

Subject:	Brighton and Hove 20mph Limit Phase 3 – Submissions made in response to Speed Limit Orders		
Date of Meeting:	17th March 2015		
Report of:	Executive Director Environment, Development & Housing		
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Ward(s) affected:	Hangleton & Knoll and Hove Park		

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 (items not considered unless the agenda is open to inspection at least five days in advance of the meeting) were that time was needed to finalise the report following the deadline for objections at Friday 6th March.

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 (SLO). The orders outline the proposed introduction of a 20mph speed limit in the phase 3 area of Brighton and Hove. The report covers specifically the area covered by the Speed Limit Order advertised for Brighton & Hove (Phase 3, Area 4) (20mph Speed Limit) Order 20** (TRO-4c-2015) as this was the only order to which an objection was received.

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 order:

- Brighton & Hove (Phase 3, Area 4) (20mph Speed Limit) Order 20** (TRO-4c-2015)

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 peoples 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 4th March 2014 the Brighton & Hove City Council Environment, Transport & Sustainability Committee granted approval for the second phase of implementation of 20mph speed limit programme in residential areas of Brighton and Hove (see Background Document 8). The limit came into force on 16th June 2014.
- 3.6 On 20th January 2015 the Brighton & Hove City Council Environment, Transport & Sustainability Committee granted to advert Speed Limit Orders for Phase 3 of the 20mph programme (see Background Document 10)

4 COMMUNITY ENGAGEMENT & CONSULTATION

Petitions

4.1 Hove Park

The Committee received a petition, signed by 116 people, presented at Council on 13 October 2005 by Councillor Bennett. *'I / We support traffic calming and a speed limit of 20mph in The Droveaway, Hove.'*

4.2 Hangleton

On 30th July 2009, Councillor Barnett presented a petition, signed by 114 people, to the Environment Cabinet Meeting calling for a 20mph speed limit in parts of Hangleton & Knoll. The petition stated that "We, the undersigned, would like to give our support to Cllr Dawn Barnett, Cllr Tony Janio and Cllr David Smart who are campaigning to reduce the road speed to 20 miles an hour in the Hangleton and Knoll area where there are schools and playgroups."

- 4.3 On 25th November 2014, The Committee received a petition signed by 280 people which stated that "We the undersigned petition Brighton & Hove Council to Reduce the speed limit on Holmes Avenue in Hove to 20 mph at the next

Phase 3 consultation, as there is a school on the same street and many people driving dangerously”

Advertisement of Draft Speed Limit Orders

- 4.4 The draft Speed Limit Orders (SLOs) for the Phase 2 20mph programme area were advertised on 13th February 2015 with the closing date for comments and objections being 6th March 2015.
- 4.5 The Ward Councillors for the areas were consulted, 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 Brighton & Hove Independent 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. On street notices were posted in all areas covered by the advertised Orders.

Responses to the advertised Speed Limit Orders

- 4.6 In total, correspondence was received from 10 individuals in response to the 6 SLOs (hard copies of the responses are available to view in the Members Room and a summary is provided as Appendix 1)
- 4.7 The correspondence has been reviewed in order to understand the various reasons behind the support for, or objections to, the proposals.
- 4.8 This report addresses in detail those issues raised in the single objection received which relates specifically to (TRO-4c-2015) which covers the Hangleton and Knoll Area and a small section of Hove Park Road west of Nevill Road.

Support for the Proposals

- 4.9 9 responses were received in support of the Phase 3 20mph proposal. Of these, 5 related specifically to the area covered by this report (TRO-4c-2015). In addition to stating general support for 20mph limits in principle, these submissions cited the following reasons for their support:
- Roads were routes to school
 - 20mph would reduce accidents and injuries on the road and improve the safety of the neighbourhood.

Objection to the Proposals

- 4.10 1 response was received in objection to the proposals for the Hangleton Area, specifically for 20mph in Nevill Avenue the eastern end of which is located in Hove Park Ward with the western end located in Hangleton and Knoll ward.
- 4.11 The reason given for the objection was “More traffic queuing which will cause more pollution and a waste of council tax payer money to implement. In Nevill Avenue if traffic is queued because of a problem it is noisy and would detract from quality of air and ability to enjoy the garden. “

Air Quality, Noise, and Congestion

- 4.12 It remains the case that evidence is limited on this topic and this issue has been explored in background doc 7 paragraphs: 4.37 – 4.39 and background document 6 paragraph 4.26 – 4.28. In summary, the most recent available research on this topic, undertaken by Imperial College London, found that “it would be incorrect to assume that 20mph speed restrictions would be detrimental to air quality...[and]... air quality is unlikely to be made worse as a result of 20mph speed limits.”
- 4.13 In addition it remains the case that a key aim of the proposals is to create streets that are more attractive for walking and cycling. The potential increase in active travel modes could lead to a reduction in car journeys, particularly those which are short and local in nature, which are the most polluting.
- 4.14 With regards to congestion, research has shown that where speed limits are reduced (for example from 30mph to 20mph) that traffic flows can be improved as cars more easily turn into and out of traffic at junctions and flow at a more constant speed without the need for excessive (noisy) acceleration and braking at junctions, traffic signals and crossing points.

