Meeting in May 2012 where the principles of the proposed implementation programme (see Background Document 4) were agreed. Permission was granted to undertake city wide stakeholder and public consultation, preparatory research, surveys and street character assessments.
- 3.4 On 15th January 2013 the Brighton & Hove City Council Transport Committee granted approval for the first phase of implementation of 20mph speed limit programme in central Brighton and Hove (see Background Document 6). The limit came into force on 8th April 2013.
- 3.5 On 11th December 2013 the Brighton & Hove City Council Environment, Transport & Sustainability Committee granted approval for the advertisement of Speed Limit Orders for the Phase 2 area.
- 3.6 On 4th March 2014 the Brighton & Hove City Council Environment, Transport & Sustainability Committee granted approval for the implementation of 20mph limits in the Phase 2 area and, in response to public representations, for the advertisement of draft Speed Limit Orders to reduce the speed limit to 20mph on Surrenden Road, Preston Drove and Stanford Avenue.

4. COMMUNITY ENGAGEMENT & CONSULTATION

Petitions

- 4.1 A petition signed by 742 people was presented to full Council in January 2014 and to the Environment Transport and Sustainability Committee in March 2014 asking Brighton and Hove City Council "To reconsider the decision not to reduce the speed limit on Preston Drove, Stanford Avenue and Surrenden Road to 20mph
- 4.2 Following the presentation of the above petition and a deputation made at the March Committee, Committee members approved the advertisement of draft Speed Limit Orders for Surrenden Road, Preston Drove and Stanford Avenue.

Advertisement of Draft Speed Limit Orders

- 4.3 The draft Speed Limit Orders (SLOs) for Surrenden Road, Preston Drove and Stanford Avenue were advertised on 18th March 2014 with the closing date for comments and objections being 8th April 2014.
- 4.4 The Ward Councillors for the area were informed, as were the Bus and Taxi Companies operating within the City and the statutory consultees such as the Emergency Services. The notices were published in The Argus newspaper and were available to view at the City Direct Offices at Bartholomew House and Hove Town Hall. The documents were available to view and respond to directly via the

Council website. In addition, notification and copies of the orders were distributed by email to all those who had provided contact details for further information when responding to the public consultation on the Phase 2 area. On street notices were displayed on the relevant roads.

Individual responses to the Speed Limit Orders

- 4.5 In total, correspondence was received from 135 individuals or organisations in response to the SLOs (hard copies of the responses are available to view in the Members Room and a summary is provided as Appendix 1)
- 4.6 The correspondence has been reviewed in order to understand the various reasons behind the support for, or objections to, the proposals. A number of submissions related to more than one issue.
- 4.7 The majority of reasons provided for those supporting and opposing the proposals were the same as those raised during the public consultation on Phase 2 and previously with the advertisement of SLOs for the Phase 1 and Phase 2 areas. These issues were addressed at length in the Committee Reports presented to and debated by the Transport Committee in January 2013 (Background Document 6) and by the Environment, Transport & Sustainability Committee in December 2013 (Background Document 7) and in March 2014 (Background Document 8).
- 4.8 This report addresses in detail those issues which are new, those that are specific to the Speed Limit Orders for Surrenden Road, Preston Drove and Stanford Avenue and those where new information has become available.

Geographical Spread of responses

- 4.9 155 submissions from 135 individuals or organisations. Of these 132 were in support of the SLOs and 3 were in objection to them. This can be broken down as:
- 3 objections were received (1 from Compass Travel, 1 from a resident of Surrenden Road - the north/south section, and 1 from a resident of Woodingdean)
 - 6 submissions were received from residents of the east/west section of Surrenden Road - all of these were in support of the orders
 - 14 submissions were from residents of Preston Drove – all of these were in support of the orders
 - 6 submissions were from residents of Stanford Avenue – all of these were in support of the orders
 - 7 submissions were received from residents of the north/south section of Surrenden Road - 1 objected and 6 were in support of the orders
 - 6 submissions were from individuals resident outside the City,

- 25 submissions were from residents or business owners in other parts of the city (7 of which were from within the Phase 1 area, all of which were in support)
- All other submissions were from the roads around or adjoining the roads covered by the orders and all were in support (noteworthy are 10 submissions in support from Havelock Road, 9 in support from Loder Road)
- No responses/objections were received from Brighton and Hove Bus Company or the taxi trade

Support for the Proposals

4.10 132 individuals responded giving complete support to the proposals. In addition to stating general support for 20mph limits in principle, these submissions cited the following reasons for their support:

- Roads are major routes to and from local schools and parks
- Improved safety (particularly for children)
- Will encourage more walking and cycling
- Will create a more pleasant environment
- Will improve traffic flow
- Will reduce pollution and noise
- The limit was appropriate as streets are residential/family areas
- A feeling that current speeds were too fast

Objections to the Proposals

4.11 3 responses were received in complete objection to the proposals. 1 from Compass Travel who operate the supported bus service 56 along Stanford Avenue, 1 from a resident of Surrenden Road - the north/south section, and 1 from a resident of Woodingdean)

Impact on Bus Journey Times

4.12 1 objection, from Compass Travel, was made on the grounds that the scheme would have a negative impact on bus journey times, particularly route 56 which travels up Stanford Avenue.

