

Near Final copy

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Re: LTP5

Hi,

Starting with some praise: Much of the current LTP4 has basically offered a cycle and pedestrian only transport policy, with few positives for bus users, apart from some accessible kerbs. This has all changed with Trevor Muten becoming the lead Transport councillor, with his keen interest in bus services.

Since when, we are likely to obtain several red routes, two short bus lanes, and an updated real-time information system (although we cannot blame Trevor for its poor implementation). However, the key concern is- the LTP5 shows little sign of these positive ideas continuing beyond this brief golden age, with its current short-term programme. Especially if we have a change of Administration responsible for the transport portfolio. Beyond this brief positive window, the council's ongoing programme, only relates to items such as supporting bus routes, fare subsidies etc. None of the infrastructure that pays for itself over and over again, is mentioned.

So, for Buswatch, the LTP5 is a hugely disappointing document. Whereas other councils let key stakeholders see the later drafts – so as to iron out important issues, before general publication; this was not the case in Brighton & Hove. It has stated that some consultation took place in 2021. Given the policies listed, there are question marks over how much input those connected with bus services had into the drafting of the document.

The main bus company has repeatedly stated that bus priority offers the single greatest help to bus services. This is barely mentioned, and does not appear at all in the forward programme (post 2025/6) at all! **Let us first start by examining what a success Brighton's bus services have been:-**

Over recent decades, most cities outside London have suffered a substantial drop in bus usage, whereas Brighton has seen at least a 50% increase, to what was the highest ever bus usage. Part of this success has been the unified network, built on positive ideas from the local bus companies. However none of this would have been possible without the positive infrastructure, such as the bus lanes, to make buses acceptably reliable (plus other measures such as the best bus real-time information system available, accessible bus stops etc.).

This increased bus usage has underpinned the regeneration of the city, from the run down eighties, to the vibrant buoyant city we see today.

This public transport solution has prevented more severe congestion problems, had a more car based approach to regeneration been pursued. Worsening traffic congestion within the city would have likely stifled this growth.

Buses are positive in so many other ways, offering a high quality **all inclusive** travel mode, including for those with disabilities. The high frequency on many bus routes makes it an attractive alternative to using a car, or even needing to *own* a car. Because Brighton has a lower car ownership rate than most cities, the bus often makes better sense- combined with the good rail connections.

And by offering such an attractive alternative to using the car, it reduces the city's Carbon emissions. All this has been achieved for many years, without any significant council subsidy, including a good night bus network- boosting the evening and night-time economy.

So how does the LTP5 respond to this golden transport mode, which is so essential to the social and economic fabric of the city? In a couple of words- very poorly.

While the report does mention that the city has the highest bus usage (pro-rata) outside London, this appears to be in isolation, not suggesting how this has been achieved, and could be maintained.

We only need to look at the success of the express bus routes (1X, 12X, 13X etc.) to see how these could be further developed, if we had even more radical bus priority measures.

There is no mention as to how increased use of bus services has transformed the city. The only other mention of bus usage, is to mention that bus usage has reduced slightly since the pandemic. What it does not mention is that bus usage has reduced less here, than in most other areas!

Also the main report fails to mention that the council's household survey showed that **for shopping, or personal business- almost half (45%!) of respondents travelled into the central area by bus!**, which is at least twice of that who travelled in by car. This important fact reinforces the vital importance buses play in the city's economy, and further emphasises the deficit in current policies towards buses, covered in the LTP5. *This information was hidden deep within the supporting Evidence base (P35).*

Looking at LTP5: **Starting in the Executive summary:**

Challenge 1: *should have been* encouraging bus usage: This has so many advantages- economically and socially. Conversely if bus services are undermined by poorly designed policies and proposals; then this also undermines so many other bus positives- such as inclusivity, affordability, lowering toxic and Carbon emissions etc.

So where is encouraging bus usage in the list of challenges- it is not listed!

On supporting the transition to Low and zero Carbon vehicles (Challenge 3), the report concentrates on replacing diesel and petrol vehicles, with pure electric vehicles.

These scenarios rely heavily on the public being willing to change their propulsion mode, for which there are increasing signs of resistance. Also there is the need for buses to have sufficient range, so that they can comfortably operate all day, without needing a recharge (otherwise there is substantial extra cost from duplicate buses- while the buses are being recharged; and extra staffing costs).

