

Appendix 1 – Public Comments: Totally Radio

Key:
Comments received from Totally Radio
Response from Brighton & Hove City Council

Re: Brighton Valley Gardens Phase 3 – (Royal Pavilion to Seafront)

Comments received from Totally Radio

Phil Jones of Wired Sussex and a LEP Board member suggested I should get in touch with Tony to talk about serious concerns with the change in direction shown in the latest 'favoured' plan for the final stage of the Brighton Valley Gardens scheme. This is in stark contrast with generally well received publicly available earlier stage versions that had been seen before the last Brighton Environment Transport and Sustainability Committee meeting in October.

A more detailed submission is attached together with basic plans for 'favoured' Option 1 and also three alternatives that for some reason were not presented in that last meeting. There is also no public record of how that decision was taken. At least two of the rejected plans conform to one of the original core objectives of improving the flow of public transport. The first 'favoured' option clearly doesn't and our group of significant local businesses and other organisations is worried about the implications for both the visitor economy and wider environmental and public health impact.

We share a pressing concern that after years of sitting on things, there is suddenly an unexplained rush to push ahead with this hugely important scheme - without adequate time to meaningfully engage with anyone at all who lives or works in the City. Fundamental changes apparently emerged at the ETS Committee meeting last month and we became aware only three weeks ago. The strange thing is that with just a handful of meaningful changes, almost all of us would back the scheme. A modest pause would allow trust to be rebuilt with full and transparent stakeholder engagement.

We have asked the ETS Committee to consider a short pause on the scheme and to work collaboratively in producing an improved Business Case to present to the Local Enterprise Partnership in January - taking into account the full picture and its impact on the heart of our great city, its residents, visitors, businesses small and large, health and education services.

The core substantive issues I had hoped to discuss with Tony are as follows:

- **Clarification about the LEP timetable.** We understand that funding does not need to be drawn down this financial year. Is that the case? Consequently, It would make no sense for there to be a hard deadline for the Business Case - more appropriate to get that right at the outset. If the current administration has wilfully procrastinated and risked LEP funding, it does not in any way justify the current compressed consultation and evaluation period.

- **Local Enterprise Partnership funding for the scheme was predicated upon four core objectives** including as outlined in the 'Full Independent Business Final Report - Valley Gardens' commissioned by Coast 2 Capital and delivered by Parsons Brinkerhoff on the 17th February 2015, "Buses, taxis and local access will be moved onto a

consistent route that will run along the western side of Valley Gardens, and private vehicles will be kept on the eastern side of Valley Gardens." The social and environmental benefits of such an approach are clear for all to see - yet this aspect of the scheme was mysteriously lost in the sole 'favoured' option presented to and accepted by the ETS Committee on October 9th. **Was the LEP consulted before the favoured scheme was drawn up?**

Phases 1&2 BC referred to.

It is beyond doubt that the Old Steine and the wider Valley Gardens area can be substantially improved. Joined up priorities must include a programme to maintain already existing public space including tackling homelessness and treatment for drug and alcohol dependency. Valley Gardens 3 has the potential to do great things and the Local Enterprise Partnership will surely want to see a process that involves effective communication and considered consultation with all stakeholders – before the detailed planning begins.

Don't hesitate to ask if you require anything further. I hope Tony is on the mend soon and look forward to hearing back from him or one of your colleagues.

BHCC reply

A Consultation and Engagement Plan and Stakeholder Management Plan were produced in May /June 2018.

The plans set out a two-stage approach to public consultation that has now been conducted:

- Stage 1 (May-June 2018): Initial qualitative consultation to understand user issues and thoughts on the scheme area. Used to inform development of a longlist of options. 870 responses
- Stage 2 (October-November 2018): 6-week formal public consultation on single preferred option. (833 responses)

The following engagement strategies have been employed:

- Online questionnaires on BHCC consultation portal
- (Stage 2) 2 week exhibition at Hove Town Hall staffed for 3 days. A 3 week exhibition at Jubilee Library staffed for three days.
- Hard copies of survey to be made available at events or on request
- Consultation period advertised via social media and council press release
- Posters displayed in public areas including car parks and public transport

In addition to public consultation, there has also been engagement with internal and external stakeholders to obtain local insight and to inform the ongoing design process. Internal consultation has included lead Members and ward councillors, and technical, strategic, and operational officers from a range of the council's service areas. Externally, the Connected City's Transport Partnership has been, and will continue to be, engaged as will user groups and business representatives.

