



Bricycles
Brighton, Hove and District Cycling Group
www.bricycles.org.uk

Please reply to:

2 Glovers Yard
121 – 123
Havelock Road
Brighton
BN1 6GN

19 February 2006

Stuart Croucher,
Transport and Planning Team Leader
Brighton and Hove City Council,
Hove Town Hall,
Norton Road, Hove
BN3 3BQ

Dear Stuart,

Re: Draft provisional Local Transport Plan, 2006/2007 to 2010/2011

In general, Bricycles supports the Council's over-arching objectives for the Sustainable Transport Strategy, but believes that the LTP should contain greater traffic reduction and traffic speed reduction measures to encourage sustainable modes as described below. We would also like to see more emphasis on reducing the need to travel.

Bricycles contributed to the bid for Cycling Demonstration Town status and we are very pleased that Brighton and Hove has been selected. We are happy to assist the council in encouraging cycling and reducing car use. The council has already done some good work in promoting cycling and by the introduction of the parking strategy under the Decriminalised Parking Enforcement (DPE).



A23 cycling facilities

Although Bricycles is primarily a cycling campaign group, we strongly support other sustainable transport modes. However, we are concerned that the council will continue to prioritise buses above cyclists and pedestrians, as demonstrated in the A23 cycling facilities which contain hazardous features and which also removes space from pedestrians.

It is becoming more common for cyclists to cite the large number of buses in Brighton as an increasing problem in the City Centre, notably in North Street and Western Road. We are also concerned about pedestrian casualties particularly at York Place. **The correct 'hierarchy of road users' should be employed, with pedestrians and cyclists at the top.**

We note the plans for Valley Gardens and want to be fully consulted. We agree that the area needs rethinking and rationalising. The implications for cyclists are not mentioned at all in your description of the scheme on pages 110 - 112, and we find this very worrying. How can cyclists be overlooked?

We are concerned that recently we were not consulted about the closure of North Street Quadrant and I made this clear at the last Cycle Representatives' Meeting on 23 February 2006.

Despite DPE, car parking in Brighton and Hove continues to be chaotic. We observe increasing disregard for cycle lanes and pavements. Risks to cyclists of all kerbside parking includes the risk of being 'doored' as car doors are opened into the path of cyclists, and also of being pushed further out in to the traffic flow. We see no effective actions taken to date or planned by the council to reduce parking in cycle lanes or on cycle tracks/pavements and at junctions.

There is no indication in the LTP of any early response from the Council to the declared Air Quality Management Area. The description of the air quality problem i.e. high levels of nitrogen dioxide could be more clearly spelled out on page 25. It is clear that the action plan required by DEFRA (Department for the Environment, Food and Rural Affairs) will not be produced in time to be included in the LTP despite the statement on page 26. Urgent action should be taken to display air quality information at problem areas such as Preston Circus, so that vehicle emissions and the air quality problem are clearly linked in the public mind. The LTP says on page 47: "It is only with reductions in car use of 10 - 20% will significant differences in air quality be effected." Bricycles supports congestion charging for vehicles entering the city centre and is disappointed to see that this has not been included in the Plan despite the air quality problem.

The council continues to speak of extending the 'cycle network' but its development is too slow and inadequate. If the council is serious in wanting to encourage cycling and reduce vehicle emissions, all roads should be made safe for cycling - this would provide the greatest mobility for cyclists and a safer environment for other road users.



Camden's expensive cycling facilities put cyclists at risk, reduced their mobility and were made unnecessary by the introduction of congestion charging.

Whilst dedicated cycling facilities can offer a solution in certain circumstances, we have not been sufficiently reassured that the 'high quality cycle freeways' will not limit mobility for cyclists. Cyclists need to be able to turn left and right and should be prioritised at junctions. We have already drawn it to your attention that a representative of Camden Council informed us that the expensive new 'cycling facilities' in Camden were made redundant by the success in traffic reduction achieved by congestion charging. In addition we observed hazards associated with these facilities where vehicles crossed cyclists' path. They limited mobility when compared with the use of the road network.

Unsegregated facilities (i.e. shared with pedestrians) are also of very limited usefulness if cyclists are unable to stay on their bikes due to crowds of tourists and pavement cafés. Utility cyclists should be prioritised e.g. cycle commuters going to work/school/college and those using the bike for shopping etc. These are people for whom the bike is the main means of transport and who are not using motor vehicles. This is not equivalent to leisure use.

The hierarchy of provisions with traffic reduction and speed reduction as a first step should be employed.