4.13 This issue has been addressed in detail in Background Document 6: Paragraphs 4.15-4.21. Officers have undertaken journey time surveys specifically of Stanford Avenue which showed that the maximum impact of a reduced limit on this road would be 23 seconds. This is based on travel at a constant speed of 30mph compared to a constant speed of 20mph with the vehicle not stopping at any of the three bus stops along this 800meter stretch of road. Officers consider that such a scenario is unlikely to take place on a normal journey and as such the impact on bus journey times for the 56 route would be insignificant.

4.14 It should also be noted that Brighton and Hove Bus and Coach Company who also operate bus services on one the roads (Surrenden Road) covered by these orders have supported the Phase 2 proposals.

Casualties

4.15 Two objections stated a belief that 20mph would not reduce casualties.

4.16 Details of casualty and collision data within in the Phase 1 area was presented at

the March 2014 ETS Committee (Background Document 8: paragraph 4.50). Further collision and casualty data has been collated for the first 10 months of the 20mph becoming operational in the Phase 1 area. As can be seen from Figure 1 below, within the Phase 1 area there have been no fatal collisions since the implementation of the 20mph limit and overall there has been a decrease in the number of collisions and in the number of casualties based on 8 months of 2013 data compared with the 3 year average for the same months in the previous three years.

4.17 As was the case when earlier figures were presented to the Committee in March 2014, it should be noted that the figures here can only be considered indicative at this stage and in order to have truly statistically robust data it is preferable to have 3 full years of monitoring data as this will ensure that findings are not skewed by seasonal variations or unique/one off events. However, these interim results continue to be in line with the positive results seen by other cities and are an encouraging indication of success even at this early stage.

4.18 Figure 1: Casualty Figures 8th April to 7th February

All Collisions by Severity			
	3 yr average 2010 - 2012		2013-14
Fatal	1		0
Serious	43.3		39
Slight	225.7		189
TOTAL	270		228
All Casualties			
Fatal	1		0
Serious	44		39
Slight	272		235
TOTAL	317		274

Waste of Money

4.19 1 objection stated the opinion that the programme represented a waste money and that funds would be better spent elsewhere (e.g. of adult care services).

4.20 The funding for the 20mph programme is capital funding allocated via the Department for Transport and cannot be used for revenue expenses such as social services as was proposed.

4.21 Officers continue to consider that the proposals are cost effective and are significantly less expensive than the implementation of more geographically limited 20mph zones. The Department for Transport provides financial estimates of the average value of the prevention of reported road casualties and collisions. The average value of collision saving to society of just one collision is over £71k and it is at £50k on average per casualty (rising to almost £1.7 million for a fatal casualty), bearing this in mind it is considered that the casualty saving potential of 20mph limits more than justifies the relatively small expense of the programme.

Signage and Road Markings

- 4.22 1 objection stated that the respondent objected to the increase in metal signage
- 4.23 The Council is bound by the Traffic Signs Regulations and General Directions 2002, which sets out where and what type of signage is required on the highway. Signage of any speed limit is clearly important so that drivers and other road users have the information they need to travel safely and within the law.
- 4.24 As part of the implementation of Phase 2, just as was undertaken in Phase 1, a de-cluttering exercise will accompany the implementation so that any redundant signage is removed at the same time. A number of redundant signs have already been identified for removal on the roads covered by this report.
- 4.25 Wherever possible, and within the statutory requirements, signage for the scheme will be sympathetic to the area but it must be implemented correctly to ensure that the speed limit can be self enforcing. The approach that officers have adopted to signage has been developed with, and is supported by, Sussex Police.

5. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 5.1 It is an option to retain existing limits on Surrenden Road, Preston Drove and Stanford Avenue. To do so however would be contrary to the expressed wishes of local residents. For this reason it is recommended that the Committee accept the recommendations made in this report.

6. CONCLUSION

- 6.1 The vast majority (98%) of those who responded to the advertisement of the Speed Limit Orders supported the introduction of 20mph limits on these streets.
- 6.2 Strong public opinion exists amongst residents of the Preston area for speed limits on Surrenden Road, Preston Drove and Stanford Avenue to be reduced to 20mph as evidenced by recent petitions and representations by local ward councillors.
- 6.3 The benefits of 20mph speed limits continue to be recognised nationally and internationally and ongoing interim monitoring of the Phase 1 area of Central Brighton & Hove continues to indicate that these benefits are starting to be realised in the city after 10 months. There remains, however, a continued need for the investigation, monitoring and evaluation of speed limits across the city.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 Capital: The sum of £0.320million has been allocated for Phases 2 and 3 of the introduction of 20mph speed reductions in the city, as part of the Local Transport Plan Capital Budget for 2014-15.