The project Manager presented to the Brighton Safety Advisory Group in August to introduce the Phase 3 project and establish contacts across the blue light services (Police, F&RS, and ambulance services).

There has been no change in direction as implied in this letter.

The programme (and eight core design objectives) was agreed at June 2018 ETS Committee. Following the development of a robust options appraisal framework a long list of option could be objectively measured. The four best scoring options (with a range of junction scenarios for the seafront) would then be developed further before again being objectively measures and tested further using a traffic model.

It was agreed according to the approved programme that the top scoring option would be presented to October ETS committee with approval sought to advance the single option to a public consultation.

The results of the public consultation together with insight collected from future direct engagement with the key stakeholders would enable a revision of that single option to be revised in readiness for January/Feb 2019 committee.

The council is now completing engagement with directly affected stakeholders which will help inform the preferred option revision specification. Engagement in this period has also included internal property interests given that the council has freehold/leasehold interests in the directly affected area. This demonstrates that external property interests have not been left behind but considered at the same time as the council property interests to enable a holistic revision of the preferred option.

In June 2018 committee it was also agreed that a draft LGF Business case would be presented/reported to November ETS Committee. Approval was successfully granted to submit this BC to the LEP in readiness for LEP Board (Dec 2018 or January 2019). The committee also gave delegated officer authority to update the BC before submission given that the scheme design is not yet complete.

It is understood that the lifecycle of a project continues beyond the outline options appraisal stage as reported to committee in October which was used to develop the BC. The schemes development detail may change until detailed design is completed (c. Dec 2019) however assurance is given that project will not diverge from the 'five cases' as presented in the BC to be submitted. The project will continue to align to the five cases in strategic, economic, financial commercial, and management terms as reported in the BC - and the council will continue to demonstrate a deliverable and successful project.

An Equalities Workshop attended by Possability People, 4 Oct, to test the preferred option was very successful with the outline preferred option strongly supported and welcomed subject to detail design improvements.

Following October ETS Committee there has been two rounds of design workshops with Connected Transport Partnership Members to further develop the design all of which will be considered for inclusion in the preferred option revision specification.

Example of external stakeholder engagement in last week used to inform revision of the preferred option

VG phase 3 Design Workshops - Stage 2b

Meeting	Date
TP Walking Cycling, Motorbikes	11 Dec
TP Walking Cycling, Motorbikes	13 Dec
Taxi Trade	13 Dec
OBP Quality Bus Partnership	11 Dec
Sealife	3 Dec
Healy's Solicitors	13 Dec
Sainsbury's	12 Dec
Regency Surgery	12 Dec
Pavilion Surgery	12 Dec
Marlborough Public House and Theatre	12 Dec
YHA	12 Dec
Language School	13 Dec
Brighton Bus Co	13 Dec
Royal Albion	14 Dec

Events stakeholders	3 Dec
Events stakeholder	14 Dec
Palace Pier	14 Dec
Brighton Experience at Brighton Youth Club	13 Dec

All of the above meetings and those held following October ETS Committee have been constructive. Further stakeholder engagement will continue if the project is given approval to progress to detailed design Feb 2019 ETS Committee.

The design process has also been reinforced by two D: SE design panels. A four person expert panel unanimously supported the single preferred option following the options appraisal process. Other letters of support received include those from Brighton Society and FotE.

Overall the Phase 3 project will deliver a strategic sustainable integrated transport corridor with a new safer junction that enables all to have direct access to the seafront. New public spaces will create new improved settings for the city's key heritage assets and provide supplementary cultural events spaces and tourism and business amenity spaces to ensure the cities continued success.