The Brighton and Hove Cycling Strategy which was agreed with Brighton and Hove City Council in 2004 is not being used as a guiding document, and has not been promoted by the Council to the public, despite a great deal of input by Bricycles and others in its development. This seems to be a waste of our input. It was agreed that progress in implementing the strategy would be monitored.

There are a number of cycling casualties in Brighton and Hove where it has proved very difficult to obtain the facts from statutory bodies (rather than newspaper stories) about what actually happened. As this is crucial to improve safety, we would like to see better information made available in a timely manner.

Greater care needs to be taken about the consequences for cyclists when roadworks take place in Brighton and Hove. For example the cycle lanes and other areas on the Lewes Road have been frequently dug up over the last year or more with no arrangements made to ensure cyclists safety.

The council should publish cycle parking guidelines for all organisations, particularly statutory organisations e.g. for Brighton and Hove City Council premises and NHS bases as the standard of cycle parking is very unpredictable. Cycle Parking should be covered, highly visible and near to main doors and entrances, and 'front wheel grips' should not be used. Cycle stands should not be placed perilously close to roads (e.g. outside London Road Sainsbury's) where one step backwards will put the cyclist under a bus.

We are grateful for the council's support over keeping bikes on trains, particularly from Cllr. Craig Turton and Cllr. Vince Meegan.

The draft LTP promotes Park and Ride, and the linked 'Rapid Transport System' (buses from a car park north of Brighton to main destinations) as central to future transport needs. However the huge car park proposal at Patcham Court Farm was rejected and we have not seen what revisions have been made.

In any case, Park and Ride is not a 'green solution' - it is an expensive out of town traffic generator which will blight nearby areas with massive car parks and access roads. Public transport solutions should address whole journeys, not just the last couple of miles. There are no plans to reduce city centre parking spaces so it is impossible to see how the promised traffic reduction supposedly linked to Park and Ride will take place. Road user and/or congestion charging would be more effective.

The scales on the maps on pages 62 -73 are flawed, for example if the travel time is 10 mins, it could be located in the 5-10 or the 10-20 category. This needs checking with Steer Davies Gleave. The map on page 76 is correctly labeled.

Cycle signage should be introduced sooner than 2009. The use of bus lanes is particularly unclear. Signs should be clearly visible and legible,

We are glad to see a clearer link with health, though we are disappointed that the cycling subgroup of the Active Living Task Force 'called 'City Cycling' and chaired by myself for the first 18 months, was not mentioned by name.

The points below are taken from my previous letter to you concerning the LTP and are a summary of our recommendations for encouraging cycling

- **Enforce a 20 mph speed limit** in the whole city centre and populated areas, with low speed limits on exit roads.
- **Introduce congestion charging** in Brighton and Hove city centre.
- **Make roads 2-way again!** For example, St. James' St., Viaduct Rd., New Rd., North Rd., Trafalgar St., and many others, i.e. all our routes which have been sacrificed to manage the throughput of motor vehicles.
- **Build out pavements** to reduce large areas of tarmac and to prevent cars speeding around bends (like at Preston Circus).
- **Require travel plans** from all schools, colleges, universities and particularly the large 'Top 20' employers which show how they intend to reduce motor vehicle use. (Is it possible to allow businesses some kind of financial or other incentive in order to encourage them to develop a travel plan?)

- **Provide cycle training** for all age groups.
- **Re-instate pavements** for pedestrians by taking space from motor vehicles.
- **Improve air quality** - Information should be made easily accessible to the public about the poor air quality in Brighton and Hove e.g. by a regular item in the local newspaper or a public display at Preston Circus. Obvious steps to reduce motor vehicle emissions should be taken now rather than waiting for the completion of detailed measurements and bureaucratic processes. Residents should be made aware of the health implications of traffic emissions and poor air quality.
- **Create the role for a Parking Attendant for Cycling patrol** - Give instructions that one of the Parking Attendants is given special responsibility for keeping cycle lanes and other bike facilities clear of obstructions such as parked vehicles. The attendant would also be aware of what action to take if the obstruction is a skip, broken glass or some other kind. He/she would be provided with a bike to patrol facilities such as Coombe Terrace, Pelham Terrace, New Road, Preston Road, Preston Street and so on. The attendant would be particularly valuable during commuter times, i.e. 8 – 9 am and 4 – 6 pm. The attendant could report back on problems identified which cause problems for cyclists and he/she could assist with action plans to overcome them.



Parking at Coombe Terrace cycle lane, Lewes Road

Yours sincerely,

Becky Reynolds,
 Bricycles Campaigns Officer
 CTC Right to Ride Representative <http://www.communigate.co.uk/sussex/ctcbrighton>