There is no mention of how the current high bus usage significantly lowers the city's Carbon emissions, and how this should be encouraged. Especially as the Carbon reduction from increased bus usage is underreported, as covered later in this document. This will provide a guaranteed reduction in Carbon emissions.

While some valid points are made in 'creating a more inclusive network' (Challenge 4) particularly for disabilities, the disproportionate coverage of low income families (with some questionable graphics, and the overuse of national data) may not reflect local realities. The over reliance on this criteria, is likely to generate policies that undermine the overall needs of bus passengers.

Objectives:

It is good to see Increase public transport usage is 'Objective 1'. However that is where the good news ends.

If you look at both short term and long term priorities- you will not see bus priority (especially bus lanes) listed at all.

The list relies heavily on rail schemes, for which the council has little mandate, and big schemes, for which the council has a particularly poor record.

Even looking at BSIP priorities for 2025 to 2030, bus priority does not appear on the four listed priorities. **It is only within one of the eight 'actions' on page 32, that bus lanes (and other priorities) are mentioned.**

This is hardly a ringing endorsement within the council priorities.

There is no other bus priority measure listed beyond this coming year, whereas the A259 Active travel scheme is listed perhaps to 2028.

The council does have a programme of suggestions for cycle and pedestrian enhancements (LCWIP). In addition, by the speed at which the new cycle lanes were introduced during the pandemic, this may indicate that council officers had already spent money on creating these designs, as these were ready to roll out, with weeks.

If only the same was true for bus priority. We have been reliant on Council Muten and the bus companies pushing for the bus lanes, red routes etc. that have been created over the past couple of years.

There was a document, misleadingly called the 'Bus network review', containing a number of bus lane proposals. While it could be argued that this document could have been far better, at least some priority was on the cards. The impression has been gained that this document has been dropped, leaving no bus lane priority measures in the

pipeline. This action document is certainly not listed within the Council plan's 2023-27 decision documents, on page 16, whereas LCWIP is.

While signal priority is being considered for the Eastern Road corridor, this is tiny compared to the overall need (and may not be indicative of the best results achievable).

At modest cost, East Sussex County council (covering a far larger area); is in the process of adding bus priority to every traffic signal in the county, where buses run.

This should be a huge embarrassment to a city that is so reliant on its bus services.

Projects chart: The funding chart could be regarded as misleading.

The figure given is for BSIP funding. By leading with bus lanes etc. (rather than revenue funding- which represents most expenditure), this may leave a casual observer thinking the council for 2025/6, is spending ten times as much on bus schemes, than most other items listed. This is highly misleading, as the vast majority of this money is being spent on revenue items such as supporting bus services, subsidising fares etc.

While the group are yet to obtain actual figures, the total money spent on bus lanes (etc.), is probably less than £1.5 million. Especially as only 10% of the Western Road scheme is positive for buses, with the rest of the scheme being slightly negative for bus services.

Also, it was understood that perhaps 29%? of say £9 million BSIP expenditure should be allocated to capital items. If so, this £1.5 million figure works out at less than half of this allocated figure.

More importantly, this money only covers one or two years. There are no planned bus priority measures for future years, whereas the A259 Active Transport scheme may cost perhaps £6 million. This would be perhaps four times as much spent on bus priority. And is likely to be just one of many schemes.

Thirdly, it should be remembered this is almost the first significant sum spent towards helping buses in many years, whereas the council boasts about its many recent cycle (etc.) enhancement projects.

While these environmental improvements can be positive, the needs of bus users also need to be respected.

Valley Gardens 3 could prove to be the most negative scheme for buses, in many years. With the LTP document inaccurately implying bus users will gain from the scheme.

Also many potential bus priority schemes, can also help cyclists/pedestrians and enhance the environment (especially a possible London Road and Lewes Road shopping area improvement scheme).

No wonder the council wanted to include BSIP funding, within its LTP funding envelope, because it is probable that none of these positive bus measures would have taken place without this BSIP funding, which should be another embarrassment. With the DtT national funding being cut by 5% a year, future BSIP funding could be at risk, certainly in the medium term.