Comments received by Totally Radio

Thank you for your letter responding to my initial email about the proposed next phase for Brighton's Valley Gardens Phase 3. Since writing, representatives of a diverse cross section of Brighton's major employers, businesses small and large, public sector organisations and residents attended the Council committee meeting where the business case for VG3 was approved. We are puzzled and dismayed that desk based research and design for an initiative so central to our city's future was seen as sufficient - without qualitative research or meaningful engagement with key stakeholders. Benefits outlined to the tourist economy were disputed in a deputation - attached, presented by the same Brighton Palace Pier named in the draft business case. This week, a delegation had a constructive meeting with Nick Hibberd and other BHCC senior officers, after presenting them with a list of more detailed questions and concerns - a copy attached. We look forward to hearing answers at our next meeting in early January. I'm also pleased to say that Officers have since begun to contact stakeholders including a workshop scheduled with the combined taxi trade, and visits to the city centre surgeries and Brighton Palace Pier coming up.

BHCC response

The first stage of consultation (May/June 2019) was qualitative-based research. Public opinion with regards to the existing site conditions and also views on their experience of using the area were elicited. Ideas for improving the area in terms of transport and public space were also elicited. This together with new transport surveys collected on the site in June together with existing survey data has been used to inform the development of a long list of options (44). A robust options appraisal process followed in the next stage of the project between June and October.

As agreed by committee a single preferred option would be presented to committee at October ETS Committee following the robust and objectively measured options appraisal. Approval was given to consult the public on this single option. Also as planned, local businesses would be consulted following October committee, to gain insight and to help inform a revision of the preferred option together with the insight provided by the wider public consultation. The revised preferred option is due to be reported to ETS Committee in February once further design work is progressed.

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The BHCC ETS Committee meeting that approved the business case can be viewed in full [here](#).

https://brighton-hove.public-i.tv/core/portal/webcast_interactive/378798

On any measure, it is hard to see how the current business case could be accepted by the LEP without revision of admitted omissions and mistakes. Naturally if these were corrected, it could be argued that the revised version was not the same document approved - and that perhaps it ought to be reassessed by the next ETSC on the 22nd of January before formal submission. This window will surely allow BHCC to determine local needs and consult the necessary parties in order to submit a properly developed business case to you.

BHCC response

For transparency, as agreed by the BC was presented at Nov ETS Committee, where officers were granted delegated authority to update the business case to prepare for final preparation before submission to the LEP in December.

There were questions raised by Committee members in November that were answered, in the main, by the appointed BC consultant - to give the committee confidence that the BC could be submitted to the LEP.

The LGF BC was completed under the LGF Transport Project category and the economic case was completed accordingly.

Comments received by Totally Radio

Over the course of meetings with councillors, officers and lobbyists in the last month, we have understood more about competing strategic objectives for this stage of Valley Gardens phase 3. The consultants and planners overarching ambition for Brighton's urban centre is to 'encourage' local drivers on short journeys not to drive - at least not in single occupant private vehicles. "Changing behaviours" to make driving in the city so miserable that hopefully less people do it. Dealing with the messy detail of real people and empirical evidence is a distraction if you a 'just want to get things done'. Aside from the democratic deficit - whether there a mandate for this course of action, there's the specific risk that as well as less 'bad' hyper local drivers, there'll be less 'good' visiting drivers from outlying suburbs and beyond too.

Nobody would argue that current congestion and pollution levels in the city aren't a huge problem and that radical solutions need to be discussed openly. Councillors and officers have dismissed a need for comprehensive traffic modelling relevant to Brighton's resort and shopping destination 'use case', on the basis that weekday two hour peak is all Govt requires. This cavalier attitude is indicative of an unwillingness - or an inability through limited time or resources, to deal with the essential detail in a project of this type.

What is currently proposed represents a massive gamble being taken with the city's future. If the dots are not joined up, considering all of the connected pieces in Brighton's unique but fragile ecosystem, it could destroy people's livelihoods, their lived environment and be catastrophic for the wider city economy.

I am of course happy for you to raise the concerns directly and for BHCC to review and provide you with answers to each point.

Please don't hesitate to come back to me if you require anything further.

BHCC response

Overall the Phase 3 project will deliver a strategic sustainable integrated transport corridor with a new safer junction that enables all to have direct access to the seafront. New public spaces will create new improved settings for the city's key heritage assets and provide supplementary cultural events spaces and business amenity spaces to ensure the cities continued success.

Engine technology improvements mark an expected shift from diesel to electric/hydrogen fuel cells for mass rapid transport that will mitigate noise and air quality risk.

Detailed design will optimise traffic calming to further support noise and air quality across the area.