- 7.2 Ongoing maintenance of the scheme will be funded from within existing Transport budgets.

Finance Officer Consulted: Jeff Coates

Date: 16/04/14

Legal Implications:

- 7.2 Section 84 of the Road Traffic Regulation Act 1984 allows traffic authorities to set speed limits. Procedural requirements are contained in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 which require public notice of proposed orders to be given. Any person may, within 21 days of the notice, object to an order and any duly made unresolved objections must be considered by this Committee before any order can be made.
- 7.3 There are no human rights implications to draw to Members' attention.

Lawyer Consulted: Hilary Woodward

Date: 17/4/2014

Equalities Implications:

- 7.4 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:

- 7.5 The proposed scheme should assist the Council in encouraging more sustainable transport use such as walking and cycling by reducing vehicle speeds and improving safety and the perception that the streets are safer and more user friendly. Any modal shift to more sustainable transport achieved as a result of the wider implementation of 20mph speed limits will also assist in improving air quality and reducing carbon emissions contributing to the Council's "One Planet Living" programme

SUPPORTING DOCUMENTATION

Appendices:

1. Summary of submissions made

Documents in Members' Rooms

1. Copies of the submissions received in response to the Orders

Background Documents

1. Environment and Community Safety Overview and Scrutiny Committee

- (ECSOSC) report on 20mph (2010)
2. Speed Limit Review – A & B Class Roads (September 2010)
 3. Speed Limit review – 20mph Pilot Schemes (June 2011)
 4. Environment and Transport Sustainability Cabinet Member Meeting – “Brighton & Hove – A 20mph City” report (May 2012)
 5. Item 32 – Transport Committee Report - “Brighton & Hove – A 20mph City?” (November 2012)
 6. Item 52 – Transport Committee Report - “Brighton & Hove – A 20mph City?” (January 2013)
 7. Item 49 – Environment Transport and Sustainability Committee Report (December 2013)
 8. Item 89 – Environment Transport and Sustainability Committee Report - Brighton and Hove 20mph Limit Phase 2 – Submissions made in response to Speed Limit Orders (March 2014)

Crime & Disorder Implications:

- 1.1 There are no Crime and Disorder Implications of the report at this time.

Risk and Opportunity Management Implications:

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

Public Health Implications:

- 1.3 Road casualty reduction is a Public Health priority and an indicator for Domain 1 of the Public Health Outcomes Framework 2013-2016. It is anticipated that the reduction in speed limits to 20mph in residential and commercial areas will help to reduce collisions and the severity of the outcome of some collisions. It is estimated that over 95% of pedestrians involved in a collision at 20mph survive, compared with only 80% at 30mph. A review of the impact of introducing 20mph zones in London over a twenty year period (Grundy et al 2009) demonstrated a reduction in road casualties particularly amongst young children.
- 1.4 It is likely that the scheme will support people to choose more physically active lifestyles by opting to make healthier active travel choices such as walking and cycling. Physically active adults have less risk of premature death and of chronic diseases with the direct cost of physical inactivity to the NHS across the UK is estimated to be £1.06 billion. For Brighton & Hove this cost is estimated to be **£3,077,340**
- 1.5 Promoting active travel can bring important health benefits but also contributes to objectives in relation to sustainability & congestion & air pollution, especially to reduction in particulate matter. This is discussed above in paragraph 4.40.
- 1.6 NICE guidance PH 8, PH 25 and PH 31 all recommend speed restrictions and the prioritisation of pedestrian and cyclists as means to improve public health

Corporate / Citywide Implications:

- 1.7 The proposed scheme will assist the Council to meet its strategic objectives and will contribute to the Council's and partners' wider objectives including those set out in the Corporate Plan and the Sustainable Community Strategy.
- 1.8 Brighton and Hove Bus Company have in the past raised concerns about the impact of the 20mph speed limits in the off peak hours on a number of cross city bus routes. Research carried out whilst preparing the proposals, together with the growing evidence base of actual impacts of such schemes in other areas and in the Phase 1 area, indicate that such concerns are unlikely to be realised as a result of the Phase 2 proposals. A significant number of roads have been

excluded from the scheme, many of them requested by the bus company. In addition bus priority works being undertaken in a number of roads in the city and in the phase 2 area will provide time savings for buses that officers consider will more than compensate for any minor journey delays that could be caused by lower speed limits. Monitoring will however continue to be undertaken on this issue.