Reducing bus punctuality problems: It has been noted that the main document also omits information about deteriorating bus punctuality.

This non frequent bus service punctuality figure has fallen from 89% in 2011/2 to 75% in 2023/4; in the face of traffic congestion, minimal new bus priority, and road-works.

While it is good that the council is trying to reduce these problems. However, instead of trying to eliminate the congestion problems at source, with bus lanes and other priority measures; the chosen solution has been to add extra buses on a route. While the bus companies have been forced to adopt this costly solution, the council does have a choice.

Whereas providing a bus lane is a one off cost, the provision of extra buses is an *annual expense*. If you were to assume an extra bus costs £250,000 per year to run; over 20 years that would amount to £5 million, and that is just one bus, on one route. This figure needs to be multiplied many times for the whole network.

The council has recently used BSIP funding to finance an extra bus on each of the 24, 26 and 46 routes (totalling say £15 million over 20 years). If the council had not stepped in, this would have to be financed through higher bus fares, which passengers do not appreciate, or allowing unacceptably unreliable services to persist.

However, while a bus is more likely to turn up, adding these extra buses has resulted in more generous timetables, with buses sometimes unnecessarily waiting at bus stops to keep to the timetable. This can make the bus journey excessively slow, annoying passengers, and makes it more likely intending passengers will return to using a car. And, we thought the council wanted to encourage bus usage.

The forward capital programme beyond 2025/6 certainly does not mention Bus lanes or any other bus priorities.

Something that is mentioned (and has the potential to become a serious bus issue), is *improving city centre walkability*.

If this only refers to pedestrianizing St. James Street, this would not be so bad. However, when the council previously attempted to remove buses from the vital Churchill Square/ Western Road area, they tried push buses on to the congested seafront. If that is what is intended by *improving city centre walkability*, that would be disastrous for the city and its bus services.

Quantifying Carbon emission reduction.

There is a risk that over reliance on the Carbon Assessment Playbook could also undermine the provision of bus services.

Firstly, it is fairly likely that the data used for this playbook is based on national averages. The city's bus network is far from average. For a start we have almost the highest bus usage, and run a number of hybrid vehicles, which further reduces the Carbon footprint of our local buses. Our bus lanes are generally in the right position, which is not always true in other areas. This tool has the potential to be quite crude, and unrepresentative. Especially as the background CCC National balanced pathway, does not give *improved model choice*, as a separate heading towards reducing Carbon emissions.

Secondly, the city will also soon be getting a number of electric buses, presumably using Carbon neutral electricity- so further reducing the Carbon footprint of buses.

And as the years roll by, this number of electric is likely to multiply (so further reducing overall footprint, of buses). With this plan we are looking towards 2035, so also need to look forward, with buses playing an increasingly important part.

Thirdly, nationally, the government previously suggested that three people in a small car, produce less Carbon emissions, than the same people travelling by bus. This is ridiculous.

As the bus is already running, so the Carbon emissions have already been accounted for, by existing passengers. So the extra Carbon cost of having three additional passengers using the bus is tiny.

On the other hand, the entire Carbon footprint of running an extra car would need to be added to the city's total. So the suggestion that car passengers can ever produce less Carbon per passenger mile than when travelling by bus, is ridiculous.

Similarly cycling and walking may have gained over prominence in policy. When the national average Carbon footprint is utilised for comparison with buses the marginal Carbon footprint should be used instead, as it better reflects reality.

If a cyclist chooses to instead use a bus (perhaps because it is raining), then the extra Carbon produced would be minimal, because the bus is already running, and the Carbon footprint has already been assigned to the passengers already on the bus.

The opposite is also true. If we lose a bus passenger, the Carbon footprint of the bus would remain almost the same; but use of some alternative travel modes may well add to the city's Carbon footprint.

Given the unbalanced nature of this LTP5 document; which does not recognise the essential nature of bus services to the city; it is difficult for Brighton Buswatch to give this Local Transport Plan our full support.

Yours Sincerely

Peter Elvidge on behalf of Brighton Buswatch.

Executive members of the group held a special meeting to agree this document.

THIS MAY NOT REPRESENT THE FINAL VERSION OF THIS DOCUMENT

The final document, with possible minor changes; was also signed by the chair and vice chair.