Waste of Money

- 4.15 The objector stated the implementation of 20mph represented a waste of council tax payer money.
- 4.16 The funding for the 20mph programme is capital funding allocated via the Department for Transport Local Transport Plan and therefore is not funded from council tax payments. Officers continue to consider that the proposals are cost effective.

5 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 5.1 It is an option to retain existing limits on Nevill Avenue. To do so, however, would not only be contrary to the expressed wishes of local residents and of local ward Councillors, it would also add significant costs to the implementation of the scheme caused by increased signage costs. For this reason it is recommended that the Committee accept the initial officer recommendations for these roads, made again in this report, and approve implementation of the 20mh programme in this area.

6 CONCLUSION

- 6.1 All but one of those who responded to the Phase 3 Speed Limit Orders supported the introduction of 20mph limits, 5 of the 9 supportive submission related to the Hangleton Area.
- 6.2 Strong public opinion exists amongst residents of the area on and surrounding Nevill Avenue including 57.5% of those on Nevill Avenue itself who responded positively to the public consultation on this matter.

- 6.3 For the above reasons it is recommended that despite the single objection received that officers be granted permission to implement 20mph speed limits as outlined in the advertised Speed Limit Order Brighton & Hove (Phase 3, Area 4) (20mph Speed Limit) Order 20** (TRO-4c-2015)

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 It is anticipated that the capital costs associated to the recommendations in the report will be funded from the Local Transport Plan (LTP) capital programme. The total LTP budget allocation for the 20mph programme in the 2014-15 financial year is £0.537m as approved at Policy and Resources Committee. Some costs will be incurred in the 2015-16 financial year, and it is anticipated that it will continue to be funded from the council's LTP capital programme. The draft 2015/16 LTP capital programme will be considered by the council's Policy & Resources Committee on 19 March 2015.

Finance Officer Consulted: Steven Bedford

Date: 10/03/15

Legal Implications:

- 7.2 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.
- 7.3 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.
- 7.4 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.
- 7.5 Where there are unresolved objections to the Speed Limit Orders, then the matter is required to return to Environment, Transporting Sustainability Committee for a decision.

Lawyer Consulted Katie Matthews

Date: 11 March 2015

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.

SUPPORTING DOCUMENTATION

Appendices:

1. Additional implications
2. 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)
9. Item 61 – Environment, Transport and Sustainability Committee Report - “20mph

Programme” (November 2014)

10. Item 75 – Environment, Transport and Sustainability Committee Report – “20mph Programme” (January 2015)

Appendix 1

Crime & Disorder Implications:

- 1.1 There are no Crime and Disorder Implications of the report at this time. The revised proposals outlined in this report have been discussed in detail with Sussex Police Roads Policing Unit who have raised no objections to the recommendations.

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 and 2 areas and in the Phase 3 area, should it progress, to ensure that any issues are identified, addressed 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 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 Background Document 7: 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 a 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, the Road Safety Strategy and the Sustainable Community Strategy

Appendix 2 – Summary of Submissions received to Phase 20mph SLOs

	Order	Object Support /	Contents
Resident - Holmes Avenue	4c - Hangleton	Support	Routes to school, will decrease chance of accident and of children getting injured
Resident - Elm Drive	4c - Hangleton	Support	will slow traffic , routes to school, high numbers of pedestrians crossing the road, will improve safety
Resident - The Cliff	4e - Rottingdean & Ovingdean	Support	Small road on which 20mph "makes sense"
Resident - Holmes Avenue	4c - Hangleton	Support	Routes to school, will decrease chance of accident and of children getting injured
Resident - Holmes Avenue	4c - Hangleton	Support	Routes to school, will decrease chance of accident and of children getting injured
Bricycles/CTC/BH Cycling Campaign	All	Support	20mph a theme of the Space for Cycling Campaign. Evidence supports slower speeds reducing road casualties and collisions
Resident - Mile Oak Road	All	Support	Will slow down traffic
Resident - Nevill Avenue	4c - Hangleton	Object	will cause congestions and poor air quality and traffic noise and is a waste of money
Resident - outside area	4d - Hove Park	Support	Routes to school, will decrease chance of accident and of children getting injured
Resident - The Cliff	4e - Rottingdean & Ovingdean	Support	Support 20mph limit in Cliff Approach, Cliff Road & The Cliff

